



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

THIS IS THE BEGINNING OF MUR # 2767/2757

DATE FILMED 11-8-93 CAMERA NO. 2

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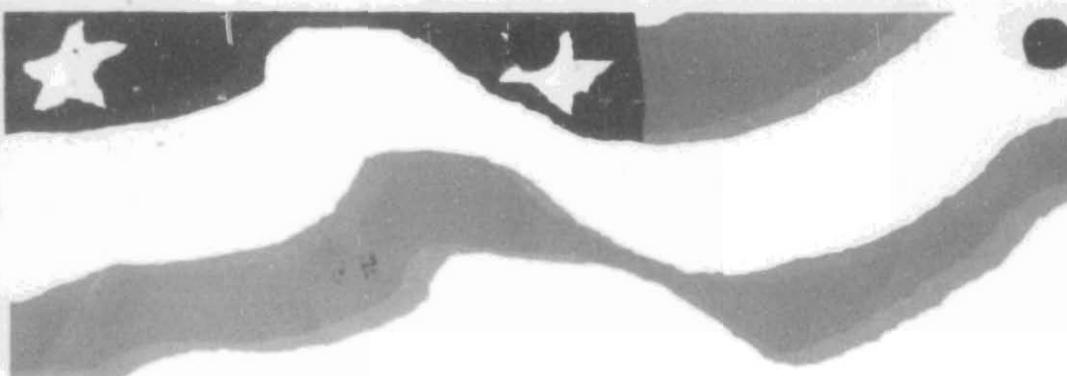
MUR 2757

Complaint dated 10/28/88
through

Response dated 12/08/88

Merged with MUR 2767 05/27/89

93043500719



OGC#824

Dukakis Bentsen

National Office: 105 Chauncy Street
Boston, MA 02111 (617) 451-2480

Thur 2757

October 28, 1988

Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

HAND DELIVERED

88 OCT 31 AM 10:22

RECEIVED
FEDERAL ELECTION COMMISSION

Dear Mr. Noble:

Enclosed, please find a complaint by the Dukakis/Bentsen Committee, Inc. against Bush/Quayle '88, et. al. regarding "Greeks for Bush." We have sent an original, notarized complaint, along with three copies.

Sincerely,

Daniel A. Taylor
Daniel A. Taylor
General Counsel

cc: Jan W. Baran,
Bush/Quayle '88

88 OCT 31 PM 11:41

93043500720

HAND DELIVERED
FEDERAL ELECTION COMMISSION
MAIL ROOM

88 OCT 31 AM 10:22

BEFORE THE FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

Complainant:
Dukakis/Bentsen Committee, Inc.

: MUR No. _____

Respondents:
Bush/Quayle '88
Rep. Michael Bilirakis
Rep. George Gekas
Rep. Olympia Snowe
William P. Tavoulareas
William Chirgotis
Alec P. Courtelis
Adeline Geo-Karis
John N. Parker
Dr. Theodore Perros
Dr. John Skandalakis
Kris Anne Vogelpohl

COMPLAINT

:

:

:

THE DUKAKIS/BENTSEN COMMITTEE, INC., pursuant to 2 U.S.C. Sec. 437g(a)(1), herewith submits the following complaint alleging a violation of the statutes and regulations of the Federal Election Law.

1. Complainant, Dukakis/Bentsen Committee Inc., maintains headquarters at 105 Chauncy Street, Boston, Massachusetts 02111.
2. Respondent, Bush/Quayle '88, has its headquarters at 733 15th Street, N.W., Suite 800, Washington, D.C. 20005.
3. All other respondents also have an office at 733 15th Street, N.W., Suite 800, Washington, D.C. 20005.
4. Under the name of "Coalition of American Nationalities," respondents have distributed a letter soliciting contributions for "Greek Americans for Bush."
5. This letter is written on what appears to be "Bush/Quayle '88" stationery. Each individual respondent is listed on the letter as a various "chair" of "Greek Americans for Bush." The address for "Greek Americans for Bush" is the same as Bush/Quayle '88. The telephone numbers for both organizations are the same. The letter states that it was "paid for by Bush/Quayle '88." A true and accurate copy of this letter is attached.
6. The letter states that "we are seeking contributions" and indicates that contributions will be used to place "ads in the 13

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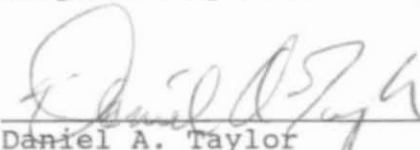
Greek publications throughout the country" on behalf of the candidacy of George Bush. This letter, then, is an attempt to seek contributions and make expenditures directly by Bush/Quayle '88 or by a committee which is clearly not independent, and perhaps is not even organized with the Federal Election Commission.

7. In accordance with 26 U.S.C. 9003(b)(2) and 11 C.F.R. 9003.2(a)(2), both Vice President Bush and Senator Quayle personally signed a certification agreeing that their campaign has not and will not accept contributions. However, any funds raised by this solicitation will be illegal under both 26 U.S.C. 9003(b)(2) and 11 CFR 9003.2(a)(2). The stated intent to expend the funds raised is also illegal under the same authority. Further, since the purpose of the solicitation is illegal, all expenditures for its distribution are impermissible under 2 U.S.C. 441a(f)

On the basis of the foregoing, the undersigned, on behalf of the Dukakis/Bentsen Committee, Inc. and its Treasurer, request that the Federal Election Commission:


1. Conduct an immediate investigation into the complained acts of Bush/Quayle '88 and all other respondents.
2. Impose any and all appropriate penalties on account of any violation.

Respectfully Submitted,


Daniel A. Taylor
General Counsel

Commonwealth of Massachusetts
County of Suffolk

Sworn to and subscribed before me by the above named individual on this 25th day of October, 1988.


Notary Public

My Commission expires _____.

93043500722

Bush 88 Quayle

Coalition of American Nationalities

DEAR HELLENE:

On November 8, Americans will go the polls to elect a new President. Each of us has the responsibility to evaluate the qualifications of the nominees and then to vote for the person who is best suited to lead the nation for the next four years.

Greek Americans

Honorary Chairs

Rep. Michael Bilirakis
Rep. George Gekas
Rep. Olympia Snowe
William P. Tavoulareas

Chair

William Chirgotis

Co-Chairs

Alec P. Courtelis
Adeline Geo-Karis
John N. Parker Esq.
Dr. Theodore Perros
Dr. John Skandalakis

Vice Chair

Kris Anne Vogelpohl

I am an American of Greek descent, and very proud of my heritage. Throughout my professional career as an architect, I have always participated actively in community affairs, the programs of my Church, and in the Order of Ahepa for which I was privileged to serve as the Supreme President. I mention this not for any self-serving purpose but merely to acquaint you, with my background.

Governor Dukakis has frequently spoken of his Greek heritage. We all are justifiably proud that a Hellene has been nominated for the highest office in the land. But that alone should not be the criterion by which selection to the Presidency should be made. Experience as a Governor cannot be compared to service in Congress, Director of the CIA, and eight years as Vice President which George Bush has experienced. But more importantly, the achievements of the Reagan-Bush ticket, during the past eight years, in reducing taxes, unemployment, interest rates, inflation, and successes in foreign affairs including a treaty with the Soviet Union for reduction of nuclear weapons, all of these and more, has convinced me that George Bush must be elected President.

Because I and other Greek-Americans wish to convey this message to the Greek-American community, we are seeking contributions from all who endorse our position to defray the costs for placements of ads in the 13 Greek publications throughout the country. A contribution payable to "Greek Americans for Bush" is respectfully and urgently solicited. For your convenience a self-addressed envelope is herewith enclosed. An itemized record of receipts and expenses will be mailed to you after the election.

Sincerely,

William G. Chirgotis
William G. Chirgotis

\$10.00 \$25.00 \$50.00 \$100.00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1988

SPECIAL DELIVERY

William Chingotis, Chair
Greek-Americans For Bush
700 15th Street, NW
Suite 800
Washington, DC 20005

RE: MUR 2757
Greek-Americans For
Bush
The Honorable Michael
Bilirakis
The Honorable George
Gekas
The Honorable Olympia
Snows
William F. Tavoulareas
Alec P. Countellis
Adeline Geo-Karis
John N. Parker
Dr. Theodore Perros
Dr. John Skandalakis
Kris Anne Vogelpohl

Dear Mr. Chingotis:

This letter is to notify you that on October 31, 1988, the Federal Election Commission received a complaint which alleges that you, Greek-Americans For Bush, and those persons mentioned above may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2757. 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. You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response, we have enclosed a pre-addressed, postage paid, special delivery envelope. If no response is received within 15 days, the Commission may take further action based on the available information.

93043500724

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.

If you have any questions, please contact James Brown at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

By: 
Lois G. Lerner
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope
Form

93043500825



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 1, 1988

SPECIAL DELIVER

Mr. A. Taylor
General Counsel
House Bipartisan Committee
100
105 Chauncy Street
Boston, MA 02111

RE: MUR 2757

Dear Mr. Taylor:

This letter acknowledges receipt on October 31, 1988, of your complaint against BUSH - QUAYLE '88 and J. Stanley Huckaby, as treasurer, Greek-Americans For Bush, et al., alleging violation of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within 24 hours. You will be notified as soon as the Commission takes final action on your complaint. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Please be advised that this matter shall remain confidential in accordance with 2 U.S.C. Sections 437g(a)(4)(B) and 437g(a)(3)(B) unless the respondents notify the Commission in writing that they wish the matter to be made public.

Sincerely,

Lawrence M. Noble
General Counsel


By: Lois G. Lerner
Associate General Counsel

Enclosure
11/1/88

93043500726



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 1, 1988

SPECIAL DELIVERY

J. Stanley Huckaby, Treasurer
BUSH - QUAYLE '88
737 15th Street, NW
Washington, DC 20005

RE: MUR 2757
BUSH - QUAYLE '88
and J. Stanley
Huckaby, as treasurer

Dear Mr. Huckaby:

This letter is to notify you that on October 31, 1988, the Federal Election Commission received a complaint which alleges that BUSH - QUAYLE '88 and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended. The "Act" is a copy of the complaint is enclosed. We have numbered this letter MUR 2757. 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 and BUSH - QUAYLE '88 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. You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response, we have enclosed a one-addressed, postage paid, special delivery envelope. If no response is received within 15 days, the Commission may take further action based on the available information.

The complaint may be dismissed by the Commission prior to the receipt of your response if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by overnight express mail.

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public.

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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.

If you have any questions, please contact James Brown at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

By: 
Lois G. Lerner
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope
Form

93043500728

88 NOV -1 PH 3:14

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

SENSITIVE

EXPEDITED FIRST GENERAL COUNSEL'S REPORT

MUR: 2757
STAFF: J. Albert Brown

COMPLAINANTS: Dukakis/Bentsen Committee, Inc.

RESPONDENTS: Bush/Quayle '88
Rep. Michael Bilirakis
Rep. George Gekas
Rep. Olympia Snowe
William P. Tavoulareas
William Chirgotis
Alec P. Courtelis
Adeline Geo-Karis
John N. Parker
Dr. Theodore Perros
Dr. John Skandalakis
Kris Anne Vogelpohl

SUMMARY OF ALLEGATIONS

The Complainant alleges that the Bush/Quayle '88 Committee, and the other Respondents listed above ("Bush/Quayle"), violated 26 U.S.C. 9003(b)(2) and 11 C.F.R. 9003.2(a)(2) by seeking contributions to place advertisements in support of the Bush/Quayle candidacy. In support of these allegations Complainant submits a letter on "Bush/Quayle '88" stationery. Each of the individual respondents is listed on the letter as a various "chair" of "Greek Americans for Bush." The return address in the letter to which contributions, made out to "Greek Americans for Bush," are requested to be sent is the same as the national Bush/Quayle '88 headquarters. The telephone number listed on the letter is also the Bush/Quayle '88 number. The letter states at the bottom that it was paid

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for by Bush/Quayle '88. The contributions sought by this solicitation letter are purported to be sought in order to defray costs for placement of advertisements supporting the Bush/Quayle ticket in United States Greek publications.

FACTUAL AND LEGAL ANALYSIS

In order to receive payments from the Presidential Election Campaign Fund established at 26 U.S.C. § 9006 presidential candidates sign written agreements certifying to the FEC that qualified campaign expenses, made by themselves or their authorized committees, will not be defrayed via solicited contributions after the candidate is nominated by a major party. In this way the presidential general election is meant to be paid for totally out of a limited public fund. See 26 U.S.C. §9003(b)(2). The only exception for which such presidential candidates or their authorized committees may make solicitations, is when contributions are "specifically solicited for, and deposited to, the candidate's legal and accounting compliance fund." 11 C.F.R. § 9003.2(a)(2).

In the present instance, as the authorized committee of the Republican Party's presidential and vice presidential candidates, Bush/Quayle '88 is bound by 26 U.S.C. § 9003 not to accept contributions to defray qualified campaign expenses. If the the money solicited by the letters in question is being used to place newspaper advertisements, there would then be a violation of the Act. If this is the true purpose for making the solicitations, Respondents are likely in violation of the Act.

93043500730

Further possible violations arise from the fact that there is no Greek Americans for Bush Committee registered and listed on the FEC Committee Cross Index as of October 18, 1988. This fact would indicate a violation of 2 U.S.C. § 433. It would seem from the facts presented by the Complainant that Greek Americans for Bush is not an independent committee from Bush/Quayle '88, but that fact is not definitely determinable until a response has been received from Bush/Quayle '88.


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The Office of the General Counsel's initial review of the complaint indicates that violations of 26 U.S.C. § 9003(b)(2), 11 C.F.R. 9003.2(a)(2), 2 U.S.C. § 433 or other sections of the Act and regulations may have occurred in connection with the alleged transactions noted above. Absent additional evidence and information, the exact nature of the violations is not clear. Therefore, the Respondents must be given the opportunity to respond to the allegations before this Office can make recommendations regarding this matter.

Lawrence M. Noble
General Counsel

11/1/88
Date

BY :


Lois G. Lerner
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Caw*
DATE: November 1, 1988
SUBJECT: MUR 2757 - First General Counsel's Report (Expedited)

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote	[]
Sensitive	[]
Non-Sensitive	[]
24 Hour No Objection	[X]
Sensitive	[X]
Non-Sensitive	[]
Information	[]
Sensitive	[]
Non-Sensitive	[]

Other [X]

Sensitive - circulate on _____

pink paper _____

DISTRIBUTION

Compliance	[X]
Audit Matters	[]
Litigation	[]
Closed MUR Letters	[]
Status Sheets	[]
Advisory Opinions	[]
Other (see distribution below)	[]

93043500732



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN *JM*

DATE: NOVEMBER 3, 1988

SUBJECT: MUR 2757
FIRST GENERAL COUNSEL'S REPORT
SIGNED NOVEMBER 1, 1988

The above-captioned report was received in the Secretariat at 3:24 p.m. on Wednesday, November 2, 1988 and circulated to the Commission on an expedited no-objection basis at 4:00 p.m. on Wednesday, November 2, 1988.

There were no objections to the report.

93043500733

OGC# 1091

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

JAN W. BARAN
(202) 429-7330

November 17, 1988

TELECOPIER
(202) 429-7049
TELEX 248349 WYRN R

NOV 17 PM 4:22

Mr. Lawrence M. Noble, Esquire
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2757

Attn: James Brown

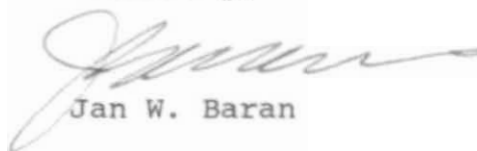
Dear Mr. Noble:

This office represents Bush-Quayle 88, Inc. and J. Stanley Huckaby, as treasurer ("Respondent"), in the above-captioned matter. An executed Statement of Designation of Counsel is attached hereto.

A response to this complaint is currently due on November 17, 1988. In order to fully confer with Respondent, and those agents of the campaign who live in other areas of the country but may be involved in this matter, and to obtain whatever information and documentation which may prove necessary with respect to this matter, I respectfully request a twenty day extension of time to and including December 7, 1988 within which to respond.

Your favorable consideration of this request will be appreciated.

Sincerely,



Jan W. Baran

JWB/slg
Enclosure

93043500734

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2757

NAME OF COUNSEL: Jan W. Baran

ADDRESS: Wiley, Rein & Fielding

1776 K Street, N.W.

Washington, D.C. 20006

TELEPHONE: (202) 429-7330

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

Date


Signature

RESPONDENT'S NAME: Stan Huckaby

ADDRESS: 733 15th Street, N.W.

Washington, D.C. 20005

HOME PHONE: _____

BUSINESS PHONE: (202) 842-8800

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 21, 1988

Jan W. Baran
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C.
20006

RE: MUR 2757
BUSH - QUAYLE '88
and J. Stanley
Huckaby, as treasurer

Dear Mr. Baran:

This is in response to your letter dated November 17, 1988, which we received on November 17, 1988, requesting an extension of 20 days until December 7, 1988, to respond to the complaint filed against your client in MUR 2757. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on December 7, 1988.

If you have any questions, please contact Jim Brown, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

93043500736

OGC 1320

WILEY, REIN & FIELDING

1776 K STREET, N. W.
WASHINGTON, D. C. 20006
(202) 429-7000

December 8, 1988

JAN W. BARAN
(202) 429-7330

TELECOPIER
(202) 429-7049
TELEX 248349 WYRN UR

Lawrence M. Noble, Esquire
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attn: James Brown

Re: MUR 2757

Dear Mr. Noble:

This Response is submitted on behalf of Bush-Quayle 88, Inc., and J. Stanley Huckaby, as Treasurer ("Respondents"), in reply to a complaint filed by Daniel A. Taylor, and designated Matter Under Review ("MUR") 2757. For the reasons set forth herein, the Federal Election Commission should find no reason to believe that Respondents violated any provisions of either the Federal Election Campaign Act of 1971, as amended ("the Act") or the Presidential Election Campaign Fund Act ("the Fund Act").

The Complaint

The Complaint in this matter concerns a letter signed by William G. Chirgotis. The letter states that because Mr. Chirgotis "and other Greek-Americans wish to convey this message to the Greek-American community, we are seeking

93043500737

Lawrence M. Noble, Esquire
December 8, 1988
Page 2

contributions from all who endorse our position to defray the costs for placement of ads in the 13 Greek publications throughout the country. A contribution payable to 'Greek Americans for Bush' is respectfully and urgently solicited." Attachment to Complaint. Complainant states that "any funds raised by this solicitation will be illegal under both 26 U.S.C. 9003(b)(2) and 11 CFR 9003.2(a)(2)." Complaint at p. 2.

Response

The Fund Act

Section 9003(b)(2) of the Fund Act requires the candidates of a major party to certify that "no contributions to defray qualified campaign expenses have been or will be accepted by such candidates or any of their authorized committees . . ." Vice President Bush and Senator Quayle made this certification and received public funds for the general election campaign. Further, both the Vice President and Senator Quayle, as well as their one authorized campaign committee, Bush-Quayle 88, have strictly adhered to the limits of this certification.

The activity undertaken by Mr. Chirgotis was not activity authorized by Bush-Quayle 88. Respondents acknowledge that Mr. Chirgotis was the titular chairman of

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Lawrence M. Noble, Esquire
December 8, 1988
Page 3

93043500739

one of its National Coalitions, a volunteer position with no authority to act on behalf of the campaign. Each coalition chairman was given explicit instructions by the Director for National Voter Coalitions, Ceci Cole McInturff, that no fundraising could be done on behalf of Bush-Quayle '88. Affidavit of Ceci Cole McInturff in MUR 2757 (hereinafter "McInturff Aff.") at ¶¶ 4, 5. Moreover, coalition chairmen were told that if they did fundraising on behalf of local, State or national Republican Party entities, they were to do so on an individual basis and not as agents of Bush-Quayle '88. Id. at ¶ 5. The attached Memorandum to all National and State Coalition Leaders is illustrative of this point. Id. The memo was written to remind these individuals of the restraints imposed by the law of which they had previously been informed. Id. On the subject of fundraising, the memo states:

Any fundraising activity may be undertaken only by Victory '88, [a widely-used term for Republican Party fundraising activities] not by Bush-Quayle or its representatives. While you as a campaign volunteer are free, on an individual basis, to assist Victory '88's fundraising efforts, it should be understood that you are not doing so on behalf of Bush-Quayle. Furthermore, any funds raised for state party Victory '88 accounts may not be specifically "earmarked" for Bush-Quayle expenditures. Obviously funds must be raised in accordance with the applicable Federal

Lawrence M. Noble, Esquire
December 8, 1988
Page 4

and state laws: Victory '88 legal counsel should be consulted as appropriate.

Attachment 1 of McInturff Aff. at pp. 1-2

The letter which is the subject of this complaint was therefore contrary to the above quoted explicit instructions of Bush-Quayle 88 and its Director for National Voter Coalitions.

Additionally, any money which may have been raised by the Chirgotis letter was not deposited into Bush-Quayle 88's general election campaign account, or into any account controlled by Bush-Quayle 88.¹

In addition, Bush-Quayle 88 made no expenditures in connection with this letter or any resultant advertisements placed by Mr. Chirgotis. This activity was not the activity of Bush-Quayle 88. Id. at ¶ 6. Mr. Chirgotis apparently disregarded explicit instructions given to him and was acting on his own in undertaking this activity. Bush-Quayle 88 cannot be held accountable for this unauthorized activity. Rather, Mr. Chirgotis was acting in his own behalf and without permission of the campaign in sending out the materials which are the subject of this MUR, not as an agent

¹ In fact, because the Complaint did not enclose a copy of the return envelope, it is not clear from the Complaint to whom the checks were sent or where. Respondents, however, received no funds which may have been raised as a result of Mr. Chirgotis' unauthorized letter.

93043500740

Lawrence M. Noble, Esquire
December 8, 1988
Page 5

of the campaign or in connection with the campaign. See id.
at ¶ 3.

Accordingly, the Commission should find no reason to
believe that Bush-Quayle 88, Inc. and J. Stanley Huckaby, as
Treasurer violated either the Act or the Fund Act.

Sincerely,

Jan W. Baran
Jan W. Baran

Carol A. Laham
Carol A. Laham

Counsel for Bush-Quayle 88
and J. Stanley Huckaby,
as Treasurer

Enclosures
cc: J. Stanley Huckaby

JWB/CAL:co

93043500741

BEFORE THE FEDERAL ELECTION COMMISSION

City of Washington)
District of Columbia)

MUR 2757

AFFIDAVIT OF CECI COLE MCINTURFF

CECI COLE MCINTURFF, being first duly sworn, deposes and says:

1. I am Ceci Cole McInturff. I served as Director for National Voter Coalitions for Bush-Quayle 88, Inc., the general election campaign committee ("campaign" or "committee") of Vice President George Bush and Senator Dan Quayle.

2. The National Voter Coalitions program for Bush-Quayle 88 involved grass roots coalitions of individuals who agreed to be publicly identified as supporters of George Bush. Coalition members volunteered their names and time, and were encouraged to recruit others to support Bush-Quayle. Examples of formal activities in which Coalition members were encouraged to participate included writing of Op-Ed pieces and Letters-To-The-Editor of local and specialty media.

3. The Coalition "leaders" or "officers" were non-elected, unpaid volunteers who agreed to assume these honorific positions because they were well-known in their

93043500742

local or ethnic communities. These individuals had no legal authority to act as agents of the campaign, to speak for the campaign, or to bind the campaign.

4. The individual members and officers of coalitions, and the coalitions collectively, had no authority to raise or spend funds on behalf of Bush-Quayle 88. In fact, the National Voter Coalitions Office for Bush-Quayle 88 issued specific written instructions to Coalition leaders on at least two occasions forbidding them from raising funds on behalf of Bush-Quayle 88. None of the coalitions had any authority to expend any funds on behalf of the campaign. The entire coalition operation had a minimal budget, and such budgeted funds as this division of the campaign had could only be expended by the National Office under my control and direction.

5. Coalition members were encouraged to contact their local state party organizations to provide assistance on an individual basis in local fundraising on behalf of state and local party activities, such as "Victory '88". However, volunteers were specifically told and reminded that fundraising could not be undertaken on behalf of Bush-Quayle. The attached memorandum is illustrative of this point.

6. Any fundraising activity engaged in by Coalition members was therefore not done on behalf of Bush-Quayle 88 and any funds expended by individual members of Greek-

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Americans for Bush-Quayle 88 were not expended with the authorization or direction of Bush-Quayle 88.

Ceci Cole McInturff
Ceci Cole McInturff

Signed and sworn to before me
this 9 day of December, 1988.

Katherine A. Moore
Notary Public

My Commission expires: 8-31-92

93043500744

Bush 88 Quayle

October 12, 1988

MEMORANDUM TO: ALL NATIONAL AND STATE COALITION LEADERS

FROM: CECI COLE MCINTURFF
DIRECTOR FOR NATIONAL VOTER COALITIONS

As we head into the last three and a half weeks of the campaign, I thought it might be useful to reiterate certain important principles and constraints imposed by Federal election law on Bush-Quayle coalition activities. While these requirements and limitations are no doubt familiar to most of you by now, they bear repeating to help ensure that the campaign is protected against any allegations of wrongdoing in these final, critical days.

First, we should always bear in mind that Bush-Quayle and Victory '88 are separate and distinct activities, subject to different legal requirements, performing different functions and serving related but independent purposes. Individual coalition members, like other volunteers (and unlike Bush-Quayle staff), may at different times act on behalf of either Bush-Quayle or Victory '88. You may not, however, act on behalf of both entities at one time. When you act on behalf of Bush-Quayle, you should always be mindful of the special constraints and requirements that Federal law as well as Bush-Quayle campaign policy place on your activities. If and when, on your own, you act in support of Victory '88 you should bear in mind that you are not at that point representing Bush-Quayle, as a Coalition member or otherwise.

All coalition members should bear in mind the following rules as they engage in various campaign activities:

1. Direction and Control of Victory '88

While Victory '88 offices are properly coordinating their activities with the campaign, all authority for Victory '88 programs and expenditures properly rests with state party officials.

2. Fundraising

Any fundraising activity may be undertaken only by Victory '88, not by Bush-Quayle or its representatives. While you as a campaign volunteer are free, on an individual basis, to assist Victory '88's fundraising

ATTACHMENT

93043500745

Memorandum to All National and
State Coalition Leaders
October 12, 1988
Page 2

efforts, it should be understood that you are not doing so on behalf of Bush-Quayle. Furthermore, any funds raised for state party Victory '88 accounts may not be specifically "earmarked" for Bush-Quayle expenditures. Obviously funds must be raised in accordance with the applicable Federal and state laws: Victory '88 legal counsel should be consulted as appropriate.

3. Travel Expenses

Travel expenses of Bush-Quayle employees and representatives must be paid by the campaign or (within a \$1000 per person ceiling) by the traveling individuals themselves. Victory '88 funds may not be used to pay for the travel of Bush-Quayle employees and representatives. Victory '88 may offer to pay for travel of individual Bush-Quayle coalition members, and such travel expenses may be accepted, only in those circumstances where the individual is appearing on behalf of Victory '88, the Republican National Committee or some other entity, not on behalf of Bush-Quayle. (A memorandum on the travel expenses of Bush-Quayle representatives is attached.)

4. Pamphlets, Brochures and other Distributional Materials

Victory '88 may reproduce Bush-Quayle campaign materials for dissemination by Victory '88 volunteers as Victory '88 deems appropriate (with appropriate disclaimers by Victory '88). Victory '88, however, should not be asked to pay Bush-Quayle bills for materials being prepared by Bush-Quayle coalitions for Bush-Quayle use.

Legal Guidance

State party officials and their legal counsel are working to ensure that Victory '88 activities are undertaken in accordance with applicable legal requirements. Questions regarding Victory '88 activities should be directed to them. All questions concerning the legal authority for Bush-Quayle coalition activities should be directed to the office of Jan W. Baran, General Counsel to Bush-Quayle: (202)383-4941. No one is authorized to provide legal advice or representation to Bush-Quayle without prior clearance by the General Counsel.

Begin MUR 2767

93043500747

06CH 874

BEFORE THE
FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION
88 NOV -4 AM 9:03

In the matter of the Complaint of:

Dukakis/Bentsen Committee, Inc.
101 Chauncey Street
Boston, Massachusetts 02111,

Complainant,

v.

Bush-Quayle '88 Committee
733 15th Street, N.W.
Washington, D.C. 20005

Arab-American Republican Federation
918 16th Street, N.W.
Suite 501
Washington, D.C. 20006,

Respondents.

MUR No. 2767

1. Complainant Dukakis/Bentsen Committee, Inc. brings this Complaint pursuant to 2 U.S.C. §437g(a)(1) to initiate an investigation into expenditures made by Respondent Arab-American Republican Federation (AARF) expressly advocating the election of George Bush as President. Since these expenditures by the AARF have, upon information and belief, been coordinated with Respondent Bush-Quayle '88 Committee, they constitute impermissible in-kind contributions by AARF to the Bush-Quayle Committee. AARF has violated the law in making, and the Bush-Quayle Committee has violated the law in accepting, such contributions.

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Introductory Allegations

2. According to an article in The New York Times dated October 29, 1988, the Arab-American Republican Federation (AARF) is an organization affiliated with the Arab American Institute. A copy of this New York Times article is attached to this Complaint as Exhibit A.

3. The Bush-Quayle '88 Committee is the authorized principal campaign committee for George Bush's 1988 general election campaign for President. The Committee has qualified for and received federal funds pursuant to the Presidential Election Campaign Fund Act, 26 U.S.C. 9001 et seq.

4. Pursuant to the Fund Act, in order to be eligible to receive federal funds, a candidate must certify that he will accept no contributions from any individual or political committee. 26 U.S.C. 9003(b). It is a violation of the Fund Act, with certain limited exceptions not applicable here, for any major party candidate receiving funds under the Fund Act to accept any private contribution to further his general election campaign for the Presidency. 26 U.S.C. 9012(b).

5. An organization may make independent expenditures on behalf of a presidential candidate receiving funds under the Fund Act. However, in order to qualify as an "independent

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expenditure," the expenditure must not be made "with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of, a candidate or any agent or authorized committee of such candidate." 11 CFR 109.1(a)

6. The Commission's regulations state that an expenditure is coordinated with a candidate, and hence is not independent, if it is, inter alia, "made by or through any person 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." 11 CFR 109.1(b)(4)(i)(B).

7. Any expenditure which does not qualify under the Commission's regulations as an independent expenditure is an in-kind contribution to the candidate on whose behalf it is made, and to the candidate's authorized committee. 11 CFR 109.1(c).

Statement of Claim

8. By letter dated October 19, 1988, AARF mailed material to numerous individuals expressly advocating the election of George Bush as President. A copy of the AARF letter is attached to this Complaint as Exhibit B. According to the article in The New York Times dated October 29, 1988, see Exhibit A, AARF mailed this letter to approximately 1,000 persons.

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Although Complainant does not know whether AARP is a membership organization, it is clear in the October 19 letter that at least some, if not all such letters were sent to non-members of AARP.

9. The AARF letter was signed by two individuals, one of whom was Charles Zogby. Upon information and belief, Zogby is an officer or agent of the Bush-Quayle '88 Committee, and has the official title of "Coalition Director for Ethnics" for the Committee. Further, Zogby has apparently been affiliated with the Republican Party since at least 1985. See "Arab Americans Join Republican Council" by States News Service, June 5, 1985, attached to this Complaint as Exhibit C.

10. The expenditure of funds by the AARF for its October 19 mailing expressly advocating the election of George Bush was accordingly made by or through a person who is an officer of, receiving compensation or reimbursement from, or officially working for the Bush-Quayle Committee. Under the Commission's regulations, the AARF expenditure is presumptively considered to be made with the cooperation or prior consent of, or in consultation with the Bush-Quayle Committee, and is thus not an independent expenditure. Because the expenditure of funds by the AARF in expressly advocating George Bush's election as President cannot qualify as an independent expenditure, AARF's expenditure is an in-kind contribution by AARF to the Bush-Quayle Committee.

11. The AARF has violated the Fund Act by coordinating or consulting with the Bush-Quayle Committee concerning AARF's October 19 mailing, and thereby making a contribution to the Bush-Quayle Committee.

12. The Bush-Quayle Committee has violated the Fund Act by coordinating or consulting with AARF concerning AARF's October 19 mailing, and thereby accepting a contribution from AARF.

WHEREFORE, Complainant urges the Commission to initiate an investigation into aforesaid violations of law, to take prompt and effective action to ensure that such violations do not recur and to impose appropriate penalties upon respondents.

Respectfully submitted,

Dukakis/Bentsen Committee, Inc.

By: Carol C. San

Counsel for Dukakis/Bentsen
Committee, Inc.

VERIFICATION

Boston)
) ss:
Massachusetts)

93043500753

In accordance with 11 CFR 111.4(b), I hereby verify that I am authorized to file this Complaint on behalf of the Dukakis/Bentsen Committee, Inc. that the factual statements in the Complaint are based on the information set forth in the exhibits accompanying the Complaint and upon my information and belief, that the exhibits are true and correct copies of the documents described in the Complaint and that I believe that the factual statements in the Complaint are correct, subject to the accuracy of such exhibits and reports.

Carol Sam

Subscribed and sworn to before me this 3rd day of November, 1988.

Daniel D. Toph
Notary Public
My Commission Expires: February 6, 1992

NEW YORK TIMES
10/29/88

Dukakis Is Questioning Bush On Letter to Arab-Americans

By E. J. DIONNE Jr.

Special to The New York Times

WASHINGTON, Oct. 28 — The campaign of Gov. Michael S. Dukakis today called upon Vice President Bush to disavow a mailing sent to Arab-Americans charging that Mr. Dukakis would be "no more than Israel's errand boy."

Ed Rogers, a spokesman for the Bush campaign, said: "The letter was not cleared by this campaign. We did not know about the letter. And based upon what we have heard about the letter without having seen it, it does not represent the views of this campaign."

The letter, mailed to about 1,000 Arab-American Republicans by the Arab-American Republican Federation, was sent out over the name of former Representative Paul Findley, an Illinois Republican who is a strong critic of United States policy in the Middle East. The letter describes Mr. Dukakis as "a dangerous novice in foreign policy."

"Given this handicap and the enormous financial support he is accepting from pro-Israel political action committees," the letter said, "he could, as President, be no more than Israel's errand boy."

The letter said Mr. Bush "has witnessed first-hand the frequent and substantial damage Israel's lobby causes our national interests."

A Challenge to Bush

Mr. Findley could not be reached to comment on the letter; several calls to his home and office tonight were answered by a recording.

Leslie Dach, the Dukakis campaign's communications director, said: "The question for George Bush is: Does he

agree with the letter's conclusion about 'the frequent and substantial damage Israel's lobby causes to our national interests'? Mike Dukakis doesn't agree. If George Bush disagrees, he should disavow the letter."

Mr. Dach also disputed the letter's assertion about Mr. Dukakis taking money from pro-Israel political action committees, noting that Mr. Dukakis takes no money from any political action committees.

The "open letter to the Arab-American community from Congressman Paul Findley" was enclosed with another letter, dated Oct. 19, sent under the letterhead of the Arab-American Republican Federation. That letter, signed with the names of Charles Zogby and Mike Sarafa of the foundation, was a straightforward appeal for votes on behalf of Mr. Bush. It did not mention the Middle East, but referred to the enclosed letter from Mr. Findley.

The Federation is independent of the formal Republican Party apparatus and is affiliated with the Arab American Institute, according to Sally Ethelston, the institute's public affairs officer. She said the letters were sent to about 1,000 Arab-American Republicans.

The letter seemed to take the Bush campaign by surprise. Mark Goodin, a press spokesman, said "there's no need to disavow what we had no involvement in."

Referring to Mr. Dukakis, Mr. Goodin said: "If he has a beef with what Mr. Findley says, I suggest he take it up with Mr. Findley."

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Arab American
Republican
Federation



October 19, 1988

Dear Arab American Republican,

Election day is near, and as usual, all of us are surrounded by political activity. This year's presidential election will likely shape the future direction of our country for many years. That is why political involvement, especially voting, is so important.

In the past, many of us have rallied behind important causes. This year, we realize that the presidential campaign has not generated the expected enthusiasm. Yet, as an Arab American community, we must not use this as an excuse to remain on the sidelines. Our goal of full political empowerment for Arab Americans is more critical than ever.

With that in mind, we have forwarded some information that we feel will be helpful. Enclosed is an issue sheet outlining some of Vice President Bush's stances on important issues of concern to Arab Americans. Also enclosed is an open letter to Arab Americans from former Congressman Paul Findley explaining why he thinks George Bush is the best candidate for President. We hope this information will help you generate support for Vice President Bush. If we sit this one out, the only losers in the end will be ourselves. Remember, the big picture is Arab American political empowerment!

Therefore, we urge you to get involved - to take the lead in local and state efforts in your area. We encourage you to help organize Arab Americans in your community and to build relations with your local, county and state Republican parties. With a formalized and institutionalized presence, we will continue to make an impact long after 1988. Each year we are getting stronger, but we need to broaden our base and stay involved.

One way we can continue to organize is to build and expand the Arab American Republican Federation. Enclosed is a Federation brochure. Please take the time to join or renew your membership. The fee is minimal. This will greatly assist us in

keeping track of Arab American Republican affairs across the country and in the broadening and development of local Republican clubs or organizations.

Also included is a copy of a press release we sent out announcing the formation of the Arab American for Bush/Quayle Committee. Please feel free to call us with any comments or questions at (202) 429-9210. Your input and participation are greatly appreciated.

Sincerely,



Mike Sarafa



Charles Zogby

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AN OPEN LETTER TO THE ARAB AMERICAN COMMUNITY
FROM CONGRESSMAN PAUL FINDLEY ON THE
1988 PRESIDENTIAL ELECTION

Dear Friends,

While lacking Arab ancestry -- I wish I had some to brag about! -- I feel very much an Arab American in spirit. My endeavors for peace and justice in the Middle East since 1973, including my book, They Dare to Speak Out: People and Institutions Confront Israel's Lobby make me strongly sympathetic to Arab grievances.

As a 22-year Republican veteran of Congress, I recognize the crucial importance of U.S. policy in bringing, at long last, redress of these grievances. In fact, I am convinced that only resolute leadership by the next U.S. president will avert a terrible new calamity in the Middle East that may engulf the U.S. in war.

I have every confidence that George Bush will provide that leadership. I base my forecast on personal acquaintance covering more than 20 years and this includes private conversations and correspondences on the Arab-Israel dispute, several years ago. It is noteworthy that when I was under heavy attack by Israel's lobby in my ill-fated 1982 campaign, he resisted lobby pressure and spoke in my behalf at a home-district fundraiser.

He knows the Middle East and its cross-currents like the back of his hand. In our nation's most important ambassadorships, as director of the Central Intelligence Agency, and for the past eight years as Vice President, Mr. Bush has witnessed firsthand the frequent and substantial damage Israel's lobby causes to our national interests.

On the Democratic side, Michael Dukakis is a dangerous novice. Given this handicap and the enormous financial support he is accepting from pro-Israel political action committees, he could, as president, be no more than Israel's errand boy.

Don't be confused by last-minute campaign bombast. George Bush knows what must be done in the Middle East, and he has the strength and skill to succeed. You can count on him to assert effectively our own national interest when it diverges from Israel's, and Americans of Arab ancestry owe it to themselves to give him their utmost support.

Your friend,

Paul Findley

93043500757

June 5, 1985, Wednesday

LENGTH: 162 words

HEADLINE: Arab Americans Join Republican Council

BYLINE: States News Service

DATELINE: WASHINGTON

KEYWORD: mideast

BODY:

Arab Americans became the 43rd ethnic group to join the Republican Party's National Republican Heritage Groups Council on May 19. This membership will bring draw them more deeply into the inner workings of the Grand Old Party, said Charles Zogby, spokesman for the Arab American Institute. Arab-American groups have increasingly flexed their political muscle in both parties. But this recent action is another step in the assimilation into the political mainstream.

"It's the first time Arab Americans have a permanent structure in the party itself," Zogby said. "When things concerning ethnic issues come up at the White House, the Heritage Council is contacted."

The Arab American participants at the convention also submitted a resolution calling for the self-determination and freedom of the Palestinian and Lebanese people. When the Council submits its final report in a week or two, the Arab Americans will know if the resolution was accepted, Zogby said.

EXHIBIT C

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 7, 1988

SPECIAL DELIVERY

J. Stanley Huckaby, Treasurer
Bush - Quayle '88 Committee
701 14th Street, NW
Washington, DC 20005

RE: MJA 2767
Bush - Quayle '88
Committee and J. Stanley
Huckaby, as treasurer

Dear Mr. Huckaby:

This letter is to notify you that on November 4, 1988, the Federal Election Commission received a complaint which alleges that the Bush - Quayle '88 Committee and you, as treasurer, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended, and the regulations thereunder. The complaint is being processed by the Commission.

You are hereby notified that you have the right to appear at the Commission's hearing on this matter and to be heard in your own defense. You also have the right to be represented by counsel. If you wish to appear at the hearing, you must file a written statement with the Commission within 10 days of the date of this letter, stating whether you intend to appear and, if so, whether you wish to be represented by counsel.

If you do not file a statement within the 10-day period, the Commission will proceed with the hearing in your absence. The Commission's decision may be appealed to the United States District Court for the District of Columbia.

Very truly yours,
Federal Election Commission

Enclosure

93043500762

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

88 NOV -7 PM 2:05

SENSITIVE

EXPENDITED FIRST GENERAL COUNSEL'S REPORT

MUR: 2767
STAFF: Morgan

COMPLAINANT: Dukakis/Bentsen Committee, Inc.
RESPONDENTS: Bush-Quayle '88 Committee and J. Stanley Huckaby,
as treasurer
Arab-American Republican Federation

SUMMARY OF ALLEGATIONS

The Office of the General Counsel received a complaint on November 4, 1988, from the Dukakis/Bentsen Committee, Inc. Named as respondents are the Bush-Quayle '88 Committee (the "Committee") and the Arab-American Republican Federation ("AARF"). The complaint alleges that respondent AARF made expenditures expressly advocating the election of George Bush. These expenditures are alleged to have been coordinated with the respondent Committee, therefore, constituting an impermissible in-kind contribution by the AARF to the Bush-Quayle '88 Committee. The complaint also alleges that the Committee has violated the law in accepting the contribution.

PRELIMINARY FACTUAL AND LEGAL ANALYSIS

Pursuant to 26 U.S.C. § 9003(b), for a presidential candidate to be eligible to receive federal funds, he or she must certify that contributions from any individual or political

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committee will not be accepted. However, an organization may make independent expenditures on behalf of a presidential candidate receiving funds under Title 26 of the United States Code. In order to qualify as an "independent expenditure," the expenditure must not be made "with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of, a candidate or any agent or authorized committee of such candidate." 11 C.F.R. 109.1(a). Expenditures that do not qualify under the Commission's Regulations as independent are in-kind contributions to the candidate on whose behalf they are made as well as expenditures by the candidate. 11 C.F.R. § 109.1(c).

The complaint in the instant case raises issues of fact as to whether AAFR made an in-kind contribution, in violation of the Act and Commission Regulations, to the Bush-Quayle '88 Committee by coordinating and consulting with this Committee on a communication expressly advocating the election of George Bush. In addition, issues of fact are presented as to whether the Committee violated the Act by receiving an in-kind contribution through such alleged coordinating and consulting with AAFR. Therefore, respondents must be afforded the statutorily-mandated

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fifteen day time period to reply to the allegations raised in the complaint. Accordingly, this Office will report to the Commission after the expiration of that period.

Lawrence M. Noble
General Counsel

Date

11/7/88

BY:


Lois G. Lerner
Associate General Counsel

93043500766



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cow*
DATE: November 7, 1988
SUBJECT: MUR 2767 - First General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote []
Sensitive []
Non-Sensitive []

24 Hour No Objection [X]
Sensitive [X]
Non-Sensitive []

Information []
Sensitive []
Non-Sensitive []

Other [X]

DISTRIBUTION

Compliance [X]

Audit Matters []

Litigation []

Closed MUR Letters []

Status Sheets []

Advisory Opinions []

Other (see distribution below) []

Sensitive - circulate on

pink paper



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN

DATE: NOVEMBER 8, 1988

SUBJECT: MUR 2767
FIRST GENERAL COUNSEL'S REPORT
SIGNED NOVEMBER 7, 1988

The above-captioned report was received in the Secretariat at 2:05 p.m. on Monday, November 7, 1988 and circulated to the Commission on a ~~24-hour~~ no-objection basis at 4:00 p.m. on Monday, November 7 1988.

There were no objections to the report.

93043500768

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE

88 NOV 15 AM 8:39

BEFORE THE
FEDERAL ELECTION COMMISSION

In the matter of the Complaint of:

Dukakis/Bentsen Committee, Inc.
105 Chauncey Street
Boston, Massachusetts 02111

Complainant,

v.

Bush-Quayle '88 Committee
733 15th Street, N.W.
Washington, D.C. 20005Arab-American Republican Federation
918 16th Street, N.W.
Suite 501
Washington, D.C. 20006,

Respondents.

MUR No. 2767

SUPPLEMENT TO COMPLAINT

On November 11, 1988, Complainant Dukakis/Bentsen Committee, Inc. filed a Complaint alleging that Respondent Arab-American Republican Federation (AARF) coordinated with Respondent Bush-Quayle '88 Committee in expending funds for a mailing containing express advocacy of George Bush's presidential campaign. The Complaint further alleged that such expenditures were in violation of the Presidential Election Campaign Fund Act, 26 U.S.C. 9001 et seq.

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Attached to the Complaint as Exhibit B was a copy of the AARF letter. Since the filing of the Complaint, it has come to Complainant's attention that an additional enclosure was included in the AARF mailing. This enclosure is referred to in Exhibit B, the AARF letter, as an "issue sheet outlining some of Vice President Bush's stances on important issues of concern to Arab-Americans." In order to provide the Commission with a full factual record in this matter, Complainant wishes to supplement its previous filing by submitting the additional enclosure mailed by AARF as part of the mailing which forms the basis for the Complaint. The enclosure is attached hereto as Exhibit D to the Complaint.

This enclosure reinforces Complainant's point that the AARF mailing contained express advocacy in support of the Bush campaign. The enclosure states, for instance, that Bush's views on Mideast issues "are stronger and more positive than that of his opponent." Because the mailing contained express advocacy on behalf of the Bush campaign, the coordination of the mailing between AARP and the Bush-Quayle Committee constituted an illegal in-kind contribution, as alleged in the Complaint.

Respectfully submitted,

Dukakis/Bentsen Committee, Inc.

By: Carol Dan

Counsel for Dukakis/Bentsen
Committee, Inc.

VERIFICATION

Washington)
) ss:
District of Columbia)

9 3 0 4 3 5 0 0 7 7 1

In accordance with 11 CFR 111.4(b), I hereby verify that I am authorized to file this Supplement to Complaint on behalf of the Dukakis/Bentsen Committee, Inc., that the factual statements in the Supplement to Complaint are based on information set forth in the exhibits accompanying the Complaint and upon my information and belief, that the exhibit is a true and correct copy of the document described in the Supplement to Complaint and that I believe that the factual statements in the Supplement to Complaint are correct, subject to the accuracy of such exhibits and reports.

Carol Dan

Subscribed and sworn to before me this 14th day of November, 1988

Wanda D. Purgason
Notary Public

My Commission expires

3/31/93

VICE PRESIDENT GEORGE BUSH ON ISSUES OF CONCERN TO ARAB AMERICANS

Arab Americans face a choice between two very different candidates this November when they go to the polls to determine who will lead this nation for the next four years. But there is only one candidate whose record and message of traditional values, of God, family and economic opportunity reflect the values of Arab Americans. That candidate is George Bush. Below are George Bush's positions on issues of concern to Arab American voters.

o The Middle East Peace Process

While Arab Americans have expressed concern over George Bush's Middle East policy, statements the Vice President has made on the issue are stronger and more positive than that of his opponent. While George Bush has said that he does not support a Palestinian state, he has at the same time stated that if the parties to any negotiations agree that there should be a state that he would not oppose it. George Bush also opposes moving the U.S. Embassy to Jerusalem. Michael Dukakis says he supports the move.

"The Palestinians must be involved at every step in the negotiations. There will be no peace without them. But we must be clear on another matter too. The annexation of the territories by Israel or their permanent control by military occupation" will not lead to peace. 9/7/88

o Lebanon

George Bush is committed to an independent, peaceful and democratic Lebanon. George Bush believes that U.S. policy should be based on the principles of preserving the unity of Lebanon; recognition of and respect for the territorial integrity of Lebanon and the reassertion of Lebanese sovereignty. George Bush has stated that he has a personal, special investment in a Lebanon at peace.

o George Bush on Values, the Individual and Family

"My view of America's future... means viewing government as the last, not the first, recourse in solving problems. I believe, as did Jefferson and Lincoln, that the sole purpose of government is to do for people what they can't do for themselves; that political and social freedom is tied to economic freedom; and that the proper role of a President is to develop a domestic and social agenda to improve the quality of American life through a free, competitive market place, not only of products but ideas... Each individual is entitled to a fair opportunity to fulfill his or her God-given potential." From "Looking Forward" by George Bush

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Page 2

o George Bush on Racism and Bigotry

"I hope to stand for a new harmony, a greater tolerance. Racism has no place in American society. We've come far, but I think we need a new harmony among the races in our country. We're on a journey to a new century, and we've got to leave the tired old baggage of bigotry behind. I want a kinder, gentler nation." 8/18/88

o George Bush on Business and the Economy

George Bush is committed to keeping our economy on the path that has created 18 million new jobs, the majority of these jobs coming from growth in small businesses. George Bush is the only candidate that has promised NOT TO RAISE TAXES. George Bush supports a balanced budget amendment to the constitution, the line-item veto to reduce spending and a cut in the capital gains tax rate to encourage investment and business formation.

o George Bush on Education

"Our program for the future must be built around a strategy of investing in our children. Support for educational excellence will be a primary goal of a Bush Administration because teachers, schools, colleges and universities are so vitally important to the character, strength, and quality of our society and nation." George Bush Issue Statement, 1980

George Bush believes America must invest in education and supports an emphasis on the basics, seeking to strengthen our traditional educational values. George Bush proposes college tax-free savings bonds to help families save for their children's college education. George Bush supports the right for children to pray in school.

o George Bush on Crime and Drugs

"Fighting crime must be a high priority for the next four years. Let's close the loopholes that let crooks go free to repeat their offenses. I want to stop hamstringing our police. Let's strengthen the laws that protect the victim, not the criminal." George Bush Issue Statement, 1980

George Bush supports mandatory sentencing for criminals, has said no to furloughs for killers and will appoint judges who will crack down on criminals. George Bush also supports drug education as part of the curriculum at every level of the public schools.

Arab American Supporters for George Bush
918 16th Street, NW, Suite 501
Washington, DC 20006

93043500773



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 21, 1988

Dukakis/Bentsen Committee, Inc.
105 Chauncey Street
Boston, Massachusetts 02111

RE: MUR 2767

Gentlemen:

This letter acknowledges receipt on November 15, 1988, of the supplement to the complaint you filed on November 4, 1988, against the Bush-Quayle '88 Committee and the Arab-American Republican Federation. The respondents will be sent copies of the supplement. You will be notified as soon as the Federal Election Commission takes final action on your complaint.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in dark ink, appearing to read "Lois G. Lerner", is written over a rectangular area.

BY: Lois G. Lerner
Associate General Counsel

93043500774



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 21, 1988

J. Stanley Huckaby, Treasurer
Bush-Quayle '88 Committee
733 15th Street, N.W.
Washington, D.C. 20005

RE: MUR 2767
Bush-Quayle '88 Committee

Dear Mr. Huckaby:

On November 7, 1988, you were notified that the Federal Election Commission received a complaint from the Dukakis/Bentsen Committee alleging violations of certain sections of Chapters 95 and 96 of Title 26, U.S. Code. At that time you were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

On November 15, 1988, the Commission received additional information from the complainant pertaining to the allegations in the complaint. Enclosed is a copy of this additional information.

If you have any questions, please contact Keith Morgan, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in dark ink, appearing to be "L. G. Lerner", is written over a horizontal line. The signature is fluid and cursive.

BY: Lois G. Lerner
Associate General Counsel

Enclosure

93043500775



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 21, 1988

Arab-American Republican Federation
918 16th Street, N.W.
Suite 501
Washington, D.C. 20006

RE: MUR 2767
Arab-American Republican
Federation

Gentlemen:

On November 7, 1988, you were notified that the Federal Election Commission received a complaint from the Dukakis/Bentsen Committee alleging violations of certain sections of Chapters 95 and 96 of Title 26, U.S. Code. At that time you were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

On November 15, 1988, the Commission received additional information from the complainant pertaining to the allegations in the complaint. Enclosed is a copy of this additional information.

If you have any questions, please contact Keith Morgan, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in dark ink, appearing to be "L. Lerner", written over a horizontal line.

BY: Lois G. Lerner
Associate General Counsel

9304350,0776

BEFORE THE
FEDERAL ELECTION COMMISSION

060 1143
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE
08 NOV 22 PM 12:33

In the matter of the Complaint of:

Dukakis/Bentsen Committee, Inc.
101 Chauncey Street
Boston, Massachusetts 02111,

Complainant,

v.

MUR. No. 2767

Bush-Quayle '88 Committee
733 15th Street, N.W.
Washington, D.C. 20005

Arab-American Republican Federation
918 16th Street, N.W., Suite 501
Washington, D.C. 20006

Respondents.

Affidavit of Charles Zogby in Response to
Complaint Filed by Dukakis/Bentsen Committee, Inc.

City of Washington)
District of Columbia) ss:

Charles Zogby, being duly sworn on oath, states as follows:

1. I am the National Secretary of the Arab-American Republican Federation ("AARF"), a respondent in the above-referenced matter. I have personal knowledge of the facts set forth herein, and I make this affidavit to demonstrate that AARF did not violate the Federal Election Campaign Act ("FECA").

2. AARF is an unincorporated association whose objectives are to bring Americans of Arab extraction into the

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Republican Party and to provide an opportunity for them to find political expression and recognition; to train Arab-Americans as effective political workers; and to collect, analyze and disseminate information concerning political affairs.

3. The Dukakis/Bentsen Committee alleges in its Complaint that the expenditure of funds by AARF for the purpose of mailing a letter to Arab American Republicans, which letter was signed by two people including myself, expressly advocating the election of George Bush, represents an impermissible in-kind contribution to the Bush-Quayle '88 Committee and a violation of the Presidential Election Campaign Fund Act, because, as the Complaint wrongfully states, I was "an officer or agent" of, or that I was "receiving compensation or reimbursement from", or that I was "officially working" for the Bush-Quayle Committee.

4. I was not an officer of the Bush-Quayle '88 Committee within the meaning of 11 CFR 109.1(b)(4)(i)(B). My position with the campaign was that of a volunteer, and I had no control whatsoever over decision-making or policy matters. Furthermore, I was not authorized to receive or to authorize expenditure of funds. No campaign literature or other material disseminated to the public by the Bush-Quayle Committee bore my signature, and, indeed, the Committee's internal procedures forbade the issuance of any such communications under my name.

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5. The material that was sent by AARF and of which the Dukakis/Bentsen Committee complains made no reference to my role as a volunteer for the Bush-Quayle Committee, and no reasonable person could have concluded, on the basis of that material, that it was being distributed on behalf of such Committee. The only reference to the Bush-Quayle Committee was a copy of an October 20, 1988 press release that was in the public domain and was not prepared for the purpose of dissemination by AARF. Moreover, the dissemination of the material by AARF was neither authorized by, nor coordinated with, the Bush-Quayle Committee.

6. My position with the Bush-Quayle Committee does not fall within the definition of the term "agent", as defined in 11 CFR 109.1(b)(ii)(5). The regulation states that agent means "any person who has actual or written authority, either express or implied, to make or authorize the making of expenditures on behalf of a candidate . . . or who has been placed in a position within the campaign organization where it would reasonably appear that in the ordinary course of campaign-related activities he . . . may authorize expenditures". 11 CFR 109.1(b)(ii)(5). I was in no way empowered or authorized, nor did either I or the Bush-Quayle Committee or any of its agents, at any time, in any way, represent that I had authority to authorize expenditures of funds.


6. I joined the Bush Campaign as a volunteer after having decided that George Bush's position on various issues, as

well as the values he is defending, made him the best qualified candidate to become President of this country. My contribution to the Bush Campaign was not financially compensated nor remunerated in any manner. I was not reimbursed for any expenditures made for or in behalf of the Bush-Quayle Committee, and the only reimbursement I received was in the amount of about \$150 to cover travel expenses.

Arab American Republican Federation

By: 
Charles Zogby

Subscribed and sworn to before me this 21st day of November, 1988.


Notary Public

My Commission Expires: My Commission Expires September 30, 1991

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RECEIVED
FEDERAL ELECTION COMMISSION

WILEY, REIN & FIELDING

88 NOV 28 AM 11:13

1776 K STREET, N. W.
WASHINGTON, D. C. 20006
(202) 429-7000

JAN W. BARAN
(202) 429-7330

November 17, 1988

TELECOPIER
(202) 429-7049
TELEX 248349 WYRN UR

Mr. Lawrence M. Noble, Esquire
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2767

Attn: Keith Morgan

Dear Mr. Noble:

This office represents Bush-Quayle 88, Inc. and J. Stanley Huckaby, as treasurer ("Respondent"), in the above captioned matter. Enclosed please find an executed Statement of Designation of Counsel which confirms our representation.

A response to this complaint is currently due on November 28. In order to fully confer with Respondent and to obtain whatever information and documentation which may prove necessary with respect to this matter, I respectfully request a three week extension of time to and including December 19, 1988 within which to respond.

Your favorable consideration of this request will be appreciated.

Sincerely,



Jan W. Baran

JWB/slg
Enclosure

88 NOV 29 AM 11:21

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STATEMENT OF DESIGNATION OF COUNSEL

MUR

2767

NAME OF COUNSEL:

Jan W. Baran

ADDRESS:

Wiley, Pein & Fielding

1776 K Street, N.W.

Washington, D.C. 20006

TELEPHONE:

(202) 429-7330

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

Date

11/18/89

Signature



RESPONDENT'S NAME:

Stan Huckaby

ADDRESS:

733 15th Street N.W.

Washington, D.C. 20005

HOME PHONE:

BUSINESS PHONE:

(202) 842-1988

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 1, 1988

Jan W. Baran, Esq.
Wiley, Rein and Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 2767
Bush-Quayle 88

Dear Mr. Baran:

This is in response to your letter dated November 17, 1988, which we received on November 28, requesting an extension until December 19, 1988 to respond to MUR 2767. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on December 19, 1988.

If you have any questions, please contact Keith V. Morgan, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

93043500783

DEC 1931
WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20008
(202) 429-7000

JAN W. BARAN
(202) 429-7330

December 21, 1988

TELECOPIER
(202) 429-7049
TELEX 248349 WYRN UR

Lawrence M. Noble, Esquire
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attn: Keith Morgan

Re: MUR 2767

Dear Mr. Noble:

93043500784
This Response is submitted on behalf of Bush-Quayle 88, Inc, and J. Stanley Huckaby, as Treasurer ("Respondent"), in reply to a complaint filed by the Dukakis/Bentsen Committee, Inc., and designated Matter Under Review ("MUR") 2767. For the reasons set forth herein, the Federal Election Commission should find no reason to believe that Respondents violated any provisions of the Federal Election Campaign Fund Act ("the Fund Act").

The Complaint

The Complaint in this matter alleges that expenditures made by the Arab-American Republican Federation (AARF) were coordinated with Bush-Quayle 88 and thus violated the law. The Complaint is based on the information and belief that Charles Zogby, one of two individuals who signed the AARF letter which is the subject of this complaint "is an officer or agent of the Bush-Quayle '88 Committee, and has the

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Lawrence M. Noble, Esquire
December 21, 1988
Page 2

official title of 'Coalition Director for Ethnics' for the Committee". The Complaint also alleges that the mailing was "made by or through a person who is an officer of, receiving compensation or reimbursement from, or officially working for the Bush-Quayle Committee."

On these grounds, complainant asserts that the mailing was made with the cooperation or prior consent of, or in consultation with the campaign and that the campaign therefore accepted an in-kind contribution from AARF.

See 11 C.F.R. § 109.1(c).

Response

The complaint in this matter is based on misinformation and incorrect belief. Complainant alleges that if Charles Zogby was an officer or agent of the campaign, then these expenditures would be in-kind contributions to the campaign. However, Mr. Zogby was neither an officer nor an agent of the campaign. Affidavit of Ceci Cole McInturff in MUR 2767 (hereinafter "McInturff Aff.") at ¶ 6. Rather, Mr. Zogby was an unpaid volunteer of the campaign with no authority to act on behalf of the campaign. Id. Mr. Zogby was not the "Coalition Director for Ethnics." Id. Furthermore, as a volunteer, he did not participate in any staff meetings of the National Office of Voter Coalitions and had no management

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Lawrence M. Noble, Esquire
December 21, 1988
Page 3

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authority within the campaign. Id. at ¶ 3. Mr. Zogby was, however, "familiar with the guidelines issued by the National Voter Coalitions Office for Bush-Quayle 88 which identified the legal restrictions on the activities of the coalitions and its volunteers." Id. at ¶ 4. "Any activity undertaken by the Arab-American Republican Federation was not done on behalf of Bush-Quayle 88." Id. at ¶ 7. Mr. Zogby had "no authority to act as an agent of the campaign, speak for the campaign, or to make any expenditures or in any way bind the campaign." Id. at ¶ 6. Further, "any funds expended by the Arab-American Republican Federation were not expended with the authorization, or at the direction, request, suggestion, or consultation of Bush-Quayle 88." Id. at ¶ 7. In fact, the "Office of Voter Coalitions did not learn of this activity until it heard of complaints by the Dukakis/Bentsen campaign regarding a letter sent by the Arab-American Federation." Id.

Since the factual premises on which this complaint was filed, that Mr. Zogby was an agent or officer of the Committee, or that he received compensation or reimbursement from the Committee, or that he was officially working for the Committee, are incorrect, its legal premise fails automatically. The expenditures at issue in this matter were "not made with the cooperation or with prior consent of, or

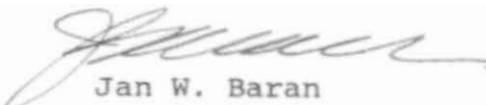
Lawrence M. Noble, Esquire
December 21, 1988
Page 4

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in consultation with, or at the request or suggestion of, a candidate or any agent or authorized committee of such candidate," 11 C.F.R. § 109.1(a), and were not in-kind contributions. Thus, Bush-Quayle 88 did not accept any contributions to defray qualified campaign expenses just as Vice President Bush and Senator Quayle certified that they and their authorized committee would not under 26 U.S.C. § 9003(b).

Accordingly, the Commission should find no reason to believe that Bush-Quayle 88, Inc. and J. Stanley Huckaby, as Treasurer violated either the Act or the Fund Act.

Sincerely,



Jan W. Baran



Carol A. Laham

Counsel for Bush-Quayle 88,
Inc. and J. Stanley Huckaby,
as Treasurer.

cc: J. Stanley Huckaby

JWB/CAL:co

BEFORE THE FEDERAL ELECTION COMMISSION

City of Washington)
)
District of Columbia)
) MUR 2767

AFFIDAVIT OF CECI COLE McINTURFF

CECI COLE McINTURFF, being first duly sworn, deposes and says:

1. I am Ceci Cole McInturff. I served as Director for National Voter Coalitions for Bush-Quayle 88, Inc., the general election campaign committee ("campaign" or "committee") of Vice President George Bush and Senator Dan Quayle.

2. At the national level, the National Voter Coalitions for Bush-Quayle 88 consisted of myself and several Deputy Directors who were paid by Bush-Quayle 88. However, the majority of the staff at the National Office of Voter Coalitions was comprised of strictly unpaid volunteers.

3. These volunteers did not participate in any staff meetings, nor did they have any management authority. The volunteers, in general, had no legal authority to act as agents of the campaign, to speak for the campaign, or to make expenditures or in any way bind the campaign.

4. In addition, volunteers were familiar with the guidelines issued by the National Voter Coalitions Office for Bush-Quayle 88 which identified the legal restrictions on the activities of the coalitions and its volunteers.

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5. I am familiar with the allegations contained in the complaint of Matter Under Review 2767 that Charles "Zogby is an officer or agent of the Bush-Quayle '88 Committee, and has the official title of 'Coalition Director for Ethnics' for the Committee." Complaint at ¶ 9. The complaint also alleges that Mr. Zogby was "receiving compensation or reimbursement from, or [was] officially working for the Bush-Quayle Committee." Id. at ¶ 10.

6. Mr. Zogby was not an officer or agent of the Bush-Quayle Campaign, nor did he have the official title of "Coalition Director for Ethnics." Rather, Mr. Zogby was strictly an unpaid volunteer for the Campaign with no authority to act as an agent of the campaign, speak for the campaign, or to make expenditures or in any way bind the campaign.

7. The activity engaged in by Mr. Zogby was done without the knowledge of Bush-Quayle 88. The Office of National Voter Coalitions did not learn of this activity until it heard of complaints by the Dukakis/Bentsen campaign regarding a letter sent by the Arab-American Republican Federation. The Bush-Quayle Campaign was obviously unable to control the actions of its volunteers outside of the campaign. Any activity undertaken by the Arab-American Republican Federation was not done on behalf of Bush-Quayle 88 nor coordinated with the campaign. Further, any funds expended by the Arab-American Republican Federation were not

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expended with the authorization, or at the direction,
request, suggestion, or consultation of Bush-Quayle 88.


Ceci Cole McInturff

Signed and sworn before me
this 21 day of December, 1988.


Notary Public

My commission expires: 8.31.92.

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EXECUTIVE SESSION

FEDERAL ELECTION COMMISSION

MAY 23 1989

FEDERAL ELECTION COMMISSION

999 E Street, N.W. MAY 11 PM 3:44
Washington, D.C. 20463

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

MURS: 2757 and 2767

Date Received by OGC: 10/31/88
and 11/4/88

Date of Notification to
Respondents: 11/1/88
and 11/7/88

Staff Member: Keith V. Morgan

COMPLAINANT: Dukakis/Bentsen Committee, Inc.

RESPONDENTS: Bush-Quayle 88 Committee and J. Stanley Huckaby
as treasurer

Greek Americans for Bush and William Chirgotis,
as chairman

Arab-American Republican Federation

RELEVANT STATUTES: 2 U.S.C. § 431(4)(A)
2 U.S.C. § 433(a)
2 U.S.C. § 434(a)
2 U.S.C. § 441a(a)(1)(A)
26 U.S.C. § 9003(b)
11 C.F.R. § 109.1(b)

INTERNAL REPORTS CHECKED: Public Disclosure Reports
Advisory Opinions

FEDERAL AGENCIES CHECKED: NONE

I. GENERATION OF MATTERS 2757 and 2767

On October 31, 1988, Daniel A. Taylor, General Counsel for the Dukakis/Bentsen Committee, Inc., filed a complaint (MUR 2757) against the Bush-Quayle 88 Committee and J. Stanley Huckaby, as treasurer (the "Committee"), and the Greek Americans For Bush. The complaint alleges that by mailing a particular letter Respondents violated 26 U.S.C. § 9003(b)(2) and 11 C.F.R. § 9003.2(a)(2), in that the letters solicited funds for the Bush-Quayle presidential campaign effort. Such a solicitation would be a violation of the Presidential Election Campaign Fund Act, as

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amended ("the Fund Act"), because of the candidates' certification that their campaign would not accept contributions in order to be entitled to public funds.

On November 4, 1988, the Dukakis/Bentsen Committee, Inc. filed another complaint (MUR 2767) against the Committee and the Arab-American Republican Federation ("AARF"). This complaint alleges that respondent AARF made expenditures expressly advocating the election of George Bush. These expenditures are alleged to have been coordinated with the Committee, therefore constituting an in-kind contribution by AARF to the Committee.

II. FACTUAL AND LEGAL ANALYSIS

A. The Law

Under the Fund Act, a major party presidential nominee may elect to receive full public financing of his or her general election campaign for president. See generally, 26 U.S.C. §§ 9001-9012. In order to qualify, the candidate must certify that contributions from individuals and political committees will not be accepted. 26 U.S.C. § 9003(b)(2). However, an independent political committee or individual may make independent expenditures on behalf of a presidential candidate receiving funds under the Fund Act. FEC v. National Conservative Political Action Committee ("NCPAC"), 470 U.S. 480, 493 (1985) and 2 U.S.C. § 431(17). In order to qualify as an "independent expenditure," the expenditure must not be made "with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of, a candidate or any

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agent or authorized committee of such candidate."

11 C.F.R. § 109.1(a). Expenditures that do not qualify under the Commission's regulations as independent are in-kind contributions to the candidate on whose behalf they are made as well as expenditures by the candidate. 11 C.F.R. § 109.1(c)

Commission regulations state that an expenditure is presumed coordinated with a candidate, and hence not independent, if it is, inter alia, "[b]ased on information about the candidate's 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" or "[m]ade by or through any person who is, or has been . . . receiving any form of compensation or reimbursement from the candidate, the candidate's committee or agent." 11 C.F.R. §§ 109.1(b)(4)(i)(A) and (B). See also AO 1979-80, 1 Fed. Election Camp. Fin. Guide [CCH] ¶5469, at p. 10,527. An "agent" is defined by Commission regulations as any person "who has actual oral or written authority, either express or implied, to make or to authorize the making of expenditures on behalf of a candidate, or means any person who has been placed in a position within the campaign organization where it would reasonably appear that in the ordinary course of campaign-related activities he or she may authorize expenditures." 11 C.F.R. § 109.1(b)(5).

A political committee under the Act is any committee or group of persons that receives contributions or makes expenditures aggregating in excess of \$1,000 during a calendar

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year. 2 U.S.C. § 431(4)(A). In accordance with section 433(a), each political committee must file a Statement of Organization. Section 434(a) also requires political committees to file periodic reports of receipts and disbursements. In addition, no person may contribute in excess of \$1,000 per election to any candidate for Federal office. 2 U.S.C. § 441a(a)(1)(A).

B. The Complaints and the Responses

1. MUR 2757

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Complainant submitted a copy of a letter written on stationery with the letterhead "Bush Quayle 88 Coalition of American Nationalities." The letter seeks contributions to "Greek Americans for Bush" so that advertisements supporting the Bush-Quayle candidacy may be placed in "the 13 Greek publications throughout the country." The letter is signed by William G. Chirgotis. At the bottom of the letter there is a disclaimer stating "Paid for by Bush Quayle 88," and the address of the Bush-Quayle 88 headquarters at 733 15th Street, N.W., Suite 800, Washington, D.C. 20005 is listed. Complainant notes that Bush-Quayle headquarters and Greek Americans for Bush shared a common address and phone number. Greek Americans for Bush is not an organization registered with the Federal Election Commission as a separate political committee

It is the complainant's position that the letter soliciting contributions violates 26 U.S.C. § 9003(b)(2) and 11 C.F.R. § 9003.2(a)(2), and, thus, Bush-Quayle 88, through Greek Americans for Bush, has allegedly accepted contributions to

defray qualified general election campaign expenses of the Bush-Quayle candidacy. Such action by the campaign's authorized committee would be in contradiction with its pledge not to accept or utilize private funds in return for public funding of the general election effort. See 26 U.S.C. § 9003(b)(2).

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In their response, counsel for the Committee assert that the activity undertaken by Mr. Chirgotis was not activity authorized by Bush-Quayle 88. While the Committee acknowledges that Mr. Chirgotis was a titular chairman of one of its National Coalitions, it claims Mr. Chirgotis held only a voluntary position with no authority to act on behalf of the campaign. The Committee's response asserts Ceci Cole McInturff, Director of National Voter Coalitions for Bush-Quayle '88, explicitly informed each coalition chairman that no fundraising could be done on behalf of Bush-Quayle 88. An affidavit (Attachment 1, pages 6-8) by McInturff, testifying to this fact accompanied the response. This affidavit asserts that the coalition chairmen were told that if they did fundraising on behalf of local, State or national Republican Party entities, they were to do so on an individual basis and not as agents of Bush-Quayle 88.

The Committee's response also included a Memorandum dated October 12, 1988, to all National and State Coalition Leaders setting out the Bush-Quayle 88 position and reminding coalition leaders of the legal restraints imposed upon them. See Attachment 1, pages 9-10. That memo specifies, "While you as a

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campaign volunteer are free, on an individual basis, to assist Victory '88's fundraising efforts, it should be understood that you are not doing so on behalf of Bush-Quayle." The Committee's response also claims that no money raised by the Chirgotis letter was deposited into the Committee's general election campaign account. Respondent points out that because complainant did not enclose a copy of the return envelope, it is not clear from the complaint to whom the solicited checks were sent or where. Nevertheless, the letter contained the disclaimer "Paid for by Bush Quayle 88" and carried the campaign's address as the address for Greek Americans for Bush.

The complaint was also sent by this Office to Greek Americans For Bush and that committee's chairman, William Chirgotis, at the address listed on the letter. When no response was received from him, a copy of the notification letter and complaint was sent to Mr. Chirgotis at his home in New Jersey. Mr. Chirgotis called this Office and informed office staff that he understood Bush-Quayle had responded on behalf of the Greek Americans For Bush. During the course of that call Mr. Chirgotis also informed this Office that a Mr. Zogby, "from Bush-Quayle," sent Mr. Chirgotis the Bush-Quayle stationery and advised Mr. Chirgotis on how to continue with the project. According to Mr. Chirgotis, approximately \$6,000 was raised from the mailing of the letters involved in this matter. Mr. Chirgotis did not indicate how these funds were spent.

2. MUR 2767

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In this matter, the complainant submitted a copy of a mailing dated October 19, 1988, which it alleges was mailed by Arab-American Republican Federation ("AARF") to 1,000 individuals. A cover letter explicitly states that the mailing is designed so the reader can generate support for George Bush. The mailing includes an open letter from former Congressman Paul Findley endorsing George Bush and criticizing Michael Dukakis. The complainant also submitted a supplement to its complaint on November 15, 1988. The supplement included an enclosure to AARF's mailing which outlined George Bush's position on issues of concern to Arab-Americans and at the bottom reads "Arab-American Supporters for George Bush." The cover letter is signed by two individuals, one of whom is Charles Zogby. The complaint alleges upon information and belief that Zogby is, or has been, an officer or agent of the Bush-Quayle 88 Committee and has the official title of "Coalition Director for Ethnics." The complaint also states that Zogby has been affiliated with the Republican Party since at least 1985. This allegation is based on an article submitted by the complainant, which implies that Mr. Zogby was a participant in the Republican Party's National Republican Heritage Group Council on May 19, 1985.

The complaint alleges that Zogby has been receiving either compensation or reimbursement from the Committee. It is alleged that Zogby's relationship with the Committee and his position with AARF raises the presumption that AARF's expenditure was not

independent, but coordinated with the Committee. The complaint concludes that the Committee has violated 26 U.S.C. § 9003(b) by accepting an in-kind contribution from AARF after the candidates certified to the Commission that they would not accept any contributions in exchange for receiving public funds

AARF responded to this complaint on November 22, 1988 (Attachment 2). Its response consists of an affidavit from Mr. Zogby. In the affidavit he identifies himself as the National Secretary of AARF, and he describes AARF as an unincorporated association whose objectives are to bring Arab-Americans into the Republican Party and provide them with political representation. Zogby asserts that he was a volunteer for the Bush-Quayle campaign, and had no control over campaign decision-making. He claims he was not compensated for any of his activity on behalf of the Bush-Quayle campaign. However, he does state that he received \$150 from the campaign as reimbursement for travel expenses he incurred while traveling on behalf of the Bush-Quayle campaign. He concludes by stating that the materials distributed by AARF made no references to his role as a volunteer for Bush-Quayle, and the mailing was neither authorized by, nor coordinated with the Committee.

Counsel for the Committee submitted a response to this complaint on December 21, 1988 (Attachment 3). This response also asserts that Mr. Zogby was neither an officer nor an agent of the Bush-Quayle campaign, but was an unpaid volunteer with no

authority to act on behalf of the campaign. Counsel claims that Zogby never held the title "Coalition Director for Ethnicns." The response also asserts that Mr. Zogby was familiar with the guidelines issued by the National Voter Coalitions Office for Bush-Quayle 88, which identified the legal restrictions on the activities of the coalitions and its volunteers. An affidavit by Ceci Cole McInturff testifying to these facts accompanied this response.

C. Analysis

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Although the Committee asserts that Greek Americans for Bush did not have the prior consent of Bush-Quayle for these fundraising activities and expenditures on advertisements supporting Bush-Quayle, this activity was performed by one of its groups operating out of campaign headquarters and using campaign stationery. Thus, the Committee is responsible for the Greek Americans For Bush's letter and any contributions received from the solicitation. The issue is also raised, however, whether the separate receipt and disbursement of \$6,000 in contributions would indicate a violation of 2 U.S.C. §§ 433 and 434 by Greek Americans For Bush for failure to register and report as a separate political committee

Based on the foregoing, this Office recommends that the Commission find reason to believe Respondents Bush-Quayle 88 and J. Stanley Huckaby, as treasurer, violated 26 U.S.C. § 9003(b)(2). This Office also recommends that the Commission

find reason to believe Greek Americans For Bush and its treasurer, violated 2 U.S.C. §§ 433 and 434.

The AARF mailing at issue in MUR 2767 did not use Bush-Quayle 88 letterhead or its address, and AARF contends it was done independently of the Bush campaign. Key in assessing the allegations against the Committee in this matter is determining what position, if any, Charles Zogby held in the Bush-Quayle campaign. The Committee asserts that Zogby was an unpaid campaign volunteer, who was familiar with the guidelines issued by National Voter Coalitions for Bush-Quayle 88 which identified the legal restrictions on the activities of the coalitions and its volunteers. In his affidavit Zogby denies ever receiving any compensation from the Bush-Quayle campaign, but he does admit to receiving \$150 from the campaign as reimbursement for campaign travel expenses.

Initially, since Mr. Zogby admits that he received a reimbursement for traveling on behalf of the Committee, a presumption is raised under the explicit language of 11 C.F.R. § 109.1(b)(4)(i)(B) that the mailing was coordinated with the campaign and not an independent expenditure. See also AO 1980-116, 1 Fed. Election Camp. Fin. Guide ¶ 5565 at p. 10,697.

Moreover, there is reason to doubt Mr. Zogby's contention that he could not have been an agent of the campaign under 11 C.F.R. § 109.1(b)(5). That regulation defines as an agent "any person who has been placed in a position within the campaign organization where it would reasonably appear that in the

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ordinary course of campaign-related activities he or she may authorize expenditures." According to Mr. Chirgotis, Mr. Zogby identified himself as from the Bush-Quayle campaign, and supplied Greek Americans for Bush with Bush-Quayle stationery and advice on how to fundraise for the campaign. Because he apparently represented to Chirgotis, a campaign volunteer, that he was acting on behalf of the Bush-Quayle campaign, Zogby may have been an agent of the Committee within the meaning of 11 C.F.R.

§ 109.1(b)(5), which would compromise the independence of such mailing. In addition, the independence of AARF's expenditures may have been undermined because of knowledge Mr. Zogby acquired as an active campaign volunteer. See 11 C.F.R.

§ 109.1(b)(4)(i)(A)

An expenditure that is not independent is considered an in-kind contribution to the candidate on whose behalf it is made. 11 C.F.R. § 109.1(c). The Committee's acceptance of an in-kind contribution would violate President Bush and Vice President Quayle's pledge not to accept any contributions from individuals or committees in exchange for receiving public funding for their campaign. Based on the foregoing this Office recommends that the Commission find reason to believe the Bush-Quayle '88 Committee and J. Stanley Huckaby, as treasurer violated 26 U.S.C.

§ 9003(b)(2)

The complaint erroneously alleges that AARF also violated the Fund Act by making an in-kind contribution to the Committee. The Fund Act does not prohibit individuals or committees from

making contributions to candidates who receive public funds, but rather prohibits the candidates from receiving the contribution. However, Section 441a(a)(1)(A) of the FECA limits contributions to federal candidates to \$1,000, and Section 433 of the FECA requires political committees that receive contributions or make expenditures aggregating in excess of \$1,000 during any calendar year to register and report to the Commission

AARF has not registered with the Commission as a political committee, although it may have expended more than \$1,000 in connection with the mailing involved in this case. Additionally, in view of the organization's partisan political nature, it is possible that its other activities may have triggered an obligation to register and report as a political committee. Compare AO 1988-22. For these reasons, the Office of the General Counsel recommends the Commission find reason to believe that the Arab-American Republican Federation and its treasurer, violated 2 U.S.C. §§ 433, 434 and 441a(a)(1)(A)

D. Merger

There are several common legal and factual issues raised in these two matters involving the Bush-Quayle 88 Committee. Charles Zogby is implicated in both matters. Zogby and William Chirgotis both appear to have operated under the aegis of the National Voter Coalitions for Bush-Quayle 88. Although the transactions are different in each matter, issues of the campaign structure and these individuals' relationship to the campaign overlap. Therefore, this Office recommends that the Commission

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merge MUR 2757 together with MUR 2767.

To facilitate the investigation in this matter, this Office has prepared interrogatories and requests for the production of documents addressed to the named respondents. We have also included subpoenas for the depositions of Mr. Chirgotis, chairman of Greek Americans for Bush, and Mr. Zogby, National Secretary of AARF.

III. RECOMMENDATIONS

1. Find reason to believe that Bush-Quayle 88 and J. Stanley Huckaby, as treasurer, violated 26 U.S.C. § 9003(b)(2)
2. Find reason to believe that Greek Americans for Bush and its treasurer, violated 2 U.S.C. §§ 433 and 434.
3. Find reason to believe that the Arab-American Republican Federation and its treasurer, violated 2 U.S.C. §§ 433, 434 and 441a(a)(1)(A).
4. Merge MUR 2757 with MUR 2767.
5. Approve the attached letters, factual and legal analyses, questions, requests for documents and subpoenas for documents, written answers, and depositions.

Lawrence M. Noble
General Counsel

93043500803
May 11, 1989
Date

BY:

George F. Rishel
George F. Rishel
Acting Associate General Counsel

Attachments

1. Response of the Bush-Quayle 88 Committee in MUR 2757
2. Response of the Arab-American Republican Federation
3. Response of the Bush-Quayle 88 Committee in MUR 2767
4. Proposed letters (4), Factual and Legal Analyses (4), and proposed questions, request for documents and subpoenas for documents, to submit written answers and depositions (2).

Staff Person: Keith V. Morgan

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MURS 2757 and 2767

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5. Approve the letters, factual and legal analyses, questions, requests for documents and subpoenas for documents, written answers, and depositions as recommended in the General Counsel's report dated May 11, 1989.

Commissioners Josefiak, McDonald, McGarry and Thomas voted affirmatively for this decision. Commissioners Aikens and Elliott dissented.

May 24, 1989
Date

Hilda Arnold
Hilda Arnold
Administrative Assistant

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 1, 1989

Jan W. Baran and Carol A. Laham
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RE: MURs 2757 and 2767
Bush-Quayle 88, Inc. and
J. Stanley Huckaby, as
treasurer

Dear Mr. Baran and Ms. Laham:

On November 1 and 7, 1988, the Federal Election Commission notified your clients, Bush-Quayle 88, Inc. and J. Stanley Huckaby, as treasurer, of complaints alleging separate violations of certain sections of Chapter 95 of Title 26, U.S. Code. Copies of the complaints were forwarded to your clients at that time.

Upon further review of the allegations contained in the complaints, and information supplied by you, the Commission, on May 23, 1989, found that there is reason to believe Bush-Quayle 88, Inc. and J. Stanley Huckaby, as treasurer violated 26 U.S.C. § 9003(b)(2), a provision of Chapter 95 of Title 26, U.S. Code, in MURs 2757 and 2767. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information. On May 23, 1989, the Commission also determined to merge these matters together. Both matters will be known as MUR 2767.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your clients. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office along with answers to the enclosed questions within 15 days of receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against your clients

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the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 have any questions, please contact Keith V. Morgan, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lee Ann Elliott
Vice Chairman

Enclosures
Questions
Factual and Legal Analysis

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FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Bush-Quayle 88, Inc.
and J. Stanley Huckaby,
as treasurer

MUR: 2767

A. Introduction

Under the Fund Act, a major party presidential nominee may elect to receive full public financing of his or her general election campaign for president. See generally, 26 U.S.C. §§ 9001-9012. In order to qualify, the candidate must certify that contributions from individuals and political committees will not be accepted. 26 U.S.C. § 9003(b)(2). However, an organization may make independent expenditures on behalf of a presidential candidate receiving funds under the Fund Act. FEC v. National Conservative Political Action Committee ("NCPAC"), 470 U.S. 480, 493 (1985) and 2 U.S.C. § 431(17). In order to qualify as an "independent expenditure," the expenditure must not be made "with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of, a candidate or any agent or authorized committee of such candidate." 11 C.F.R. § 109.1(a). Expenditures that do not qualify under the Commission's regulations as independent are in-kind contributions to the candidate on whose behalf they are made as well as expenditures by the candidate. 11 C.F.R. § 109.1(c).

Commission regulations state that an expenditure is presumed coordinated with a candidate, and hence not independent, if it is, inter alia, "[b]ased on information about the candidate's

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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" or "[m]ade by or through any person who is, or has been . . . receiving any form of compensation or reimbursement from the candidate, the candidate's committee or agent." 11 C.F.R. §§ 109.1(b)(4)(i)(A) and (B). See also AO 1979-80, 1 Fed. Election Camp. Fin. Guide [CCH] ¶5469, at p. 10,527. An "agent" is defined by Commission regulations as any person "who has actual oral or written authority, either express or implied, to make or to authorize the making of expenditures on behalf of a candidate, or means any person who has been placed in a position within the campaign organization where it would reasonably appear that in the ordinary course of campaign-related activities he or she may authorize expenditures." 11 C.F.R. § 109.1(b)(5).

B. MUR 2757

Complainant submitted a copy of a letter written on stationery with the letterhead "Bush-Quayle 88 Coalition of American Nationalities." The letter seeks contributions to "Greek Americans for Bush" so that advertisements supporting the Bush-Quayle candidacy may be placed in "the 13 Greek publications throughout the country." The letter is signed by William G. Chirgotis. At the bottom of the letter there is a disclaimer stating "Paid for by Bush Quayle 88," and the address of the Bush-Quayle 88 headquarters at 733 15th Street, N.W., Suite 800,

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Washington, D.C. 20005 is listed. Complainant notes that Bush-Quayle headquarters and Greek Americans for Bush shared a common address and phone number. Greek Americans for Bush is not an organization registered with the Federal Election Commission as a separate political committee.

It is the complainant's position that the letter soliciting contributions violates 26 U.S.C. § 9003(b)(2) and 11 C.F.R. § 9003.2(a)(2), and thus, Bush-Quayle 88, Inc., through Greek Americans for Bush, has allegedly accepted contributions to defray qualified general election campaign expenses of the Bush-Quayle candidacy. Such action by the campaign's authorized committee would be in contradiction with its pledge not to accept or utilize private funds in return for public funding of the general election effort. See 26 U.S.C. § 9003(b)(2).

In their response, counsel for the Committee assert that the activity undertaken by Mr. Chirgotis was not activity authorized by Bush-Quayle 88, Inc. While the Committee acknowledges that Mr. Chirgotis was a titular chairman of one of its National Coalitions, it claims Mr. Chirgotis held only a voluntary position with no authority to act on behalf of the campaign. In the Committee's response Ceci Cole McInturff, Director of National Voter Coalitions for Bush-Quayle '88 asserts that each coalition chairman was explicitly informed that no fundraising could be done on behalf of Bush-Quayle 88, Inc. An affidavit by McInturff testifying to this fact accompanied the response. This affidavit asserts that the coalition chairmen were told that

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if they did fundraising on behalf of local, state or national Republican Party entities, they were to do so on an individual basis and not as agents of Bush-Quayle 88.

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The Committee's response also included a Memorandum dated October 12, 1988, to all National and State Coalition Leaders setting out the Bush-Quayle 88, Inc. position and reminding coalition leaders of the legal restraints imposed upon them. That memo specifies, "While you as a campaign volunteer are free, on an individual basis, to assist Victory '88's fundraising efforts, it should be understood that you are not doing so on behalf of Bush-Quayle." The Committee's response also claims that no money raised by the Chirgotis letter was deposited into the Committee's general election campaign account. Respondent points out that because complainant did not enclose a copy of the return envelope, it is not clear from the complaint to whom the solicited checks were sent or where. Nevertheless, the letter contained the disclaimer "Paid for by Bush Quayle 88" and carried the campaign's address as the address for Greek Americans for Bush. It appears that approximately \$6,000 may have been raised from the mailing of the letters involved in this matter, but it is not known how these funds were spent.

Although the Committee asserts that Greek Americans for Bush did not have the prior consent of Bush-Quayle for these fundraising activities and expenditures on advertisements supporting Bush-Quayle, this activity was performed by one of its

groups operating out of campaign headquarters and using campaign stationery. Thus, the Committee is responsible for the Greek Americans For Bush's letter and any contributions received from the solicitation. Therefore, there is reason to believe Bush-Quayle 88, Inc. and J. Stanley Huckaby, as treasurer, violated 26 U.S.C. § 9003(b)(2).

C. MUR 2767

In this matter, the complainant submitted a copy of a mailing dated October 19, 1988, which it alleges was mailed by the Arab-American Republican Federation ("AARF") to 1,000 individuals. A cover letter explicitly states that the mailing is designed so the reader can generate support for George Bush. The mailing includes an open letter from former Congressman Paul Findley endorsing George Bush and criticizing Michael Dukakis. The complainant also submitted a supplement to its complaint on November 15, 1988. The supplement included an enclosure to AARF's mailing which outlined George Bush's position on issues of concern to Arab-Americans and at the bottom reads "Arab-American Supporters for George Bush." The cover letter is signed by two individuals, one of whom is Charles Zogby. The complaint alleges upon information and belief that Zogby is, or has been, an officer or agent of Bush-Quayle 88, Inc. and has the official title of "Coalition Director for Ethnics." The complaint also states that Zogby has been affiliated with the Republican Party since at least 1985. This allegation is based on an article submitted by the complainant, which implies that Mr. Zogby was a

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participant in the Republican Party's National Republican Heritage Group Council on May 19, 1985.

The complaint alleges that Zogby has been receiving either compensation or reimbursement from the Committee. It is alleged that Zogby's relationship with the Committee and his position with AARF raises the presumption that AARF's expenditure was not independent, but coordinated with the Committee. The complaint concludes that the Committee has violated 26 U.S.C. § 9003(b) by accepting an in-kind contribution from AARF after the candidates certified to the Commission that they would not accept any contributions in exchange for receiving public funds. It appears that Mr. Zogby received at least \$150 from the campaign as reimbursement for travel expenses he incurred while traveling on behalf of the Bush-Quayle campaign.

Counsel for the Committee submitted a response to this complaint on December 21, 1988. This response asserts that Mr. Zogby was neither an officer nor an agent of the Bush-Quayle campaign, but was an unpaid volunteer with no authority to act on behalf of the campaign. Counsel claims that Zogby never held the title "Coalition Director for Ethnics." The response asserts that Mr. Zogby was familiar with the guidelines issued by the National Voter Coalitions Office for Bush-Quayle 88, which identified the legal restrictions on the activities of the coalitions and its volunteers. An affidavit by Ceci Cole McInturff testifying to these facts accompanied this response.

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The AARF mailing at issue in MUR 2767 did not use Bush-Quayle 88 letterhead or its address, and the question is raised whether it was done independently of the Bush campaign. Key in assessing the allegations against the Committee in this matter is determining what position, if any, Charles Zogby held in the Bush-Quayle campaign. Zogby denies ever receiving any compensation from the Bush-Quayle campaign, but he does admit to receiving \$150 from the campaign as reimbursement for campaign travel expenses. Initially, since Mr. Zogby admits that he received a reimbursement for traveling on behalf of the Committee, a presumption is raised under the explicit language of 11 C.F.R. § 109.1(b)(4)(i)(B) that the mailing was coordinated with the campaign and not an independent expenditure. See also AO 1980-116, 1 Fed. Election Camp. Fin. Guide. ¶ 5565, at p. 10,697.

Moreover, there is reason to doubt the Committee's contention that Mr. Zogby could not have been an agent of the campaign under 11 C.F.R. § 109.1(b)(5). That regulation defines as an agent "any person who has been placed in a position within the campaign organization where it would reasonably appear that in the ordinary course of campaign-related activities he or she may authorize expenditures." It appears that Mr. Zogby identified himself as from the Bush-Quayle campaign, and supplied Greek Americans for Bush with Bush-Quayle stationery and advice on how to fundraise for the campaign. Because he apparently

represented to another volunteer that he was acting on behalf of the Bush-Quayle campaign, Zogby may have been an agent of the Committee within the meaning of 11 C.F.R. § 109.1(b)(5), which would compromise the independence of such mailing under 11 C.F.R. § 109.1(b)(4)(i)(A). In addition, the independence of AARP's expenditures may have been undermined because of knowledge Mr. Zogby acquired as an active campaign volunteer.

An expenditure that is not independent is considered an in-kind contribution to the candidate on whose behalf it is made. 11 C.F.R. § 109.1(c). The Committee's acceptance of an in-kind contribution would violate President Bush and Vice President Quayle's pledge not to accept any contributions from individuals or committees in exchange for receiving public funding for their campaign. Therefore, there is reason to believe Bush-Quayle 88, Inc. and J. Stanley Huckaby, as treasurer, violated 26 U.S.C. § 9003(b)(2).

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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MUR 2767

**INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS**

TO: J. Stanley Huckaby, Treasurer
Bush-Quayle 88, Inc.
c/o Jan Baran and Carol Laham
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

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In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

INSTRUCTIONS

In answering these interrogatories and requests for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery requests shall refer to the time period from January 1, 1987 to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

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DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, advertisements, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document and the source or author of the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

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BEFORE THE FEDERAL ELECTION COMMISSION

QUESTIONS AND DOCUMENT REQUESTS

MUR 2767

1. In regard to the fundraising letter sent out on Bush-Quayle 88 Coalition of American Nationalities letterhead and signed by William G. Chirgotis, Chairman of Greek Americans for Bush:

- a. identify the account from which funds came to finance the production and mailing of the letters, by financial institution, number, and account holder;
- b. state when the letters were sent and provide the costs for their preparation and distribution;
- c. state how much was received in contributions as a result of the solicitation;
- d. identify all persons who were involved in this fundraising activity;
- e. identify the account by financial institution, number, and account holder into which funds received from this solicitation were deposited;
- f. state how the funds derived from this letter were used.

2. Identify all advertisements placed in Greek American publications on behalf of Bush-Quayle 88, Inc. and identify the persons who paid for each such advertisement.

3. Describe the relationship of Greek Americans For Bush with Bush-Quayle 88, Inc. Identify all documents which refer or in any way relate to such relationship.

4. Describe the relationship of Mr. Charles Zogby with Greek Americans For Bush, and his role in the production and mailing of the fundraising letter sent out on Bush-Quayle 88 Coalition of American Nationalities letterhead and signed by William G. Chirgotis.

5. a. In your December 21, 1988 response to MUR 2767, you state that Charles Zogby was an unpaid volunteer with National Voter Coalitions for Bush-Quayle. Please describe each and every activity Mr. Zogby engaged in

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as a volunteer and list, by date, amount, and purpose, every advance, reimbursement, and other payment you made to Mr. Zogby

- b. Please identify all documents referring or in any way relating to communications between Mr. Zogby and Bush-Quayle 88, Inc., and all documents referring or in any way relating to Mr. Zogby's relationship with and/or activities on behalf of Bush-Quayle 88, Inc. Summarize all oral communications between Bush-Quayle 88, Inc. and Mr. Zogby.
 - c. Please provide the dates, the names of those in attendance and the subject matter discussed for each and every meeting Mr. Zogby attended with staff members, officials, consultants or other agents of Bush-Quayle 88, Inc.
6. With respect to the document attached hereto as Exhibit 1:
 - a. Identify Arab American Supporters for George Bush and describe its relationship with Bush-Quayle 88, Inc. and the Bush-Quayle Coalition of American Nationalities.
 - b. Identify the persons who prepared or reviewed the document and state whether you assisted in any way in the distribution of the document.
7. Describe your relationship with the Arab-American Republican Federation ("AARF").
8. In addition to those documents identified, produce copies of all documents that relate to your relationship with AARF or Greek Americans for Bush and any of their officers, directors or members.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 1, 1989

Charles Zogby, National Secretary
Arab-American Republican Federation
918 16th Street, N.W.
Washington, D.C. 20006

RE: MUR 2767
Arab-American Republican
Federation

Dear Mr. Zogby:

On November 7, 1988, the Federal Election Commission notified the Arab-American Republican Federation ("AARF") of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to AARF at that time.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on May 23, 1989, found that there is reason to believe AARF and its treasurer, violated 2 U.S.C. §§ 433, 434 and 441a(a)(1)(A), provisions of the Act. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against AARF. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Statements should be submitted under oath. All responses to the enclosed Subpoena to Produce Documents and Order to Submit Written Answers must be submitted to the General Counsel's Office within 15 days of your receipt of this letter. Any additional materials or statements you wish to submit should accompany the response to the subpoena and order. Additionally, the Commission subpoenas you to appear for deposition with regard to this matter on the date, place and time noted on the enclosed subpoena.

In the absence of any additional information demonstrating that no further action should be taken against AARF, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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Charles Zogby
Page 2

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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.

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 have any questions, please contact Keith V. Morgan, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lee Ann Elliott
Vice Chairman

Enclosures

Subpoena and Order
Factual and Legal Analysis
Designation of Counsel Form

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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MUR 2767

SUBPOENA AND ORDER

TO: Charles Zogby
National Secretary
Arab-American Republican Federation
918 16th Street, N.W., Suite 501
Washington, D.C. 20006

Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and Subpoenas you to produce the documents requested on the attachment to this Subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

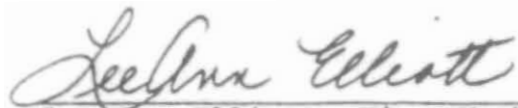
Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 15 days of your receipt of this Order and Subpoena.

Additionally, pursuant to 2 U.S.C. § 437d(a)(3), the Federal Election Commission hereby subpoenas you to appear for deposition with regard to this matter on June 30, 1989, at the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463 beginning at 10:00 A.M. and continuing each day thereafter as necessary.

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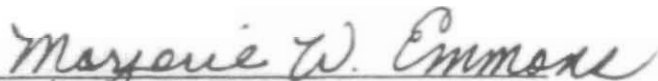
Charles Zogby
Page 2

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C., this 31st day of
May, 1989.



Lee Ann Elliott, Vice Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Document Requests
Questions

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INSTRUCTIONS

In answering these interrogatories and requests for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery requests shall refer to the time period from January 1, 1987 to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

93043500825

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, advertisements, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document and the source or author of the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

93043500826

BEFORE THE FEDERAL ELECTION COMMISSION

QUESTIONS AND DOCUMENT REQUESTS

MUR 2767

1. In regard to the Arab-American Republican Federation's ("AARF") October 19, 1988 mailing providing recipients with information designed to encourage their support of George Bush for president:

- a. Please produce a complete copy of the mailing and all of its enclosures.
- b. State where each enclosure, including but not limited to the enclosure titled "Vice President George Bush and Issues of Concern to Arab Americans," was obtained, from whom it was obtained or how and by whom it was prepared.
- c. Please state the total amount of expenditures made by AARF with regard to the production and distribution of the mailing.
- d. State how many persons were sent the mailing. Explain how the names of these recipients were obtained. If from a mailing list, state the source of the list.
- e. Describe Charles Zogby's role in preparing and distributing the mailing.
- f. Identify all persons involved in the creation, preparation and distribution of the mailing.

2. Please identify all officers, directors, employees, staff members, consultants or other agents of AARF. Include an organization chart of AARF's management structure for each year of its existence since 1987.

3. Identify the person or persons who preserve the financial records for AARF.

4. State whether during the 1988 calendar year AARF was involved in any of the activities listed below. If so, state the amount, date, candidate, payer, purpose and circumstances of the disbursement or expenditure:

- a. Expenditures on behalf of a federal candidate.
- b. Payments for the costs of preparing, displaying, distributing or mailing a printed slate card, sample ballot, or other printed listing which included any federal candidate.

93043500827

- 93043500828
- c. Payments for the costs of campaign materials, such as pins, bumper stickers, handbills, brochures, posters, party tabloids, and yard signs, on behalf of any federal candidate or political party.
 - d. Payments for the costs of voter registration or get-out-the-vote activities on behalf of any federal candidate or political party during the 1988 calendar year.
5. State whether AARF or any of its agents have solicited contributions by telephone or direct mail in support of the election or defeat of any candidate for federal office. If the answer is yes, state the number of persons solicited, the cost of the solicitations, and the names of the candidates involved.
6. a. State the total of all receipts including but not limited to contributions, donations, loans, dues, royalties or subscription fees obtained during 1988 by AARF.
- b. For each contribution received in excess of \$5,000 during a calendar year from a person, identify the person, together with the date and amount of the contribution.
- c. State whether AARF has ever received any financial support from any corporation or labor union. If so, identify each corporation or labor union from which funds have been received since the establishment of AARF, together with the date and amount of each corporate or labor union receipt.
7. Describe AARF's relationship to Bush-Quayle 88 or any of its agents and identify all documents which refer or in anyway relate to such relationship.
8. Describe the relationship, if any, between AARF and the Republican Heritage Group Council and any county, state, or national committee or organization of the Republican Party.
9. In addition to the documents identified above, produce copies of all materials discussed in response to question 4 and all other relevant documents regarding your responses to the above questions.

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Arab-American Republican Federation and its treasurer MUR 2767

A. The Law

A political committee under the Act is any committee or group of persons that receives contributions or makes expenditures in connection with federal elections aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(A). In accordance with section 433(a), each political committee must file a Statement of Organization. Section 434(a) also requires political committees to file periodic reports of receipts and disbursements. In addition, no person may contribute in excess of \$1,000 per election to any candidate for federal office. 2 U.S.C. § 441a(a)(1)(A).

B. The Complaint and the Response

The complainant submitted a copy of a mailing dated October 19, 1988, which it alleges was mailed by Arab-American Republican Federation ("AARF") to 1,000 individuals. A cover letter signed by Charles Zogby and Mike Sarafa explicitly states that the mailing is designed so the reader can generate support for George Bush. The mailing includes an open letter from former Congressman Paul Findley endorsing George Bush and criticizing Michael Dukakis. The complainant also submitted a supplement to its complaint on November 15, 1988. The supplement included an enclosure to AARF's mailing which outlined George Bush's position

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on issues of concern to Arab-Americans and at the bottom reads "Arab-American Supporters for George Bush."

AARF responded to this complaint on November 22, 1988. Its response consists of an affidavit from Mr. Zogby. In the affidavit he identifies himself as the National Secretary of AARF, and he describes AARF as an unincorporated association whose objectives are to bring Arab-Americans into the Republican Party and provide them with political representation. Mr. Zogby asserts that he was a volunteer for the Bush-Quayle campaign and that he received \$150 from the campaign as reimbursement for travel expenses he incurred while traveling on behalf of the Bush-Quayle campaign, but that the mailing was sent out by AARF independently of the Bush-Quayle campaign.

C. Analysis

AARF has not registered with the Commission as a political committee, although it may have expended more than \$1,000 in connection with the mailing involved in this case. Additionally, in view of the organization's partisan political nature, it is possible that its other activities may have triggered an obligation to register and report as a political committee. Compare AO 1988-22. Furthermore, in view of Mr. Zogby's relationship with the Bush-Quayle campaign, including at least one travel reimbursement received, see 11 C.F.R. § 109.1(4)(i)(B); AO 1980-116, AARF's mailing may not have been an independent expenditure by AARF under the Act. See 2 U.S.C. § 431(17). If not, the expenses associated with the mailing may

have exceeded the \$1,000 limitation on in-kind contributions at 2 U.S.C. § 441a(a)(1)(A). See 2 U.S.C. § 441a(a)(7)(B)(i). Therefore, there is reason to believe that the Arab-American Republican Federation and its treasurer, violated 2 U.S.C. §§ 433(a), 434 and 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 1, 1989

William G. Chirgotis, Chairman
Greek Americans for Bush
37 Mountain Avenue
Springfield, N.J. 07081

RE: MUR 2767
Greek Americans for Bush

Dear Mr. Chirgotis:

On November 1, 1988, the Federal Election Commission notified Greek Americans for Bush of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on May 23, 1989, found that there is reason to believe Greek Americans for Bush and its treasurer, violated 2 U.S.C. §§ 433 and 434, provisions of the Act. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information. On May 23, 1989, the Commission also determined to merge MUR 2757 with MUR 2767. Both matters will be known as MUR 2767.

Under the Act, you have an opportunity to demonstrate that no action should be taken against Greek Americans for Bush. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Statements should be submitted under oath. All responses to the enclosed Subpoena to Produce Documents and Order to Submit Written Answers must be submitted to the General Counsel's Office within 15 days of your receipt of this letter. Any additional materials or statements you wish to submit should accompany the response to the subpoena and order. Additionally, the Commission hereby subpoenas you to appear for deposition with regard to this matter on the date, place and time noted on the enclosed subpoena.

In the absence of any additional information demonstrating that no further action should be taken against Greek Americans for Bush the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

93043500832

William G. Chirgotis
Page 2

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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.

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 have any questions, please contact Keith V. Morgan, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lee Ann Elliott
Vice Chairman

Enclosures
Subpoena and Order
Factual and Legal Analysis
Designation of Counsel Form

93043500833

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)

)

MUR 2767

SUBPOENA AND ORDER

TO: William Chirgotis, Chairman
Greek Americans for Bush
37 Mountain Avenue
Springfield, NJ 07081

Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and directs you to produce the documents requested on the attachment to this Subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 15 days of your receipt of this Order and Subpoena.

Additionally, pursuant to 2 U.S.C. § 437d(a)(3), the Federal Election Commission hereby subpoenas you to appear for deposition with regard to this matter on June 28, 1989, at the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463 beginning at 10:00 A.M. and continuing each day thereafter as necessary.

William Chirgotis
Page 2

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C., this *31st* day of
May, 1989.

Lee Ann Elliott
Lee Ann Elliott, Vice Chairman
Federal Election Commission

ATTEST:

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

Attachments
Document Requests
Questions

93043500835

INSTRUCTIONS

In answering these interrogatories and requests for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery requests shall refer to the time period from January 1, 1987 to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

93043500836

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, advertisements, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document and the source or author of the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

93043500837

BEFORE THE FEDERAL ELECTION COMMISSION

QUESTIONS AND DOCUMENT REQUESTS

MUR 2767

1. In regard to the fundraising letter sent out on Bush-Quayle 88 Coalition of American Nationalities letterhead and signed by William G. Chirgotis, Chairman of Greek Americans for Bush:

- a. state when the letters were sent and provide the costs for their preparation and distribution;
- b. state how much was received in contributions as a result of the letters' distribution;
- c. identify all persons who were involved in the creation, development and implementation of this fundraising activity;
- d. identify the account by financial institution, number, and account holder into which funds received from this solicitation were deposited;
- e. state how the funds derived from this letter were used.

2. Identify all advertisements placed in Greek American publications on behalf of Bush-Quayle 88, Inc. and identify the persons who paid for such.

3. On January 6, 1989, Mr. Chirgotis stated in a telephone conversation with an Office of the General Counsel staff person that he received Bush-Quayle 88, Inc. letterhead and fundraising advice from a Mr. Zogby. In regard to Mr. Zogby please:

- a. describe his position with Bush-Quayle 88, Inc.;
- b. describe the specific fundraising advice he provided Mr. Chirgotis;
- c. summarize all communications between Mr. Chirgotis and Mr. Zogby.

4. Identify the person or persons who preserve the financial records for Greek Americans for Bush.

5. Produce all documents relating to the creation, development and implementation of this fundraising activity including, but not limited to cancelled checks, memoranda and correspondence.

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FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Greek Americans for Bush MUR 2767
and its treasurer

A. The Law

A political committee under the Act is any committee or group of persons that receives contributions or makes expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(A). In accordance with section 433(a), each political committee must file a Statement of Organization. Section 434(a) also requires political committees to file periodic reports of receipts and disbursements.

B. The Complaint and the Response

Complainant submitted a copy of a letter written on stationery with the letterhead "Bush-Quayle 88 Coalition of American Nationalities." The letter seeks contributions to "Greek Americans for Bush" so that advertisements supporting the Bush-Quayle candidacy may be placed in "the 13 Greek publications throughout the country." The letter is signed by William G. Chirgotis. At the bottom of the letter there is a disclaimer stating "Paid for by Bush Quayle 88," and the address of the Bush-Quayle 88 headquarters at 733 15th Street, N.W., Suite 800, Washington, D.C. 20005 is listed. Greek Americans for Bush is not an organization registered with the Federal Election Commission as a separate political committee. It appears that approximately \$6,000 may have been raised from the mailing of the letters involved in this matter, but it is not known how these funds were spent.

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C. **Analysis**

The separate receipt and disbursement of \$6,000 in contributions could indicate a violation of 2 U.S.C. §§ 433 and 434 by Greek Americans For Bush for failure to register and report as a separate political committee. Therefore, there is reason to believe Greek Americans For Bush and its treasurer, violated 2 U.S.C. §§ 433 and 434.

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06C 3025

J. N. PARKER

1100 CONNECTICUT AVENUE, N.W. WASHINGTON, D.C. 20036-4101

June 9, 1989

Keith V. Morgan, Esquire
Federal Election Commission
Room 657
Washington, D.C. 20463

Re: MUR 2767
Greek Americans for Bush

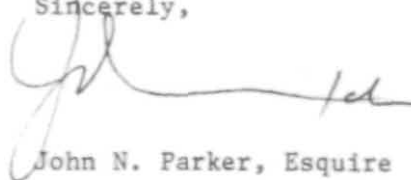
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
89 JUN 13 AM 9:18

Dear Mr. Morgan:

Confirming our telephone conversation, I attach designation of counsel form executed by William C. Chirgotis. I will require a postponement of response and the taking of depositions until July 20, 1989.

Kindly forward copy of complaint of November 1, 1988.

Sincerely,



John N. Parker, Esquire

Enclosure

93043500841

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2767

NAME OF COUNSEL: John N. Parker, Esquire

ADDRESS: 1100 Connecticut Avenue, Suite 620
Washington, D.C. 20036

TELEPHONE: 202-862-1318

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

June 8, 1989
Date

William G. Chirgotis
Signature

RESPONDENT'S NAME: William G. Chirgotis

ADDRESS: 37 Mountain Avenue
Springfield, New Jersey 07081

HOME PHONE: 201-273-1222

BUSINESS PHONE: 201-376-3200

93043500842

06 C 3033
RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION
89 JUN 13 AM 9:52

LAW OFFICE OF
RICHARD MAYBERRY & ASSOCIATES
FIFTH FLOOR
888 16TH STREET, N.W.
WASHINGTON, D.C. 20006
(202) 785-6677

June 9, 1989

Keith Morgan, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, NW
Sixth Floor
Washington, D.C. 20463

Re: MUR 2767

Dear Mr. Morgan:

I have been retained to represent the Arab-American Republican Federation and Charles Zogby. You will find enclosed our Designation of Counsel.

By my computation, the response to the interrogatories are due on June 19, 1989. I have long-standing plans to be on vacation the entire week of June 12, 1989 and will return to work on June 19, 1989. This does not permit an opportunity to adequately consult with my clients about this matter. Accordingly, I request an extension of time until June 28, 1989, to respond to the interrogatories. I have no reason to believe that an additional request for enlargement of time to answer the interrogatories will be required.

Thank you in advance for your consideration of this request.

Very truly yours,

Richard Mayberry
Richard Mayberry

HRM:rjy

Enclosure

93043500843
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 JUN 13 AM 11:17

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2767

NAME OF COUNSEL: Richard Mayberry

ADDRESS: 888 16th Street, NW

Fifth Floor

Washington, D.C. 20006

TELEPHONE: (202) 785-6677

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

6/9/89
Date

[Signature]
Signature

RESPONDENT'S NAME: Charles Zogby and

ADDRESS: Arab-American Republican Federation

918 16th Street, NW; Suite 501

Washington, D.C. 20006

HOME PHONE: _____

BUSINESS PHONE: _____

93043500844

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

JAN W. BARAN
(202) 429-7330

June 13, 1989

TELECOPIER
(202) 429-7049
TELEX 248349 WYRN UR

66C3049
RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION

89 JUN 14 AM 8:42

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2767

Attn: Keith V. Morgan

I am in receipt of Vice Chairman Elliott's letter informing me that the Federal Election Commission has found reason to believe Bush-Quayle 88, Inc. and J. Stanley Huckaby, as Treasurer, violated 26 U.S.C. § 9003(b)(2) in MURS 2757 and 2767, now MUR 2767. Vice Chairman Elliott's letter was accompanied by Interrogatories and Request for Production of Documents.

A response to these interrogatories is currently due on June 20, 1989. In order to fully confer with Respondent and to obtain whatever information and documentation which may prove necessary, I respectfully request a twenty-day extension of time to and including July 10, 1989, within which to respond.

Your favorable consideration of this request will be appreciated.

Sincerely,

Jan Baran /CHL
Jan W. Baran

rpb

cc: Mr. J. Stanley Huckaby

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

89 JUN 14 AM 10:13

93043500845



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 16, 1989

J. N. Parker, Esquire
1100 Connecticut Avenue, N.W.
Washington, D.C. 20036-4101

RE: MUR 2767
Greek Americans for Bush

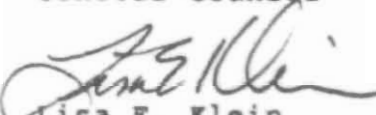
Dear Mr. Parker:

This is in response to your letter dated June 9, 1989, which we received on June 13, 1989, requesting an extension until July 20, 1989 to respond to the reason to believe finding against your client, and to answer the interrogatories and document requests in this matter. After considering the circumstances you presented to Keith Morgan during a June 9, 1989 telephone conversation, I have granted the requested extension. Accordingly, your response is due by the close of business on July 20, 1989. This extension will necessitate that the deposition of Mr. Chirgotis, presently noticed for June 28, 1989, be postponed until August 2, 1989 at 10:00 a.m.

Please confirm your availability for August 2, 1989, with Keith V. Morgan, the attorney assigned to this matter, at (202) 376-8200 at your earliest convenience.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lisa E. Klein
Assistant General Counsel

93043500846



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 16, 1989

Jan W. Baran, Esquire
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 2767
Bush-Quayle 88 and
J. Stanley Huckaby,
as treasurer

Dear Mr. Baran:

This is in response to your letter dated June 13, 1989, which we received on June 14, 1989, requesting an extension until July 10, 1989 to respond to the reason to believe finding against your clients, and to answer the interrogatories and document requests in this matter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on July 10, 1989.

If you have any questions, please contact with Keith V. Morgan, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lisa E. Klein
Assistant General Counsel

93043500847



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 16, 1989

Richard Mayberry, Esquire
Richard Mayberry & Associates
Fifth Floor
888 16th Street, N.W.
Washington, D.C. 20006

RE: MUR 2767
Arab-American Republican
Federation

Dear Mr. Mayberry:

This is in response to your letter dated June 9, 1989, which we received on June 13, 1989, requesting an extension until June 28, 1989 to respond to the reason to believe finding against your client, and to answer the interrogatories and document requests in this matter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on June 28, 1989. This extension will necessitate that the deposition of Mr. Zogby, presently noticed for June 30, 1989, be postponed until August 4, 1989 at 10:00 a.m.

Please confirm your availability for August 4, 1989, with Keith V. Morgan, the attorney assigned to this matter, at (202) 376-8200 at your earliest convenience.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in cursive script, appearing to read "Lisa E. Klein", is written over the typed name of the Assistant General Counsel.

BY: Lisa E. Klein
Assistant General Counsel

93043500848

06C 3241

LAW OFFICE OF
RICHARD MAYBERRY & ASSOCIATES
FIFTH FLOOR
888 16TH STREET, N.W.
WASHINGTON, D.C. 20006
(202) 785-6677

June 28, 1989

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 JUN 28 PM 4:03

BY HAND

Keith V. Morgan, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, NW
Sixth Floor
Washington, D.C. 20463

Re: MUR 2767

Dear Mr. Morgan:

You will find enclosed the Respondent's answers to the Commission's interrogatories and request for production of documents.

If you have any questions, please contact me.

Very truly yours,

Richard Mayberry

Richard Mayberry

RM:rjy

Enclosure

93043500849

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 JUN 28 PM 4:11

9 3 0 4 3 5 0 0 8 5 0
In The Matter Of The
Complaint Of:

Dukakis/Bentsen Committee, Inc.,

Complainant,

v.

Arab-American Republican Federation,

Respondent.

MUR No. 2767

RESPONSE TO FEDERAL ELECTION COMMISSION'S INTERROGATORIES

Charles Zogby, National Secretary of the Arab-American Republican Federation ("Federation" or "AARF") responds to the Federal Election Commission's Interrogatories as follows:

Question 1.

- (a) Attached.
- (b) The cover letter to "Dear Arab American Republican" on Arab American Republican Federation stationery was written by Mike Sarafa, co-signer of the letter.

The first enclosure, entitled "Vice President George Bush on Issues of Concern to Arab Americans" was compiled from information publicly available from newspapers, articles, Bush issue statements, speeches, and other publicly available sources on the Vice President's policy positions. This enclosure was prepared by Mike Sarafa.

The second enclosure, entitled "An Open Letter to the Arab American Community from Congressman Paul Findley" was written in response to questions posed by Arab American Republicans asking for the Congressman's opinion on the candidate's Middle East policy.

The third enclosure, entitled "Bush-Quayle '88 Campaign Announces Arab American Committee" was publicly released by Bush-Quayle '88 on October 20, 1988 and was sent to a list of Arab American information and news sources that included the Arab American Republican Federation.

The fourth enclosure, the Arab American Republican Federation membership card was originally prepared by Charles Zogby for a January 1988 mailing to Arab American Republicans to solicit old and new members to join the Federation as well as survey issues of concern to these members.

- (c) \$537.52.

- 9 3 0 4 3 5 0 0 8 5 2
- (d) Eight-hundred and eighty-eight (888) persons were sent the mailing in question. The recipients were identified Arab American Republicans or Arab Americans who indicated support for Republicans. The mailing list is one that had been compiled by the Federation since its existence.
 - (e) Charles Zogby did not play a role in the preparation or distribution of the mailing.
 - (f) Mike Sarafa was principally involved in creating and preparing the mailing.

Question 2.

The officers for 1986 through the present are:

Nader Sayegh -- Chairman
Nizar Jwaideh* -- Vice Chair
Ray Baroud -- Correspondence Secretary
Charles Zogby -- Secretary
Mounzer Chaarani -- Treasurer

The Federation has no employees but depends on the volunteer services of its board and club representatives. The Federation is administered by a staff liaison from the Arab-American Institute (AAI). The Federation pays AAI for its share of staff support and office space.

Question 3.

Charles Zogby is custodian of the Federation records.

* Deceased.

Question 4.

(a)

- i. \$1,988.26 was spent by AARF between December 1987 and January 1988 for a mailing to 4,783 Arab American Republicans in support of George Bush for President (reimbursed by Bush/Quayle campaign).
- ii. \$537.52 was spent by AARF in October 1988 in a mailing to Federation members to recruit members and encourage support for the Bush/Quayle ticket in November.
- iii. \$1,293.75 was spent by AARF in August 1988 to purchase "Ethnic Voters for Bush" campaign buttons for the Republican National Convention.

(b) None.

(c) See 4 (a) iii.

(d) See 4 (a) ii and response to Question 1.

Question 5.

See 4(a)(i).

Question 6.

- (a) \$7,665.00.
- (b) None.
- (c) Upon information and belief, No.

Question 7.

AARF had no formal relationship with the Bush-Quayle '88 campaign.

Question 8.

The AARF is a member of the National Republican Heritage Groups Council, an auxiliary of the Republican National Committee. The AARF has no formal relationship with any other organization of the Republican Party though individual members of the AARF may participate in the Republican Party at the state and local level.

Respectfully submitted,

Date: 6/28/89


Charles Zoghy

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ELECTION COMMISSION

9 3 0 4 3 5 0 0 8 5 5
In The Matter Of The
Complaint Of:

Dukakis/Bentsen Committee, Inc.

Complainant,

v.

Arab-American Republican Federation,

Respondent.

MUR No. 2767

RESPONSE TO FEDERAL ELECTION COMMISSION'S
REQUEST FOR PRODUCTION OF DOCUMENTS

Charles Zogby, National Secretary of the Arab-American Republican Federation,
responds to the Federal Election Commission Request for Production of Documents as
follows:

Arab American
Republican
Federation



4/21/88
108

Election '88 Report #6
April 1988

* * * *

March's Super Tuesday and Illinois primaries, handing Vice President George Bush the Republican nomination, effectively ended active campaigning in the presidential race. Yet the election process continues across the country, with delegates being selected at the precinct caucuses and state primaries that still remain on the calendar. Arab American activity in the 1988 elections pushes forward, particularly at the presidential level, where active planning for the general election has already begun.

[1] Results continue to come in from across the state of Texas where Arab American Republicans have registered impressive gains in the state's caucus system.

* **Houston - Arab Americans garnered 8 precinct delegate slots** in the March 8th caucuses across the Houston area. Many moved on to the March 19th senatorial level conventions and forward still to the to state convention, scheduled to take place in Houston on June 9th-11th.

Louis Macey is headed onto the Texas Republican state convention in June as a Bush delegate. Mr. Macey, elected in the 17th senatorial district, precinct 234, has a long record of involvement in Houston politics. A former city council member and presently serving on the Metro Board, the local public transit authority, Mr. Macey notes that his experience with George Bush dates back to 1970 when he worked on Bush's unsuccessful bid for the U.S. Senate.

Samir Jazrawi, also a Bush delegate, has been selected as a alternate to the state convention from senatorial district 7, precinct 504. Mr. Jazrawi was successful in passing a resolution calling for peace in the Middle East.

Victor Maria will also be attending the state Republican convention as an alternate delegate. Both Mr. Maria and his wife, **Norma Maria**, were elected as Bush delegates from precinct 25. Mr. Maria did attempt to introduce a resolution on Palestinian statehood but noted that it was met with strong opposition and some rather contentious behavior on the part of the precinct leadership and other delegates.

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Jomana Amara went to both the precinct and senatorial conventions as a Bush delegate. Ms. Amara, elected in senatorial district 17, precinct 4, was also appointed to the resolutions committee, but was unsuccessful in her attempt to introduce resolutions on Palestinian statehood and Lebanon.

Janet Mousa was elected as a Bush delegate from senatorial district 7, precinct 14 and attended both the precinct and senatorial conventions. Though she did not make it to the state convention, Ms. Mousa nonetheless hopes to attend the June state convention as a volunteer.

Assad Shorrosh was also elected as a Bush delegate from senatorial district 7, precinct 648 and attended the March 8th precinct convention.

Zahra Khatib rounds out the field of Arab American Bush delegates. Elected in precinct 350, senatorial district 13, Ms. Khatib attended both the March 8th and 19th conventions.

Though not running as a Bush delegate, **Samir Poteh** joined with other Arab American businessmen in running advertisements in support of George Bush. The ads, run just before the March 8th primary, were promoted jointly with the Fort Bend County Republican Women's Club.

* **Dallas-Ft. Worth** - **Bill Gunselman** was appointed to nominations committee for the 26th congressional district. The committee was charged with selecting delegates to go on to the Republican National Convention in New Orleans. Though not among those selected by the committee, Mr. Gunselman reports that an opportunity to go forward still exists in the at-large delegate process, where he hopes to make it as a national delegate.

George Aldridge and **Issa Kamar**, both of whom were elected as delegates at the March 8th caucuses in Dallas, made it on to the March 19th senatorial level conventions. Each senatorial convention sent forward 3 delegates to attend the state convention in June. Mr. Aldridge and Mr. Kamar were not selected to go on to the state convention. **Joe Chamy**, who was also selected to go to the senatorial convention, was unable to attend due to an illness in the family.

[2] In Colorado, **Sherine Hamawy Centanari** was elected as a Bush delegate at the April 4th precinct caucuses, from 535th precinct in Denver County. Ms. Centanari goes onto the April 23rd county conventions and hopes to make it to the state convention.

[3] **Emil Haddad** helped give the Bush campaign a boost in Illinois, where Bush handily won the March 15th primary. Mr. Haddad, a committeeman in precinct 29, York Township, worked in getting out the vote on election day and was able to deliver his

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precinct for Bush. Mr. Haddad also had the opportunity to meet the Vice President as he was campaigning through the state.

[4] **George Salem**, representing the Arab American Institute, appeared before the Republican National Committee's **Committee on the Platform** on March 30th, urging the Party to include in its platform a plank calling for Middle East peace based on the formula of Palestinian self-determination, with rights to statehood

Speaking before the Committee, which included Republican National Committee **Chairman Frank J. Fahrenkopf, Jr.**, RNC Co-Chair **Maureen Reagan** and Committee Co-Chair **Senator Bob Kasten**, Mr. Salem cited the "tornado of political violence and unrest" in the Occupied Territories as evidence of the failure of U.S. policy in the region. Noting the brutal tactics used by Israeli soldiers and the resulting deaths and injuries, Mr. Salem stated that these "atrocities should weigh heavily on the conscience of American taxpayers."

In concluding, Mr. Salem urged the Committee to include in the Party's platform a plank supporting Palestinian statehood. A copy of the press release on the hearing is enclosed. A full transcript of Mr. Salem's testimony is available upon request.

The platform process continues with hearings in Kansas City on May 31st, covering domestic and natural resources issues; in Los Angeles on June 30th, covering economic and international trade; and in New Orleans before the national convention in August with the full platform committee meeting. Arab Americans will be meeting with the committee staff in late April to discuss how our community can play a greater role in the process and to insure our concerns receive a hearing before committee.

* In a related note, The Washington Post reported on April 11th that New Hampshire **Governor John Sununu** has been assigned a new job in the Bush campaign by the Vice President. According to the Post's report, Bush aides said the Governor has been designated to oversee platform issues.

[5] **Governor Victor Atiyeh** was in Washington in late March, meeting with Vice President Bush and George Bush for President campaign officials. The campaign, now laying the groundwork for general election, discussed with the Governor the preparation of plans for active Arab American participation in the fall. Governor Atiyeh informed the campaign that efforts to build support for the Vice President in the Arab American community has already succeeded in producing offers of volunteer support in 20 states. The Governor expressed his belief that the Arab American community was willing to play a full role in the Bush campaign and welcomed the organization's efforts to bring Arab Americans into the process.

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[6] In California, the main focus of Arab American Republican political activity centers on the June 7th primary, now little more than a month away, where congressional races and important central committee contests are to be decided.

* **Sam Badawi** has a lock on a Republican Party Central Committee seat in Santa Cruz County. The March filing deadline passed with five candidates, including Mr. Badawi, remaining uncontested, for the central committee in the 5th district.

* In San Mateo County, **Bashir Meer** collected 50 signatures to ensure his presence on the June 7th ballot for a Republican Party central committee seat. Mr. Meer is running in San Mateo's 3rd county district.

* The Executive Board of the San Jose/South Bay chapter of NAAA met with Republican candidate for California's 12th congressional district seat, **Tom Campbell**, on March 25th. The meeting was arranged by **Sami Ibrahim**, acting as liaison between the Campbell campaign and the chapter. Also attending the meeting were **Abdel El-Shaieb** and **Isam Qubain**. All three gentlemen are members of the Arab American Republican Club of Santa Clara County. Both Campbell and Republican incumbent Rep. **Ernie Konnyu** attended the NAAA chapter's annual banquet on April 9th.

* **Mounzer Chaarani**, Chairman of the Arab American Republican Club of Orange County, reports that the club is keeping a watchful eye on the race for the Republican nomination in the 40th congressional district. The race for the open seat, created by the decision of incumbent Rep. **Robert Badham** not to run for a 7th term, has produced a host of would be contenders. The Orange County club has already met one of the leading candidates, **Nathan Rosenberg**, and hopes to meet with others before the June 7th primary, including another front runner, **Dave Baker**.

An April 15th meeting of the club featured **Costa Mesa City Councilman Peter Buffa**, who only recently withdrew from the congressional race. **Norman Tanber** reports that Mr. Buffa, who is of Italian descent, spoke of his own experiences in meeting with ethnic prejudice and stressed active political participation as a means of overcoming such prejudices.

In another California congressional race, the Orange County club lent its support to Arab American **Luis Acle** at a fundraiser on April 8th. Mr. Chaarani notes that Mr. Acle was able to meet members of the local community and share with them the progress of his campaign. Mr. Chaarani said that he also hoped that club could further aid in Mr. Acle's campaign in the near future.

* In Los Angeles, **Paul Stephen**, President of the William

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Neima Club, a group of active Arab American Republicans, reports that the club will be holding a May 20th reception for Republican Minority Leader of the California Assembly **Pat Nolan**.

[7] **Mike Sarafa**, running hard for the state legislature in Michigan, picked up two key endorsements in the past weeks. **Colleen Engler**, a former candidate for lieutenant governor and also a former legislator, endorsed Mr. Sarafa after a meeting with the candidate in early April. **California State Senator Waddie Deddah**, a prominent member of the Chaldean community, also lent his support to Mr. Sarafa's effort. The campaign kicks-off with a fundraising event on May 5th.

[8] **Luis Acle's** campaign continues in his race for 44th congressional seat. The campaign got a big boost on April 7th when **Congressman Duncan Hunter** of the 45th district formally endorsed Mr. Acle. Congressman Hunter's endorsement, whose old district covered about 80% of the current 44th, is considered significant in that it brings to the campaign many new supporters and volunteers. The next major event for the campaign comes on April 30th when **Senator Alan Simpson (R-WY)** comes to San Diego for a major fundraising event.

Mr. Acle now faces a June 7th Republican primary challenge from San Diego attorney **Rob Butterfield**. In a district where Democrats outnumber Republicans by almost 2-1, one stark difference between the candidates is in their strategy for appealing to Democratic voters. Mr. Acle believes that his conservative approach will appeal to traditional and fiscal conservative Democrats disaffected with present incumbent **Rep. Bob Bates'** liberal record. Mr. Butterfield's approach is more moderate and liberal on the issues, leading Mr. Acle to feel it difficult for any Republican to out-liberal Bates as a way of attracting Democratic voters.

[9] The Iowa caucuses are but a faint memory but **Tony Nassif** of Cedar Rapids continues his work on behalf of the remaining Republican contender, **Pat Robertson**. Mr. Nassif opted against continuing on in caucus process and instead put in six weeks of work in California, mainly in Los Angeles and Orange County, working as the special events coordinator for the campaign.

[10] The Arab American Republican Federation now has **access to a fax machine**. The machine enables us to send written information over telephone lines, faster, quicker and more reliable than conventional methods. For those with access to a fax machine **our number is (202) 429-9214**. To take full advantage of this system it also requires us to have knowledge of your fax number. If you have a fax, or access to one, please let us know the number.

The preceding report was compiled by Charles Zogby.

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Arab American
Republican
Federation



Election '88 Report
May 1988

Vice President Bush formally sealed the Republican presidential nomination with a victory in Ohio's May 3rd primary, as the state put him over the top in the delegate count. Surveying the latest round of primaries, Arab Americans continue to make impressive gains in the delegate process and are now set to turn their attention towards organizing for the general election.

[1] In Ohio, George Bush's sweep of the state's May 3rd primary produced the second Arab American delegate to the 1988 Republican National Convention. **Norman Murdock**, Hamilton County Commissioner and long-time Republican office holder, will be an at-large delegate in the Ohio delegation. Mr. Murdock has indicated interest in representing Ohio on the Platform Committee at the convention.

[2] **Raymond Howar** was elected as a Bush alternate delegate in the District of Columbia's May 3rd primary and will also be headed to New Orleans. Elected from DC Ward #1, Mr. Howar is also an active member of the District's business community.

[3] In Colorado, delegates elected at the April 4th precinct caucuses attended county conventions across the state on April 23rd. **Sherine Hamawy Centenari**, elected as a Bush delegate in Denver County, was selected to move onto the June 4th State Convention. Ms. Centenari also notes that she had the opportunity to meet Neil Bush, the Vice President's brother, at the county convention.

[4] In a late update report from Georgia, **Mary Zumot** was elected as a Bush precinct delegate from DeKalb County's precinct 5, in the 4th congressional district. Ms. Zumot went onto the county convention and from there was elected to attend the state convention in Albany, GA on April 18th.

[5] Also, in addition to our earlier reports on the activities of **Governor John Sununu** of New Hampshire, we neglected to include that the Governor is a Bush delegate and will also be acting as chairman of the New Hampshire delegation to the Republican National Convention in August.

* * * *

Arab Americans for George Bush

January 4, 1987

Dear Fellow Arab American,

In 1988 Arab Americans face the important task of electing a leader who will ready this great nation to meet the challenges of tomorrow. Our community will be looking to a candidate with leadership and experience. We need a candidate who brings to the presidency the knowledge and capabilities to make the tough and balanced decisions that will allow us to respond to the needs of this country.

I believe that Vice President George Bush offers these unique qualities and that is why I am asking for your support to help make George Bush the next President of the United States.

I am convinced that a George Bush presidency would be one of leadership, vision and integrity.

The crucial issues that face this country in the years ahead, the issues that Arab Americans are most concerned with, are in the area of foreign policy. George Bush is alone among the candidates in his ability to deal with the complex and difficult international questions that we face. The Vice President's experience and personal involvement are vital assets in our working together to resolve these critical issues.

Governor John Sununu of New Hampshire, an Arab American and a National Co-Chair of the Bush campaign, has pledged to make this a winning campaign and to do everything to achieve that goal. I share with him the goal of electing George Bush and ask you to join with us today in this pledge.

Arab Americans for George Bush will not only be committed to electing our candidate as the next president, but we will work to bring Arab Americans into every level of the campaign process.

Please use the enclosed form to join me in this effort. Sign-up today to work with me to bring Arab Americans in at all levels of the process. Additionally, your contribution of \$1000, \$500, \$250 or \$100 will help bring the message of Arab Americans to the Bush campaign.

We have a great deal of work before us, but I am confident that together we can make a difference.

Sincerely,


Victor Atiyeh
Chairman

P.O. Box 65153, Washington Square Station, Washington, D.C. 20035

93043500862

Arab Americans for George Bush

YES! Governor Atiyeh, I want to join Arab Americans for George Bush. Please make me part of the effort to elect George Bush and bring Arab Americans into the campaign process.

Name _____

Occupation/
Employer _____

Address _____

Phone (day) _____ / _____ (eve) _____ / _____

* * *

I would like to sign-up to:

_____ Work as a volunteer at the George Bush for President campaign office in my city.

_____ Help raise an additional \$500 from family and friends.

_____ Organize an Arab American support network for George Bush in my community.

* * *

Also, Enclosed is my contribution to the Arab Americans for George Bush effort:*

☐ \$100 ☐ \$250 ☐ \$500 ☐ \$1000 ☐ \$ _____

* **Note:** Please make checks payable GEORGE BUSH FOR PRESIDENT.

Please return to:

Arab Americans for George Bush
P.O. Box 65153
Washington Square Station
Washington, DC 20035

P.O. Box 65153, Washington Square Station, Washington, D.C. 20035

93043500863

Arab American
Republican
Federation



February 11, 1988

George Bush for President
c/o Ede Holiday
733 15th Street, NW
Suite 800
Washington, DC 20005

Dear Ms. Holiday,

Enclosed is an invoice for the Arab American Republican Federation's mailing on behalf of George Bush. I have also enclosed copies of the receipts for each aspect of the mailing.

I hope everything is in the correct order.

Sincerely,

Charles Zogby

GEORGE BUSH FOR PRESIDENT

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DELUXE - FORM WVO-4 V-2

DATE	DESCRIPTION	AMOUNT
02/11/88	INVOICE 1222 / REIMBURSEMENT FOR MAILING	\$1988.26



*Snap
off*

**CARBONLESS
FORM 3713**

NO
CARBON
REQUIRED

INVOICE
TRIPLICATE

INVOICE

NO. *1222*

DATE 2/11/88

YOUR
ORDER NO.

OUR
ORDER NO.

FROM: Arab American Republican Federation
918 16th Street, NW, #500
Washington, DC 20006

SOLD TO . George Bush for President
c/o Ede Holiday
733 15th Street, NW
Suite 800
Washington, DC 20005

SHIP TO

F.O.B.		TERMS	DATE SHIPPED	SHIPPED VIA	SALESMAN		
ORDERED	SHIPPED	DESCRIPTION			PRICE	PER	AMOUNT
		* Post Office Box					\$ 11.00
		* Mailing Labels					115.00
		* Letterhead and Stationary					810.00
		* Postage (4783 pieces @ \$.22)					1052.26
		Total...					\$1988.26

TOPS NO. 3713
LITHO - USA

ORIGINAL

9 3 0 4 3 5 0 0 8 6 5



84105

City Duplicating Center, Inc.

1617 EYE STREET, N.W. • WASHINGTON, D. C. 20006 • 296-0700

multilithing
mimeographing
addressographing
typing
mailing

October 20, 1988

Arab American Institute
918 - 16th Street, N.W., #501
Washington, DC 20006

Job No. 6847

Litho-3M, 900 copies 2 pages backed up
900 copies 2 pages backed up
900 copies 1 page
900 copies 1 page

Assemble, paper stock

Paste 888 labels, prepare for and mail

\$ 297.18

Sales Tax

17.84

\$ 315.02

*Rep Fed.*CK # 1034
11-9-88

TERMS: NET 30 DAYS OF MONTH FOLLOWING DATE OF PURCHASE. - NO STATEMENTS RENDERED

ARAB AMERICAN REPUBLICAN FEDERATION
918 - 16TH ST., N.W., SUITE 501
WASHINGTON, D.C. 20006

1034

PAY
TO THE
ORDER OFCity Duplicating Center, Inc.
Three Hundred Fifteen 02/100

Nov 9 1988

15-55/540

\$ 315.02

DOLLARS

AMERICAN SECURITY BANK, N.A.

City Office
1617 K Street, N.W.
Washington, D.C. 20006

FOR # 6847

⑈001034⑈ ⑈05400055⑈ ⑈13⑈ 865 61 313⑈

U.S. POSTAL SERVICE
WASH. DC, STA. 294
1050 CT. AV. NW 20035-9999

REQUEST FOR PAYMENT

CLERK #05
DATE: 10/20/88 10:42:26 AM

090 POSTAGE 662.00

TOTAL: \$ 662.00
CHECK TENDERED \$ 662.00

U.S. Post - Wash. DC

Amount: \$ 662.00

Stamps Ref'd = 222
Dem Fed = 344
Last check date
10-20-88

Description of Expenditure: 2650 - 1st class stamps
for Dem. & Rep Fed. GOTV mailings
222.50 - Rep. 439.50 - Dems.

Charge: AAI WMEA SAVE LEBANON
(Identify Project)

Vote '88.

Approved by: [Signature] Date: 10-19-88

ARAB AMERICAN REPUBLICAN FEDERATION
918 - 16TH ST., N.W., SUITE 501
WASHINGTON, D.C. 20006

1035

PAY
TO THE
ORDER OF

Arab American Institute
Two Hundred Twenty Two 50/100

\$ 222.50

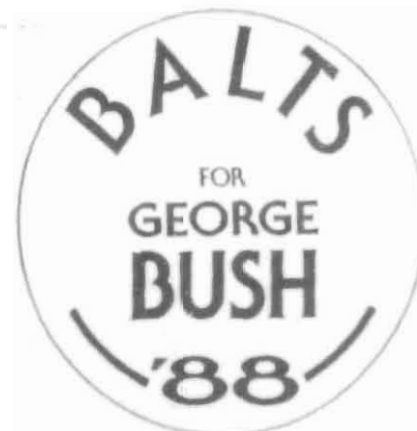
DOLLARS

AMERICAN SECURITY BANK, N.A.
City Office
1812 K Street, N.W.
Washington, D.C. 20006

FOR Postage

⑈001035⑈ ⑈054000551⑈ ⑈13⑈865 61 313⑈

9 3 0 4 3 5 0 0 8 6 8



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ARAB AMERICAN REPUBLICAN FEDERATION

918 - 16TH ST., N.W., SUITE 501

WASHINGTON, D.C. 20006

1029

August 2 1988

15-55/540

PAY
TO THE
ORDER OF

P.C. Button Company / Frank Enten

\$ 1293.75

One thousand ninety three dollars

75/100 DOLLARS



AMERICAN SECURITY BANK, N.A.

City Office

1613 R Street, N.W.
Washington, D.C. 20006

FOR

⑈001029⑈ ⑈05400055⑈ ⑈13⑈865 61 313⑈

⑈0000129375⑈

Arab American
Republican
Federation



April 27, 1987

Radi Slavoff
National Republican Heritage Groups Council
310 First Street, S.E.
Washington, DC 20003

Dear Radi,

Enclosed please find check #1007 in the amount of \$250
in payment of the Arab American Republican Federation's member-
ship dues for 1987.

Please note that the Federation still needs to forward
its membership list to the Heritage Council but we fully expect
to have this completed in time for the 1987 convention. Thank you.

Sincerely,

Charles Zogby

cc: Nader Sayegh
Mounzer Chaarani

93043500870



Arab American Republican Federation

September 18, 1986

Radi Slavoff
National Republican Heritage
Groups Council
301 First Street, SE
Washington, DC 20003

Dear Radi,

Enclosed please find check number 1002 in the amount of \$250.00 from the Arab American Republican Federation. This is in accordance with the Executive Board's decision at the September 13th board meeting to assess each nationality federation \$250 to meet some of the outstanding expenses of the Council.

There is a general agreement within the Arab American Republican Federation that the plan, raised by Finance Chairman Tom Angott whereby each nationality federation and each state council would be asked to donate or commit to the Council \$1000 each fiscal year, is in fact doable. There is no reason why the Council's members should not sustain their own organization.

But there is also a concern that the Finance Committee, upon presenting this idea to the Executive Board, also needs to present a plan as to how this money will be spent. A line item proposal on how this money will be allocated would be helpful in discussing this proposal at the next board meeting.

Sincerely,

Charles Zogby
Secretary



Arab American Republican Federation

June 4, 1986

Radi Slavoff
Nat'l Republican Heritage Groups Council
310 First Street, SE
Washington, DC 20003

Dear Radi,

Enclosed please find the Arab American Republican Federation's membership report for 1986.

The report includes membership lists for the Federation's ten chapters, along with check number 1001 for \$260.00 to cover the Council's dues requirements.

Sorry for the tardiness of this report. I hope that you find everything in order. Thank you.

Sincerely,

Charles Zogby
Recording Secretary

CZ/se
Enclosures

ARAB AMERICAN REPUBLICAN FEDERATION
918 - 16TH ST., N.W., SUITE 501
WASHINGTON, D.C. 20006

1001

15-55/540

PAY
TO THE
ORDER OF

National Republican Heritage Groups Council

June 4 1986 \$ 260.00

Two hundred sixty dollars

00/100 DOLLARS

AMERICAN SECURITY BANK, N.A.
City Office
1612 K Street, N.W.
Washington, D.C. 20006

FOR

Arab American
Republican
Federation



Convention

August 31, 1988

Emma Barnsley
150 East 61st Street
New York, NY 10021

Dear Ms. Barnsley,

I want to thank you for the support you have given to the Arab American Republican Federation and to the Federation's work over the last several months. With your help we have been able to carry on with our membership recruitment, organizing and convention activity plans -- each of which has worked to make this organization a viable one.

As a small token of our appreciation, I have enclosed a special, limited edition "Arab Americans for George Bush '88" pin -- made especially for Arab American activities at the Republican National Convention in New Orleans.

Again, I want to thank you for your continuing support for our efforts to build a strong Arab American presence in the Republican Party.

Best wishes,

Charles Zogby

93043500873

9 3 0 4 3 5 0 0 8 7 4

Arab American Supporters

of

George Bush

cordially invite you to a

GALA RECEPTION

on

Monday, August 15, 1988

six until eight o'clock in the evening

in Galerie 6

Marriott Hotel

555 Canal Street, New Orleans

hosted by the

Arab American Republican Federation

with special thanks to the

National U.S.-Arab Chamber of Commerce

*RSVP: Arab American
Republican Federation
202/429-9210*

*Arab American Republican Federation
918 Sixteenth Street
Suite 501
Washington, D.C. 20006*

23043500875
RECEIVED

ARAB AMERICAN REPUBLICAN FEDERATION

918 16th Street, N.W., Suite 501, Washington, D.C. 20006

- ☐ **YES!** I declare my support for the Republican campaign and for a strong Arab American Republican organization.
- ☐ Enclosed is my \$3.00 for 1988 dues to help build a strong Arab American Republican Federation.*
- ☐ Renewal Member ☐ New Member

*Subscribing members will receive Election '88 Reports.

Bush 88 Quayle

FOR IMMEDIATE RELEASE
October 20, 1988

Contact: Leslie Goodman
(202) 624-8399

BUSH-QUAYLE '88 CAMPAIGN ANNOUNCES ARAB AMERICAN COMMITTEE

WASHINGTON, D.C. -- The Bush-Quayle '88 campaign announced today the formation of Arab Americans for Bush-Quayle '88 Committee, under the honorary chairmanship of former Oregon Governor Victor Atiyeh. Department of Labor Solicitor George R. Salem of Springfield, Virginia, will chair the committee, which is charged with mobilizing support in the Arab American community on behalf of the Vice President.

In accepting the honorary chairmanship of the Committee, Governor Atiyeh called on his fellow Arab American to support the election of George Bush for President. "George Bush is the only candidate who has an intimate knowledge of this nation, its hopes, concerns and vision for the future", said Governor Atiyeh.

Mr. Salem welcomed the formation of the Arab American Committee, stating that "Arab Americans welcome the opportunity to participate in the campaign and look forward to working in the neighborhoods and the precincts on behalf of the Vice President." Mr. Salem went on to note that, "George Bush's record and message of traditional values, God, family, and economic opportunity reflects the concerns and values of the Arab American community."

Also named to the Committee as Vice Chairs were Senator James Abdnor, Administrator of the Small Business Administration, of Washington, D.C.; Spencer Abraham, Chairman of the Michigan Republican Party, of Lansing, Michigan; Michael Barody, Assistant Secretary for Policy for the U.S. Department of Labor, from Alexandria, Virginia; Mounzer Chaarani, President of Chaarani and Associates, of Santa Ana, California; Mitchell E. Daniels, Jr., President, Hudson Institute and former Assistant to the President for Political and Intergovernmental Affairs, of Indianapolis, Indiana; George Milhim, Mayor of the Village of Hempstead, of Hempstead, New York; Mae Moussa, Former Chairwoman of Republicans Abroad, Lebanon; of Washington, D.C.; Fuad Sahouri, Chairman of the American Arab Business Association, of Great Falls, Virginia; Col. Alfred H.M. Shehab, Chairman of the Board of the National Association of Arab Americans, of Odenton, Maryland; and Dr. Peter Tanous, Former Chairman of the Board of the National Association of Arab Americans, of Bethesda, Maryland.

-- 30 --

AN OPEN LETTER TO THE ARAB AMERICAN COMMUNITY
FROM CONGRESSMAN PAUL FINDLEY ON THE
1988 PRESIDENTIAL ELECTION

Dear Friends

While lacking Arab ancestry -- I wish I had some to brag about! -- I feel very much an Arab American in spirit. My endeavors for peace and justice in the Middle East since 1973, including my book, They Dare to Speak Out: People and Institutions Confront Israel's Lobby make me strongly sympathetic to Arab grievances.

As a 22-year Republican veteran of Congress, I recognize the crucial importance of U.S. policy in bringing, at long last, redress of these grievances. In fact, I am convinced that only resolute leadership by the next U.S. president will avert a terrible new calamity in the Middle East that may engulf the U.S. in war.

I have every confidence that George Bush will provide that leadership. I base my forecast on personal acquaintance covering more than 20 years and this includes private conversations and correspondences on the Arab-Israel dispute, several years ago. It is noteworthy that when I was under heavy attack by Israel's lobby in my ill-fated 1982 campaign, he resisted lobby pressure and spoke in my behalf at a home-district fundraiser.

He knows the Middle East and its cross-currents like the back of his hand. In our nation's most important ambassadorships, as director of the Central Intelligence Agency, and for the past eight years as Vice President, Mr. Bush has witnessed firsthand the frequent and substantial damage Israel's lobby causes to our national interests.

On the Democratic side, Michael Dukakis is a dangerous novice. Given this handicap and the enormous financial support he is accepting from pro-Israel political action committees, he could, as president, be no more than Israel's errand boy.

Don't be confused by last-minute campaign bombast. George Bush knows what must be done in the Middle East, and he has the strength and skill to succeed. You can count on him to assert effectively our own national interest when it diverges from Israel's, and Americans of Arab ancestry owe it to themselves to give him their utmost support.

Your friend,

Paul Findley

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VICE PRESIDENT GEORGE BUSH ON ISSUES
OF CONCERN TO ARAB AMERICANS

Arab Americans face a choice between two very different candidates this November when they go to the polls to determine who will lead this nation for the next four years. But there is only one candidate whose record and message of traditional values, of God, family and economic opportunity reflect the values of Arab Americans. That candidate is George Bush. Below are George Bush's positions on issues of concern to Arab American voters.

o The Middle East Peace Process

While Arab Americans have expressed concern over George Bush's Middle East policy, statements the Vice President has made on the issue are stronger and more positive than that of his opponent. While George Bush has said that he does not support a Palestinian state, he has at the same time stated that if the parties to any negotiations agree that there should be a state that he would not oppose it. George Bush also opposes moving the U.S. Embassy to Jerusalem. Michael Dukakis says he supports the move.

"The Palestinians must be involved at every step in the negotiations. There will be no peace without them. But we must be clear on another matter too. The annexation of the territories by Israel or their permanent control by military occupation" will not lead to peace. 9/7/88

o Lebanon

George Bush is committed to an independent, peaceful and democratic Lebanon. George Bush believes that U.S. policy should be based on the principles of preserving the unity of Lebanon; recognition of and respect for the territorial integrity of Lebanon and the reassertion of Lebanese sovereignty. George Bush has stated that he has a personal, special investment in a Lebanon at peace.

o George Bush on Values, the Individual and Family

"My view of America's future... means viewing government as the last, not the first, recourse in solving problems. I believe, as did Jefferson and Lincoln, that the sole purpose of government is to do for people what they can't do for themselves; that political and social freedom is tied to economic freedom; and that the proper role of a President is to develop a domestic and social agenda to improve the quality of American life through a free, competitive market place, not only of products but ideas ...[E]ach individual is entitled to a fair opportunity to fulfill his or her God-given potential." From "Looking Forward" by George Bush

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Arab American
Republican
Federation



October 19, 1988

Dear Arab American Republican,

Election day is near, and as usual, all of us are surrounded by political activity. This year's presidential election will likely shape the future direction of our country for many years. That is why political involvement, especially **voting**, is so important.

In the past, many of us have rallied behind important causes. This year, we realize that the presidential campaign has not generated the expected enthusiasm. Yet, as an Arab American community, we must not use this as an excuse to remain on the sidelines. Our goal of full **political empowerment** for Arab Americans is more critical than ever.

With that in mind, we have forwarded some information that we feel will be helpful. Enclosed is an issue sheet outlining some of Vice President Bush's stances on important issues of concern to Arab Americans. Also enclosed is an open letter to Arab Americans from former Congressman Paul Findley explaining why he thinks George Bush is the best candidate for President. We hope this information will help you generate support for Vice President Bush. If we sit this one out, the only losers in the end will be ourselves. Remember, the big picture is **Arab American political empowerment!**

Therefore, we urge you to get involved - to take the lead in local and state efforts in your area. We encourage you to help organize Arab Americans in your community and to build relations with your local, county and state Republican parties. With a **formalized and institutionalized presence**, we will continue to make an impact long after 1988. Each year we are getting stronger, but we need to broaden our base and stay involved.

One way we can continue to organize is to build and expand the **Arab American Republican Federation**. Enclosed is a Federation brochure. Please take the time to join or renew your membership. The fee is minimal. This will greatly assist us in

93043500879

Arab American
Republican
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October 19, 1988

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keeping track of Arab American Republican affairs across the country and in the broadening and development of local Republican clubs or organizations.

Also included is a copy of a press release we sent out announcing the formation of the **Arab American for Bush/Quayle Committee**. Please feel free to call us with any comments or questions at (202) 429-9210. Your input and participation are greatly appreciated.

Sincerely,

Mike

Mike Sarafa



Charles Zogby

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VICE PRESIDENT GEORGE BUSH ON ISSUES
OF CONCERN TO ARAB AMERICANS

Arab Americans face a choice between two very different candidates this November when they go to the polls to determine who will lead this nation for the next four years. But there is only one candidate whose record and message of traditional values, of God, family and economic opportunity reflect the values of Arab Americans. That candidate is George Bush. Below are George Bush's positions on issues of concern to Arab American voters.

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o George Bush on Racism and Bigotry

"I hope to stand for a new harmony, a greater tolerance. Racism has no place in American society. We've come far, but I think we need a new harmony among the races in our country. We're on a journey to a new century, and we've got to leave the tired old baggage of bigotry behind. I want a kinder, gentler nation." 8/18/88

o George Bush on Business and the Economy

George Bush is committed to keeping our economy on the path that has created 18 million new jobs, the majority of these jobs coming from growth in small businesses. George Bush is the only candidate that has promised NOT TO RAISE TAXES. George Bush supports a balanced budget amendment to the constitution, the line-item veto to reduce spending and a cut in the capital gains tax rate to encourage investment and business formation.

o George Bush on Education

"Our program for the future must be built around a strategy of investing in our children. Support for educational excellence will be a primary goal of a Bush Administration because teachers, schools, colleges and universities are so vitally important to the character, strength, and quality of our society and nation." George Bush Issue Statement, 1980

George Bush believes America must invest in education and supports an emphasis on the basics, seeking to strengthen our traditional educational values. George Bush proposes college tax-free savings bonds to help families save for their children's college education. George Bush supports the right for children to pray in school.

o George Bush on Crime and Drugs

"Fighting crime must be a high priority for the next four years. Let's close the loopholes that let crooks go free to repeat their offenses. I want to stop hamstringing our police. Let's strengthen the laws that protect the victim, not the criminal." George Bush Issue Statement, 1980

George Bush supports mandatory sentencing for criminals, has said no to furloughs for killers and will appoint judges who will crack down on criminals. George Bush also supports drug education as part of the curriculum at every level of the public schools.

Arab American Supporters for George Bush
918 16th Street, NW, Suite 501
Washington, DC 20006

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Arab American
Republican
Federation



July 21, 1988

Ronald Assaf
500 NW 12th Avenue
Deerfield Beach, FL 33441

Dear Mr. Assaf,

I have enclosed a copy of the April 28th letter from Governor Victor Atiyeh to which I referred you to in our conversation of July 21st.

I should note that the Federation did send the mailing discussed in the Governor's letter -- the response was tremendous, netting the Federation over 150 new members.

Our present need for your financial support is to assist the Federation in implementing its program for the Republican National Convention in New Orleans next month. We are planning an "Arab American Supporters for George Bush" reception at the convention, with Governor John Sununu as our guest speaker. We will also be lobbying the platform committee members on the issues of Lebanon sovereignty and Palestinian statehood.

I would sincerely hope that you would be able to assist our efforts with a contribution of \$100 or more. I have enclosed an envelope for your use.

Thank you for your consideration of our request.

Sincerely,

Charles Zogby

93043500884

Arab American
Republican
Federation



July 18, 1988

Michael Hadeed, Jr.
1504B Mt. Vernon Avenue
Alexandria, VA 22301

Dear Mike,

As you requested, here's a note to remind you of the \$75 you had said that you could help us with for the Federation's efforts at the Republican National Convention. I have enclosed an envelope that you can use to forward the contribution to our office.

Thanks again for all your help.

Sincerely,

Charles Zogby

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Arab American
Republican
Federation



August 31, 1988

Albert Phillips
240 Cardamon Drive
Edgewater, MD 21037

Dear Mr. Phillips,

I want to thank you for the support you have given to the Arab American Republican Federation and to the Federation's work over the last several months. With your help we have been able to carry on with our membership recruitment, organizing and convention activity plans -- each of which has worked to make this organization a viable one.

As a small token of our appreciation, I have enclosed a special, limited edition "Arab Americans for George Bush '88" pin -- made especially for Arab American activities at the Republican National Convention in New Orleans.

Again, I want to thank you for your continuing support for our efforts to build a strong Arab American presence in the Republican Party.

Best wishes,

Charles Zogby

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Arab American
Republican
Federation



July 18, 1988

Emma Barnsley
150 East 61st Street
New York, NY 10021

Dear Ms. Barnsley,

I want to thank you very much for your enthusiastic support of the Arab American Republican Federation's efforts to raise our community's visibility and issues at the Republican National Convention.

I have enclosed an envelope for you to use to forward your contribution. As I noted, we are asking each individual for a \$100 contribution to help us meet our costs but any additional support you could give us would be greatly appreciated.

Thank you again for all of your help.

Sincerely,

Charles Zogby

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Arab American
Republican
Federation



July 15, 1988

Safi Kaskas
35 Plover Street
New Orleans, LA 70124

Dear Mr. Kaskas,

I wanted to inform you of the some of the activities that Arab Americans are now in the process of planning at the Republican National Convention in New Orleans to be held in New Orleans from August 15th -18th. I also wanted to speak to you concerning our efforts to involve the Arab American community in New Orleans in the activities (I attempted to reach you by phone but your number was unlisted).

Arab American efforts at the convention will focus on a hospitality reception for Republican party officials and delegates to be held on Monday, August 15th from 6:00 p.m. to 8:00 p.m. at the Marriott Hotel. This reception is sponsored by "Arab American Supporters of George Bush" and will feature Governor John Sununu of New Hampshire as our guest speaker and will include Arab American delegates to the convention as well as Arab American elected and public officials.

We are very interested in having the local community be a part of this event and would like to begin arranging these plans as soon as possible.

I was hoping that you could help our efforts to plan this event by putting me in touch with members of our community in the New Orleans area. I would appreciate it if you could call me as soon as possible at 202/429-9210 so that I could at least provide you with some greater detail on our plans.

Thank you for your assistance and I look forward to hearing from you.

Sincerely,

Charles Zogby

9304350888



Arab American
Institute

NEWS ★ RELEASE

FOR IMMEDIATE RELEASE:
March 31, 1988

FOR INFORMATION:
Charles Zogby
(202) 429-9210

ARAB AMERICAN INSTITUTE BOARD MEMBER TESTIFIES BEFORE REPUBLICAN PLATFORM COMMITTEE

George Salem, Board Member of the Arab American Institute, testifying before the Republican Party's Platform Committee, today urged the Party to include in its platform a plank calling for Middle East peace based on the formula of Palestinian self-determination, with rights to statehood.

Speaking before the Committee, which included Republican Chairman Frank Fahrenkopf and Committee Co-Chair Senator Bob Kasten, Mr. Salem cited the "tornado of political violence and unrest" in the Occupied Territories as evidence of the failure of U.S. policy in the region. Referring to the systematic beatings of Palestinians by Israeli soldiers, the over one hundred Palestinians killed by the military and the mass arrests and administrative detention without charge, Mr. Salem noted that these "atrocities should weigh heavily upon the conscience of American taxpayers, whose tax dollars are funding the brutal activities of these soldiers."

Mr. Salem called for Palestinian self-determination, with rights to statehood, the right of Palestinians to be represented

--more--

918 Sixteenth Street NW
Suite 501
Washington, DC 20006

(202) 429-9210

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Respectfully submitted,

Date: 6/28/89


Charles Zogby

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RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

WILEY, REIN & FIELDING JUN 28 PM 4:35

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

JAN W. BARAN
(202) 429-7330

June 28, 1989

TELECOPIER
(202) 429-7049
TELEX 248349 WYRN UR

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attn: Keith Morgan

Re: MUR 2767

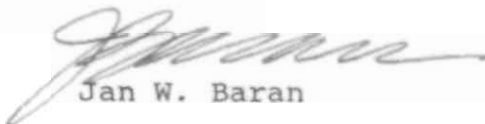
Dear Mr. Noble:

I am writing this letter to request an additional extension of time of two weeks to respond to the Interrogatories and Request for Documents issued by the Federal Election Commission ("FEC" or "Commission") to Bush-Quayle 88, Inc. and J. Stanley Huckaby, as treasurer in the above-captioned MUR.

A response to the Commission's reason to believe finding is currently due on July 10, 1989. Unfortunately, due to the various vacation schedules of those individuals with whom we must consult in order to respond to the interrogatories and request for documents, we will be unable to obtain all of the information needed by that time. Thus, we respectfully request a two week extension of time to and including July 24, 1989 within which to respond. This requested extension will not prejudice the matter in any way.

Your favorable consideration of this request will be appreciated.

Sincerely,



Jan W. Baran

93043500891



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 30, 1989

Jan W. Baran, Esquire
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 2767
Bush-Quayle 88 and
J. Stanley Huckaby,
as treasurer

Dear Mr. Baran:

This is in response to your letter dated June 28, 1989, which we received on that same day, requesting an additional two weeks to respond to the reason to believe finding against your clients, and to answer the interrogatories and document requests in this matter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on July 24, 1989.

If you have any questions, please contact Keith V. Morgan, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in dark ink, appearing to read "Lisa E. Klein", is written over the typed name of the Assistant General Counsel.

BY: Lisa E. Klein
Assistant General Counsel

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WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

JAN W. BARAN
(202) 429-7330

July 24, 1989

TELECOPIER
(202) 429-7049
TELEX 248349 WYR BUR

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
29 JUL 25 PM 4:19

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attn: Keith Morgan

Re: MUR 2767

Dear Mr. Noble:

This Response is submitted on behalf of Bush-Quayle 88, Inc., and J. Stanley Huckaby, as treasurer, in reply to the Interrogatories and Request for Documents propounded by the Federal Election Commission on May 23, 1989 in Matter Under Review 2767.

Enclosed please find the sworn answers to these interrogatories and requests with accompanying affidavits.

Sincerely,


Jan W. Baran

Enclosures
cc: J. Stanley Huckaby

JWB:co

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RESPONSE OF BUSH-QUAYLE 88 TO THE
INTERROGATORIES OF THE FEDERAL ELECTION COMMISSION
IN MUR 2767

QUESTION 1

In regard to the fundraising letter sent out on Bush-Quayle 88 Coalition of American Nationalities letterhead and signed by William G. Chirgotis, Chairman of Greek Americans for Bush:

- a. identify the account from which funds came to finance the production and mailing of the letters, by financial institution, number, and account holder;
- b. state when the letters were sent and provide the costs for their preparation and distribution;
- c. state how much was received in contributions as a result of the solicitation;
- d. identify all persons who were involved in this fundraising activity;
- e. identify the account by financial institution, number, and account holder into which funds received from this solicitation were deposited;
- f. state how the funds derived from this letter were used.

RESPONSE

The letters sent out on Bush-Quayle 88 Coalition of American Nationalities letterhead and signed by William G. Chirgotis were not produced by or with the assistance of Bush-Quayle 88. To the contrary, as attested to by Ceci Cole McInturff, Director for the National Voter Coalitions for Bush-Quayle 88, Inc. at ¶ 4 of her Affidavit before the Federal Election Commission in MUR 2757 dated December 9, 1989 (hereinafter "MUR 2757 McInturff Aff.") "the National

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Voter Coalitions Office for Bush-Quayle 88 issued specific written instructions to Coalition leaders on at least two occasions forbidding them from raising funds on behalf of Bush-Quayle 88." As Ceci Cole McInturff explains in her Affidavit before the Federal Election Commission in MUR 2767 found at Attachment 1, (hereinafter McInturff Aff.) (quoted extensively herein at Response 3) the National Voter Coalitions of Bush-Quayle 88 was a division of the campaign run from Campaign Headquarters. This Campaign Division was separate and distinct from the coalitions of volunteers, such as Greek Americans for Bush, of which William Chirgotis held an honorific title. These coalitions of volunteers were not headquartered at the Campaign's offices, and in particular, Greek Americans for Bush did not operate out of the Campaign headquarters, contrary to the assertions in the Commission's Factual and Legal Analysis at pp. 4-5. Thus, there exists no Bush-Quayle 88 account from which funds came to finance the production and mailing of these letters.¹ Further, because Bush-Quayle 88 was in no way involved in the mailing of these letters, the Committee is unable to attest to when the letters were sent, nor can the Campaign provide information with regard to the costs of their preparation and distribution, because such preparation and distribution

¹ However, See Response to Question 4 below.

occurred without the knowledge of the campaign, and was unauthorized.

In addition, because this was not a Bush-Quayle 88 mailing, the Campaign can provide no assistance as to how much was received in contributions as a result of Mr. Chirgotis' mailing; who was involved in this fundraising activity, other than William Chirgotis as is apparent from his signature on the letter; the account and account holder into which funds received from this solicitation were deposited; or how the funds derived from this letter were used. In sum, Bush-Quayle 88 did not solicit or receive these funds.

QUESTION 2

Identify all advertisements placed in Greek American publications on behalf of Bush-Quayle 88, Inc. and identify the persons who paid for each such advertisement.

RESPONSE

To my knowledge, and after a review of the disbursement records with regard to the coalitions, Bush-Quayle 88 did not place any advertisements in Greek American publications. See also Affidavit of Mark Holman before the Federal Election Commission in MUR 2767 (hereinafter "Holman Aff.") at ¶ 3. Attachment 2.

QUESTION 3

Describe the relationship of Greek Americans for Bush with Bush-Quayle 88, Inc. Identify all documents which refer or in any way relate to such relationship.

RESPONSE

In order to fully understand the relationship of Greek Americans for Bush with Bush-Quayle 88, Inc., it is important to understand the National Voter Coalitions program itself and its relationship to coalitions formed by individual volunteers supportive of George Bush. Ceci Cole McInturff describes the National Voter Coalitions as follows:

The National Voter Coalitions Office was a division of the Bush-Quayle 88 campaign organization, and consisted of Bush-Quayle 88 paid staff and volunteers, whose job was to encourage volunteer groups which constituted the actual coalitions.

The National Voter Coalitions division of the campaign had its own budget with which it undertook the following activities: 1) Distributed Press releases for publicity purposes regarding the formation of volunteer national coalition steering committees; 2) Acted as a liaison to answer coalition-related questions from volunteer national coalition leaders and the public generally; 3) Encouraged individuals to contact their state's local Bush-Quayle 88 headquarters before undertaking any activity on behalf of the Bush-Quayle 88 Campaign; 4) Issued weekly mailings to the volunteer national coalition leaders, containing information regarding the activities of the Campaign, reprints of positive articles on the Campaign, and guidelines encouraging them to volunteer their time for Bush-Quayle 88 on a local level, register people to vote, and to try to generate local press within their specific coalition community by writing either editorial pieces or op-ed pieces for publication in their local or ethnic newspapers. This weekly mailing program also included a specific memo informing weekly mailing recipients that they were prohibited from raising funds on behalf of Bush-Quayle 88 and that they should undertake no organizational activity on the campaign's behalf without first checking with the state Bush-Quayle 88 leaders; 5) In specific cases, the Office of National Voter Coalitions paid from its limited budget for a

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speaking tour for surrogate speakers (for the women's coalition only); 6) The Office of National Voter Coalitions also paid for and directly placed newspaper advertisements in selected local ethnic newspapers urging readers to vote for Bush. None of these advertisements dealt with specific coalition organizational activity; 7) The Office of National Voter Coalitions also sent a handful of editorials by George Bush to ethnic newspapers and requested that those newspapers print the editorials on a voluntary basis. The only way which the Office of National Voter Coalitions knew whether or not these editorials had been printed was by asking the weekly mailing recipients to forward copies of editorials which did appear in their ethnic newspapers.

At the state level, volunteer coalition leaders and steering committee members were chosen only by Bush-Quayle 88 state campaign officials. As these volunteer state coalition leaders were chosen, their names were forwarded by Bush-Quayle 88 state campaign officials to the Office of National Voter Coalitions and added to the weekly mailing list.

Both national coalition leaders (chosen by the Office of National Voter Coalitions) and state coalition leaders (chosen only by state Bush-Quayle 88 officials) agreed to be publicly identified as supporters of George Bush, period. Each individual coalition had no specific charter, and no access to financial support from Bush-Quayle 88 or its Office of National Voter Coalitions beyond the aforementioned weekly mailings, surrogate speaking tour (women only) newspaper advertisements (which were placed only for ethnic coalitions). Most importantly, the individual coalitions of volunteers had no spending authority on behalf of Bush-Quayle 88, and they had no authority to raise or spend funds. Rather, the individual coalitions were comprised solely of volunteers, and those volunteers were encouraged to participate in activities such as writing Op-Ed pieces and Letters-To-The-Editor of local and specialty media. Each coalition leader received a Coalition Handbook which provided guidance as to permissible activities which could be undertaken by the coalitions.

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McInturff Aff. at ¶¶ 3, 4.

"Bush-Quayle 88 issued two press releases, one on October 5, 1988, and one on October 14, 1988, with regard to the formation of 'Greek Americans for Bush-Quayle '88.'" Holman Aff. at ¶ 2.

QUESTION 4

Describe the relationship of Mr. Charles Zogby with Greek Americans for Bush, and his role in the production and mailing of the fundraising letter sent out on Bush-Quayle 88 Coalition of American Nationalities letterhead and signed by William G. Chirgotis.

RESPONSE

According to Mark Holman, Deputy Director, National Voter Coalitions for Bush-Quayle 88 for whom Charles Zogby worked solely as a volunteer,

Bush-Quayle 88 produced a graphic letterhead for only a limited number of the volunteer Coalitions, and generally upon their direct request. Greek Americans for Bush was one of the coalitions which requested such letterhead, and received at the most, 150 sheets of letterhead.² This letterhead was to be used only to encourage others to volunteer their time for the campaign. Coalition leaders were told specifically in writing that they could not engage in fundraising on behalf of Bush-Quayle 88. Charles Zogby, a volunteer working in our offices, would have been the individual who sent the letterhead to Mr. Chirgotis.

The Campaign believed that the volunteer coalitions were following the restrictions and

² Note that Bush-Quayle stationery costs, at most, .05 ¢ per sheet. Thus, 150 sheets of stationery would have cost the Campaign, at most, \$ 7.50.

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guidance given them with regard to what was and was not permissible activity by volunteer coalitions. The Campaign, therefore, had absolutely no input or awareness prior to its distribution of the copy and content of the letter sent out on Bush-Quayle 88 Coalition of American Nationalities letterhead and signed by William G. Chirgotis.

I did not see the letter signed by William Chirgotis at issue in this matter until the Campaign received a copy of the complaint filed with the Federal Election Commission.

Holman Aff. at ¶¶ 7-9. See, id. at ¶ 1, 5.

While the Commission states in its Factual and Legal Analysis at p. 7 that Mr. Zogby supplied "advice on how to fundraise for the campaign", the General Counsel provided no evidence of Mr. Zogby's provision of such advice. Further, the Factual and Legal Analysis itself quotes from the October 12, 1988 Memo provided by the campaign in this MUR which prohibits volunteers from engaging in fundraising for Bush-Quayle 88. Finally, even were Mr. Zogby to have given such advice to another volunteer, contrary to the Campaign's written policy, he would not have been acting with either actual or apparent authority in so doing.

QUESTION 5

- a. In your December 21, 1988 response to MUR 2767, you state that Charles Zogby was an unpaid volunteer with National Voter Coalitions for Bush-Quayle. Please describe each and every activity Mr. Zogby engaged in as a volunteer and list, by date, amount, and purpose, every advance, reimbursement, and other payment you made to Mr. Zogby.

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RESPONSE

"Mr. Zogby was responsible primarily for drafting the weekly informational mailing . . . in addition to miscellaneous campaign related activities assigned by me." Holman Aff. at ¶ 10. See also McInturff Aff. at ¶ 6.

Mr. Zogby received a one time \$150 disbursement from Bush-Quayle 88 on October 25, 1988 as a parking stipend. This was consistent with the Campaign's general policy of providing a parking stipend to its volunteers who worked at the national headquarters for more than 30 hours per week. Mr. Zogby did not receive any travel reimbursements and, to my knowledge, did not travel on behalf of the campaign. Mr. Zogby received no other payments from the Campaign.

QUESTION 5b

Please identify all documents referring or in any way relating to communications between Mr. Zogby and Bush-Quayle 88, Inc. and all documents referring or in any way relating to Mr. Zogby's relationship with and/or activities on behalf of Bush-Quayle 88, Inc. Summarize all oral communications between Bush-Quayle 88, Inc. and Mr. Zogby.

RESPONSE

"Mr. Zogby's name would have appeared on the campaign's phone directory as well as on a directory of the National Office of Voter Coalitions. However, I do not know of any documents which relate specifically to communications or the relationship between Mr. Zogby and Bush-Quayle 88." Holman Aff. at ¶ 11. See also McInturff Aff. at ¶ 7.

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To my knowledge, as stated above, Mark Holman was the individual with the most direct contact with Mr. Zogby. According to Mr. Holman, "Mr. Zogby was in the office on a regular basis and our conversations involved the daily activities of the National Voter Coalitions of Bush-Quayle 88." Holman Aff. at ¶ 11. In addition, Ms. McInturff also had brief conversations with Mr. Zogby. She states "[a]ny of my communications with Mr. Zogby were along the lines of: 'Thanks for your help, and keep working hard.'" McInturff Aff. at ¶ 7.

QUESTION 5c

Please provide the dates, the names of those in attendance and the subject matter discussed for each and every meeting Mr. Zogby attended with staff members, officials, consultants or other agents of Bush-Quayle 88, Inc.

RESPONSE

As Treasurer of Bush-Quayle 88, I never met Mr. Zogby and am unaware of any meetings in which Mr. Zogby participated. As is clear in Ms. McInturff's Affidavit, Mr. Zogby did not attend any staff meetings of the National Voter Coalitions for Bush-Quayle 88. ("[V]olunteers did not participate in any staff meetings. Thus, while I did have weekly staff meetings, Mr. Zogby did not attend." McInturff Aff. at ¶ 8.)

On the other hand, Mr. Holman did apparently meet with those volunteers who worked under his direction.

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Specifically, he states "I met with the Ethnic Staff of the Coalitions division of Bush-Quayle 88 on a daily basis to informally discuss the progress of our campaign plan."

Holman Aff. at ¶ 12. Mr. Zogby was a volunteer member of that staff. See Holman Aff. at ¶ 7.

I am unaware of any other meetings which Mr. Zogby would have attended. See also Holman Aff. at ¶ 12.

QUESTION 6

With respect to the document attached hereto as Exhibit 1:

- a. Identify Arab American Supporters for George Bush and describe its relationship with Bush-Quayle 88, Inc. and the Bush-Quayle Coalition of American Nationalities.

RESPONSE

To my knowledge, there is no relationship between the Arab-American Supporters for George Bush and Bush-Quayle 88. See also McInturff Aff. at ¶ 9; Holman Aff. at ¶ 13.

QUESTION 6b

Identify the persons who prepared or reviewed the document and state whether you assisted in any way in the distribution of the document.

RESPONSE

With regard to Exhibit 1 attached to these interrogatories, the Committee has been unable to locate any individual who had previously seen this document or reviewed it on behalf of Bush-Quayle 88. See also McInturff Aff. at

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¶ 9; Holman Aff. at ¶ 13. Thus, to my knowledge, this is not a Bush-Quayle 88 document and did not contain a notice indicating that it was such a document.

QUESTION 7

Describe your relationship with the Arab-American Republican Federation ("AARF").

RESPONSE

Bush-Quayle 88 had no relationship with the Arab-American Republican Federation. See also McInturff Aff. at ¶ 10, Holman Aff. at ¶ 14.

QUESTION 8

In addition to those documents identified, produce copies of all documents that relate to your relationship with AARF or Greek Americans for Bush and any of their officers, directors or members.

RESPONSE

To my knowledge, no documents in addition to those already identified by the Commission in these interrogatories exist which relate to a relationship between AARF or Greek Americans for Bush and any of their officers, directors or members. See also McInturff Aff. at ¶ 11.

In addition to those answers provided above in direct response to the Commission's interrogatories in this matter, an outline of the Campaign's budget process may also be

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useful in this matter. The overall budget of the campaign was approved by the campaign chairman and myself. Although other campaign officials had roles in the budget's formation, no other individuals at Bush-Quayle 88, Inc. had authority to sign off on this overall budget on behalf of the Campaign. Once the Budget was approved, each Division Director, such as Ceci Cole McInturff, was told what the Budget for their Division was to be. Division Directors could only authorize expenditures within the restrictions (both by category and by overall total) of their specific pre-approved budget. If a Division Director wished to change the allocation approved in the Budget, he or she was required to submit a Budget Adjustment Form signed by the Director or the Director's designee which was then sent to the Campaign management for approval. If both the campaign chairman and I, or our designees, did not sign the approval form then the Budget was not changed, and the expenditure could not be made. Changes such as these were rare.

In terms of spending by the individual Divisions, of which there were eight or ten, the Division Director was solely responsible for the expenditures which were within their budget. If the proper documentation was not provided by the Division Director, or an individual designated by the Division Director, an expenditure was not made by that Division. For each expenditure there had to be a signed

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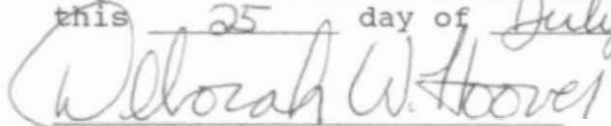
Commitment Form, Purchase Order, and Check Authorization from the Division Director.

Further, the Campaign staff was well aware of the restrictions on Campaign expenditures. Each paid staff member was required to fill out a form in which they acknowledged that they were not authorized to make expenditures on behalf of the Campaign, or to commit Campaign Funds. Volunteers were not asked to sign such a form, because the nature of their duties, and the campaign's structure, meant that there was no possibility of their making expenditures on behalf of Bush-Quayle 88, or "authorizing" such expenditures.

In sum, Ceci Cole McInturff was the only individual with authority to make expenditures on behalf of the Campaign for the National Voter Coalitions Division of Bush-Quayle 88. See also McInturff Aff. at ¶ 2.

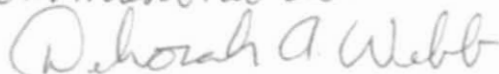

Stan Huckaby

Signed and sworn to before me
this 25 day of July, 1989.


Notary Public
My Commission Expires:

DEBORAH A. WEBB
My Commission Expires
October 21, 1989

Commissioned as:



93043500906

BEFORE THE FEDERAL ELECTION COMMISSION

City of Alexandria)
)
County of Arlington) MUR 2767

AFFIDAVIT OF CECI COLE MCINTURFF

CECI COLE MCINTURFF, being first duly sworn, deposes and says:

1. I am Ceci Cole McInturff. I served as Director for National Voter Coalitions for Bush-Quayle 88, Inc., the general election campaign committee ("Campaign" or "Committee") of Republican Presidential candidate George Bush and Vice Presidential candidate Dan Quayle.

2. As Director for National Voter Coalitions, I was the official responsible for authorizing expenditures which were budgeted by the Campaign to this Division. I designated my Executive Assistant, Elizabeth Valega, to sign the required budgetary documentation in the event of my absence. However, to my recollection, Ms. Valega was never called on to sign any documentation. Rather, I authorized each expenditure made by the Coalitions. Without my written authorization no Coalitions expenditures could be made, as the staff of my division were well aware.

3. In order to clarify the National Voter Coalitions program for Bush-Quayle 88 as described in my Affidavit of December 9, 1988 before the Federal Election Commission in

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MUR 2757, let me explain the distinction between the National Voter Coalitions for Bush-Quayle, and the coalitions formed by volunteers on behalf of Bush Quayle. The National Voter Coalitions Office was a division of the Bush-Quayle 88 campaign organization, and consisted of Bush-Quayle 88 paid staff and volunteers, whose job was to encourage volunteer groups which constituted the actual coalitions.

The National Voter Coalitions division of the campaign had its own budget with which it undertook the following activities: 1) Distributed Press releases for publicity purposes regarding the formation of volunteer national coalition steering committees; 2) Acted as a liaison to answer coalition-related questions from volunteer national coalition leaders and the public generally; 3) Encouraged individuals to contact their state's local Bush-Quayle 88 headquarters before undertaking any activity on behalf of the Bush-Quayle 88 Campaign; 4) Issued weekly mailings to the volunteer national coalition leaders, containing information regarding the activities of the Campaign, reprints of positive articles on the Campaign, and guidelines encouraging them to volunteer their time for Bush-Quayle 88 on a local level, register people to vote, and to try to generate local press within their specific coalition community by writing either editorial pieces or op-ed pieces for publication in their local or ethnic newspapers. This weekly mailing program also included a specific memo informing weekly

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mailing recipients that they were prohibited from raising funds on behalf of Bush-Quayle 88 and that they should undertake no organizational activity on the Campaign's behalf without first checking with the state Bush-Quayle 88 leaders;

5) In specific cases, the Office of National Voter Coalitions paid from its limited budget for a speaking tour for surrogate speakers (for the women's coalition only); 6) The Office of National Voter Coalitions also paid for and directly placed newspaper advertisements in selected local ethnic newspapers urging readers to vote for Bush. None of these advertisements dealt with specific coalition organizational activity; 7) The Office of National Voter Coalitions also sent a handful of editorials by George Bush to ethnic newspapers and requested that those newspapers print the editorials on a voluntary basis. The only way which the Office of National Voter Coalitions knew whether or not these editorials had been printed was by asking the weekly mailing recipients to forward copies of editorials which did appear in their ethnic newspapers.

At the state level, volunteer coalition leaders and steering committee members were chosen only by Bush-Quayle 88 state campaign officials. As these volunteer state coalition leaders were chosen, their names were forwarded by Bush-Quayle 88 state campaign officials to the Office of National Voter Coalitions and added to the weekly mailing list.

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4. Both national coalition leaders (chosen by the Office of National Voter Coalitions) and state coalition leaders (chosen only be state Bush-Quayle 88 officials) agreed to be publicly identified as supporters of George Bush, period. Each individual coalition had no specific charter, and no access to financial support from Bush-Quayle 88 or its Office of National Voter Coalitions beyond the aforementioned weekly mailings, surrogate speaking tour (women only) newspaper advertisements (which were placed only for ethnic coalitions). Most importantly, the individual coalitions of volunteers had no spending authority on behalf of Bush-Quayle 88, and they had no authority to raise or spend funds. Rather, the individual coalitions were comprised solely of volunteers, and those volunteers were encouraged to participate in activities such as writing Op-Ed pieces and Letters-To-The-Editor of local and specialty media. Each coalition leader received a Coalition Handbook which provided guidance as to permissible activities which could be undertaken by the coalitions.

5. I am unaware of what relationship, if any, Charles Zogby, a volunteer in the National Voter Coalition division offices of Bush-Quayle 88 in Washington, had with Greek Americans for Bush.

6. In general, volunteers such as Mr. Zogby were engaged in activities such as compiling lists and phone work. To my knowledge, Mr. Zogby was not reimbursed for expenses,

and this would be because he was not authorized to incur any expenses. I do believe, however, that he may have received some nominal amount of money for parking as did many campaign employees and volunteers working in the national headquarters in downtown Washington, D.C.

7. I do not know of any documents which refer or in any way relate to communications between Mr. Zogby and Bush-Quayle 88. In addition, I do not know of any documents which relate to Mr. Zogby's relationship with and/or activities on behalf of Bush-Quayle 88. Any of my communications with Mr. Zogby were along the lines of: "Thanks for your help, and keep working hard."

8. As I attested in my Affidavit of December 21, 1988 before the Federal Election Commission in MUR 2767, volunteers did not participate in any staff meetings. Thus, while I did have weekly staff meetings, Mr. Zogby did not attend. His direct meeting and working contact at the Campaign was with his direct supervisor, Mark Holman.

9. Prior to examining the document which the Commission forwarded to the Bush-Quayle 88 Committee for review, I had no knowledge of any group called Arab American Supporters for George Bush. Further, I had not previously seen this document. This group was not an officially-recognized coalition, and to my knowledge was not in any way related to Bush-Quayle 88, Inc. or the Bush-Quayle Coalition of American Nationalities.

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10. Neither I, nor Bush-Quayle 88 to my knowledge, had any relationship with the Arab-American Republican Federation ("AARF")

11. Finally, I am familiar with Interrogatory number 8 issued to Stan Huckaby, as Treasurer of Bush-Quayle 88, which requests the Committee to produce copies of all documents that relate to the Committee's relationship with AARF or Greek Americans for Bush. I have no such documents.

Ceci Cole McInturff
Ceci Cole McInturff

Signed and sworn to before me
this 25th day of July, 1989.

Viola E. Miller
Notary Public

My Commission Expires: January 18, 1992

93043500912

BEFORE THE FEDERAL ELECTION COMMISSION

City of Washington)
District of Columbia) MUR 2767

AFFIDAVIT OF MARK HOLMAN

MARK HOLMAN, being first duly sworn, deposes and says:

1. I am Mark Holman. I served as Deputy Director, National Voter Coalitions for Bush-Quayle 88, Inc., the general election campaign committee ("Campaign" or "Committee") of Republican Presidential candidate George Bush and Vice Presidential candidate Dan Quayle.

2. Greek Americans for Bush was one of seventeen or eighteen ethnic coalitions of volunteers formed with the assistance of Bush-Quayle 88. Each of these coalitions was a subdivision of the formal coalition of volunteers entitled Coalition of American Nationalities. Bush-Quayle 88 issued two press releases, one on October 5, 1988, and one on October 14, 1988, with regard to the formation of "Greek Americans for Bush-Quayle '88." In addition, coalition chairmen, who were each volunteers, were sent a Bush-Quayle 88 National Coalition Leaders Manual and weekly mailings during approximately the last six to eight weeks of the campaign which provided updates about the campaign and the candidates. Included in these mailings was at least one specific memorandum regarding Do's and Don'ts of the

Coalitions including explicit information with regard to the prohibitions on fundraising.

3. The Bush-Quayle 88 National Voter Coalitions, (as opposed to the 17 or 18 ethnic Coalitions of Volunteers) was a division of the Bush-Quayle campaign and was run from Campaign headquarters. The Bush-Quayle National Voter Coalitions was allocated a share of the Campaign's overall budget. From this budget, the division was allocated approximately \$10,000 by the campaign to place advertisements in ethnic newspapers. These campaign funds were used to target certain nationality newspapers. In fact, approximately 25 advertisements were placed in those newspapers. The Bush-Quayle 88 National Voter Coalitions division did not place any advertisements in Greek American publications.

4. Another manner by which the National Voter Coalition division of the campaign attempted to generate press coverage was by sending a weekly column directly to nationality newspapers around the country and requesting that they consider publishing the column. Four or five such columns were distributed. The National Voter Coalitions division did not pay for the publication of such columns as it had with the advertisements described above, but relied on the decision of the newspapers as to whether or not to print the column. The Bush-Quayle 88 National Voter Coalitions office then asked individual volunteers to send the Campaign copies

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of these columns which they had read in their local or ethnic newspapers.

5. No individual volunteer coalition, including Greek Americans for Bush-Quayle '88, had a budget of its own. The volunteer coalitions were designed solely for volunteer activity.

6. At no time did the Bush-Quayle National Voter Coalitions office recommend or suggest that a volunteer coalition place advertisements in newspapers. Rather, the National Voter Coalitions Office recommended that the volunteer staffers and leaders of the individual volunteer coalitions, such as Greek Americans for Bush, write editorials and op-ed pieces for publication. As with the weekly columns, these editorials and op-ed pieces were published at the discretion of the individual newspapers. It was in this manner that coalition volunteers were to generate press for George Bush.

7. Bush-Quayle 88 produced a graphic letterhead for only a limited number of the volunteer Coalitions, and generally upon their direct request. Greek Americans for Bush was one of the coalitions which requested such letterhead, and received at the most, 150 sheets of letterhead. This letterhead was to be used only to encourage others to volunteer their time for the campaign. Coalition leaders were told specifically in writing that they could not engage in fundraising on behalf of Bush-Quayle 88. Charles

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Zogby, a volunteer working in our offices, would have been the individual who sent the letterhead to Mr. Chirgotis.

8. The Campaign believed that the volunteer coalitions were following the restrictions and guidance given them with regard to what was and was not permissible activity by volunteer coalitions. The Campaign, therefore, had absolutely no input or awareness prior to its distribution of the copy and content of the letter sent out on Bush-Quayle 88 Coalition of American Nationalities letterhead and signed by William G. Chirgotis.

9. I did not see the letter signed by William Chirgotis at issue in this matter until the Campaign received a copy of the complaint filed with the Federal Election Commission.

10. Mr. Zogby was responsible primarily for drafting the weekly informational mailing (see ¶ 2 above), in addition to miscellaneous campaign related activities assigned by me.

11. Mr. Zogby's name would have appeared on the campaign's phone directory as well as on a directory of the National Office of Voter Coalitions. However, I do not know of any documents which relate specifically to communications or the relationship between Mr. Zogby and Bush-Quayle 88. Mr. Zogby was in the office on a regular basis and our conversations involved the daily activities of the National Voter Coalitions of Bush-Quayle 88.

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12. I met with the Ethnic Staff of the Coalitions division of Bush-Quayle 88 on a daily basis to informally discuss the progress of our campaign plan. To my knowledge, Mr. Zogby was not involved in any other meetings with staff members, officials, consultants or other agents of Bush-Quayle 88.

13. While the Campaign did have a coalition of Arab Americans which was a organizational subdivision of the Coalition of American Nationalities in the same way Greek Americans for Bush-Quayle '88 was a subdivision of the Coalition of American Nationalities, it was not "Arab American Supporters for George Bush." To my knowledge, there was no relationship between "Arab American Supporters for George Bush" and Bush-Quayle 88, Inc. and the Bush-Quayle Coalition of American Nationalities. I have not seen previously the document labeled Exhibit 1 to the Federal Election Commission's Interrogatories and Document Requests.

14. Further, to my knowledge, Bush-Quayle 88 had no direct relationship with the Arab-American Republican Federation.


Mark Holman

Signed and sworn to before me
this 24th day of July, 1989.


Notary Public

My Commission Expires: My Commission Expires Aug. 31, 1991

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06C 3568

J. N. PARKER

RECEIVED
FEDERAL ELECTION
OFFICE SERVICE

89 JUL 27 P 12:24

1100 CONNECTICUT AVENUE, N.W., WASHINGTON, D.C. 20036-4101

Keith V. Morgan, Esquire
Federal Election Commission
Room 657
Washington, D.C. 20463

Re: MUR 2767
Greek Americans for Bush

Dear Mr. Morgan:

The answers to the interrogatories propounded to William G. Chirgotis are attached. Mr. Chirgotis mailed to me on July 25th a package of material in the general course of mail with a return receipt, which as of this moment, Wednesday, July 26th, I have not received. It contains the documents which I will be pleased to present and upon receipt of this facsimile, I look forward to your telephone call regarding the deposition date.

Trusting you find this material in order, I am

Sincerely,


John N. Parker

Enclosure

RECEIVED
FEDERAL ELECTION COMMISSION

89 JUL 27 PM 1:27

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BEFORE THE FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

Answers to Interrogatories:
Dukakis/Bentsen Committee, Inc.

MUR No. 2767

Respondent:
William G. Chirgotis

COMES NOW, William G. Chirgotis, respondent by counsel and for answers to the interrogatories propounded in the above entitled cause answers as follows:

1.
 - a. Letters were sent during the last week of September and the first part of October; preparation was made in my office, and postage was paid by myself.
 - b. Total received including a \$1,000.00 personal contribution was \$6,425.00.
 - c. John N. Parker, Theodore Perros, Charles Zogby.
 - d. The National State Bank, Springfield, New Jersey, Account Number: 0200-471-126, The Greek Americans for Bush-Quayle.
 - e. To place advertisements in Greek-American newspapers.
2. Advertisements were placed in the following Greek-American publications and were paid for by the Committee.
 1. NEA YOPKH Magazine, October, 1988
 2. Hellenic Chronicle, Boston, Massachusetts, October 27, 1988
 3. Hellenic Pilgrimage, Tarreytown, New York, November 1, 1988
 4. The Hellenic Journal, San Francisco, October 27, 1988
 5. Hellenic Times, New York, October 19, 1988 and October 25, 1988
3.
 - a. Charles Zogby, National Voter Coalitions
 - b. Arranged for the printing of the letterhead for the committee.

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c. General discussion of the ads the committee was to place in the Greek-American newspapers.

4. William G. Chirgotis

5. I mailed to my counsel on July 25th by regular mail all of my records, cancelled checks and whatever correspondence exists concerning Greek-Americans for Bush.

WILLIAM G. CHIRGOTIS


By Counsel John N. Parker

CERTIFICATE OF MAILING

I certify that I have this 26 day of July placed in the U.S. mail the foregoing answers.


John N. Parker

93043500920

J. N. PARKER

6613571
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE

89 JUL 27 PM 4:48

1100 CONNECTICUT AVENUE, N.W. WASHINGTON, D.C. 20036-4101

July 27, 1989

Keith V. Morgan, Esquire
Federal Election Commission
999 E Street, N.W.
Room 657
Washington, D.C. 20463

11UR 2507

Dear Mr. Morgan:

Per our conversation, attached are the documents required by the subpoena. I'm furnishing you with the originals of the advertising and request that you keep them for the deposition.

This will also confirm the deposition of Mr. Chirgotis will be taken on August 7th at 10 a.m. in your office.

Thank you.

Sincerely,


John N. Parker, Esquire

Enclosures

93043500921

HELLENIC TIMES
265 West 87th St.
NEW YORK, NY 10024

(212) 986-6881

Greek Americans for Bush/Quayle
c/o William G. Chirgotis
37 Mountain Ave
Springfield, NJ 07081

DATE

10/20/88

ACCOUNT NUMBER

AMOUNT ENCLOSED \$

RETURN THIS PORTION WITH PAYMENT

CHARGES AND CREDITS

AMOUNT

Issue 10/19/88

Full Page Ad

Greek Americans for Bush/Quayle

\$600.00

11/1/88

600.00

1200.00

SEE LETTER
ATTACHED

Thank you

PAY LAST AMOUNT
IN THIS COLUMN

HELLENIC TIMES

Bush 88 Quayle

Greeks
for
**BUSH
QUAYLE**

HONORARY CHAIRMEN

The Honorable Michael Bilirakis
Member of Congress
1530 Longworth House Office Bldg.
Washington, D.C. 20515

The Honorable George Gekas
Member of Congress
1519 Longworth House Office Bldg.
Washington, D.C. 20515

William F. Taveleross
Retired President and CEO
Mobil Corporation
171 Harbor Road
Sands Point, N.Y. 11050

The Honorable Olympia Snowe
Member of Congress
2464 Rayburn House Office Bldg.
Washington, D.C. 20515

CO-CHAIRMEN

The Honorable Adeline Geo-Karis
State Senator
2800 Sheridan Rd.
Zion, IL 60699

John R. Markov, Esq.
1100 Connecticut Ave. N.W.
Washington, D.C. 20036

Dr. John Skandalakis
4197 Beechwood Drive, N.W.
Atlanta, Ga. 30309

Alec F. Courtalis
1101 Brickell Avenue
Miami, FL 33131

Dr. Theodore Perros
500 23rd St., N.W.
Washington, D.C. 20037

A MESSAGE FOR AMERICANS OF GREEK HERITAGE

In a few weeks, Americans will go to the polls to elect the next President of the United States. Each of us bears the duty of evaluating the positions taken by the two candidates, George Bush and Michael Dukakis, on the issues with which this nation is confronted and to reflect upon the merits of their respective proposals for dealing with them. Who has the greatest range of experiences at all levels of public service? Who possesses those personal values to which we can relate most comfortably? Who is best equipped to carry on as our next President of the United States?

We, the undersigned Americans of Greek descent, and proud of it, have publicly endorsed George Bush for the presidency of the United States. We earnestly seek the support of all Hellenes for the following reasons:

- 1) For the past eight years, America has experienced the longest sustained period of economic growth in its history.
- 2) Its military has emerged from a position of decline and partial obsolescence in equipment to a highly respected and professional force second to none.
- 3) The recently signed treaty with the Soviet Union leading to the mutual destruction of a class of nuclear weapons is a major step in reducing the threat of a nuclear war.
- 4) The departure of the Russian military forces from Afghanistan, the cease fire agreement in the Iran-Iraq war, the termination of hostilities in Angola, and the commencement of discussions between Cyprus and Turkey, are examples of a new era of negotiations rather than conflicts for the settlement of regional disputes.
- 5) The rescue of American students by our military forces in Grenada, and the attack of Libya by the United States in response to terrorist acts against Americans, announced to the world that America would respond militarily to protect its self-interests.

George Bush, a loyal Vice-President to President Reagan for the past eight years, has the experience, the knowledge and the determination to serve this nation as its leader. He is best equipped for this vital role. We urge you to vote for George Bush for President of the United States.

"As an American of Greek descent I am honored and very proud to endorse the candidacy of Vice-President George Bush for the Presidency of the United States.

"I believe that his qualifications, such as extensive experience in domestic and foreign affairs, together with his progressive ideas and programs for the future of this country, will provide the proper leadership and the continuity that is necessary to perpetuate the economic stability we have enjoyed during the past eight years under the Reagan administration.

"Through the years, his many varied, distinguished

and dedicated services to our country certainly qualify him for active support in his bid for the Presidency. He has always been very responsive to the ethnic concerns of Greek-Americans and the protection of minority rights for all people.

"Perhaps many of us of Hellenic origin are proud to see one of our heritage become President of the United States; but I believe that ethnicity is not a good reason to support a candidate for any office, especially that of President of the United States."

WILLIAM G. CHIRGOTIS
NATIONAL CHAIRMAN
37 Mountain Avenue
Springfield, NJ 07081



Vice President George Bush

The Hellenic Chronicle

America's Largest Newspaper
for Greek Americans

10/27/88



324 Newbury Street
Boston, Massachusetts 02115
Telephone [617] 262-4500

William G. Chirgotis
Greek-Americans for Bush Quayle
37 Mountain Ave.
Springfield, NJ 07081-1787

(Detach and mail this stub with your remittance)

THE HELLENIC CHRONICLE • 324 NEWBURY STREET • BOSTON, MASS. 02115

8 6ts

Oct. 27 issue

advertising 6c x 10 1/2" @14.50 pci 913.50

Paul

93043500924

Bush 88 Quayle

POLITICAL ADVERTISEMENT

HONORARY CHAIRMEN

The Honorable Michael Bilirakis
Member of Congress
1530 Longworth House Office Bldg.
Washington, D.C. 20515

The Honorable George Gekas
Member of Congress
1519 Longworth House Office Bldg.
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for
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QUAYLE**

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1101 Brickell Avenue
Miami, Fl. 33131

Dr. Theodore Perros
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Washington, D.C. 20037

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The Hellenic Journal

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THE GREEK STAR



The Voice of Chicago's Hellenic Community

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17 Fountain Avenue
Springfield, IL 62781

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4710 N. Lincoln Avenue

Mr. William G. Chirgotis
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Paul
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Bush 88 Quayle



GREEKS
for
BUSH
QUAYLE
88

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**Dukakis and Bush speak
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Exclusive interviews
PAGE 5

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NEW YORK Greek-American Monthly Review



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Governor Dukakis

George Bush for President

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10312 Conover Dr.
Silver Spring, Md. 20904

George Chimples \$ 100.00
5909 West 130th St.
Parma, Ohio 44130

Miss E. Batalis \$ 50.00
249 Linden St.
Manchester, N.H. 03104

Al Marland \$ 100.00
736 Brooke Rd.
Wayne, Pa. 19087

Mrs. A. Athas \$ 25.00
519 H Street
Salt Lake City, Ut. 84103

93043500942

Ken C. Jones
(no address) \$ 50.00

John Deoudes \$ 200.00
5801 Lenox Rd.
Bethesda, Md. 20817

Plato Truman \$ 100.00
9 Thornton St.
Biddeford, Me. 04005

Julie Fotiades \$ 50.00
1631 Valmont St.
New Orleans, La. 70115

John N. Polydouris \$ 100.00
272 Western Ave.
Albany, N.Y. 12203

Harry Magafan \$ 100.00
6109 Clearwood Rd.
Bethesda, Md. 20817

Eugene T. Rossides \$ 100.00
3666 Upton St. N.W.
Washington, D.C. 20008

Dimitrios Kaloidis \$ 500.00
% George K. Leontarakis
P.O. Box 653
"Captain G's"
Woodbridge, N.J. 07095

Harry Pappachristus \$ 100.00
685 Columbus Ave.
Perth Amboy, N.J. 08861

DFL Excavating & Const. Inc. \$ 500.00
179 Wilson Rd.
Somerset, N.J. 08873

Fish & Fish Distributors \$ 100.00
375 Herbert St.
Perth Amboy, N.J. 08861

93043500943

George K. Leontarakis
P.O. Box 653
"Captain G's"
Woodbridge, N.J. 07095

\$1,000.00

Brothers Management Asso.
141 Dunbar Ave.
Fords, N.J. 08863

\$ 100.00

Peter Pappas Produce
10 Dana Estates Dr.
Parlin, N.J. 08859

\$ 100.00

M.J. Lieberman & Co.
354 Eisenhower Parkway
Livingston, N.J. 07039

\$ 250.00

M. Schacht Seafood
126 Brunswick St.
Jersey City, N.J. 07302

\$ 100.00

\$6,425.00 TOTAL

93043500944

WILLIAM G. CHIRGOTIS
ARCHITECT

37 MOUNTAIN AVENUE • SPRINGFIELD, NEW JERSEY 07081-1787 • 376-3200

GREEK-AMERICANS FOR BUSH-QUAYLE

Total Receipts Deposited

\$ 1,500.00
1,300.00
550.00
225.00
2,850.00

\$ 6,425.00

Paid Outs

\$ 600.00	Hellenic Journal
550.00	Greek Star
720.00	Greek Sunday News
913.50	Hellenic Chronicle
2,400.00	H. Nea Yopkh
1,200.00	Hellenic Times
<hr/>	
\$6,383.50	Total
4.73	Bank Service Charge
<hr/>	
\$6,388.23	
\$ 36.77	BALANCE

Accounts Due & Payable
Professional services rendered

Carol A. Roessner
15 Alvin Terrace
Springfield, N.J. 07081

Professional services rendered for secretarial work
performed -----\$425.00

National Home Planning Service
37 Mountain Avenue
Springfield, N.J. 07081

Art work, photocopying, mimeographing, postage
telephone, etc. -----\$560.00

93043500945

10.12.88

Mr. Chirgotis -

Here's 250 pieces of Greek American
Committee letterhead with envelopes.

Sorry for the delay in getting this
to you - problems with volunteers.

If you need any more materials
please don't hesitate to call

Charles Zogby


Bush 88 Quayle

Charles Zogby
National Voter Coalitions

733 15th St., N.W.
Washington, D.C. 20005

(202) 624-8601 ext. 5029
T.D.D. (202) 393-6471

WILEY, REIN & FIELDING

1775 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

December 2, 1988

WRITER'S DIRECT DIAL NUMBER

(202) 429-7366

Mr. William G. Chirgotis
37 Mountain Avenue
Springfield, New Jersey 07081

Dear Mr. Chirgotis:

Thank you for your letter and enclosed materials detailing activities of the Greek Americans for Bush Coalition during the election which are the subject of MUR 2757.

As I informed you on the telephone, these activities were not authorized by Bush-Quayle 88. In fact, every Coalition was expressly forbidden to expend any funds without approval of the appropriate campaign budget officers, and no one associated with Bush-Quayle 88 had any authority to seek or accept contributions. In that regard, I refer you specifically to the memo of October 12, 1988 from Ceci Cole McInturff to all Coalition Directors. Accordingly, the Treasurer of Bush-Quayle 88 has determined that the Campaign will not pay for any unauthorized disbursements, and will not reimburse any agents of the Campaign for any expenditures they may have made in violation of express campaign instructions.

Accordingly, I am returning to you all of the bank statements, advertisements, bills, invoices, correspondence, etc. which you forwarded to me concerning your fundraising activities and expenditures.

Should you have any further questions concerning the parition of Bush-Quayle 88 in this matter, please do not hesitate to phone.

Sincerely,


Trevor Potter

TP/co
Enclosures

93043500947

WILLIAM G. CHIRGOTIS
ARCHITECT

37 MOUNTAIN AVENUE • SPRINGFIELD, NEW JERSEY 07081-1787 • 376-3200

November 28, 1988

Wiley, Rein & Fielding
1776 K Street N.W.
Washington, D.C. 20006

Att: Mr. Trevor Potter

RE: Greek-Americans
for Bush Campaign

Dear Mr. Potter:-

Enclosed herewith find copy of the "Bush-Quayle" advertisement that appears on Page 4, of the November 1st, 1988, issue of the "Pilgrimage", including the unpaid bill in the amount of \$800.00.

This makes a final totaling of outstanding unpaid bills to be paid in the amount of \$1,785.00.

Sincerely,


William G. Chirgotis

WILEY, REIN & FIELDING

1775 K STREET, N. W.
WASHINGTON, D. C. 20006
(202) 429-7000

JAN W. BARAN
(202) 429-7330

November 14, 1988

TELECOPIER
(202) 429-7049
TELEX 248349 WYRN UR

Mr. William Chirgotis
37 Mountain Avenue
Springfield, New Jersey 07081

Federal Express

Dear Mr. Chirgotis:

Attached is a letter from the Federal Election Commission addressed to you at 733 15th Street, N.W., Washington, D.C. 20005, enclosing a complaint filed by the Dukakis/Bentsen Committee, Inc. naming you among others as a respondent.

Please call me or Trevor Potter of my office regarding this matter at your earliest convenience.

Sincerely,



Jan W. Baran
General Counsel
Bush-Quayle 88

Attachment

93043500949

WILLIAM G. CHIRGOTIS
ARCHITECT

37 MOUNTAIN AVENUE • SPRINGFIELD, NEW JERSEY 07081-1787 • 376/3200

November 21, 1988

Wiley, Rein & Fielding
1776 K Street N.W.
Washington, D.C. 20006

Att: Mr. Trevor Potter

RE: Greek-Americans
for Bush Campaign

Dear Mr. Potter:-

In accordance with our recent conversation, I am enclosing herewith the following.

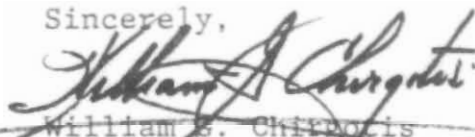
1. Bank statement with our total deposits, and the only bank statement I have received to-date
2. Itemized list of all contributors and amount contributed.
3. Outstanding payable accounts, totaling \$985.00 have not been paid because of insufficient funds.
4. Copies of all paid bills and illustrations of the advertising that appeared in each of the six publications.

It is my understanding that you propose to refund the money collected to each contributor, and take care of the two outstanding unpaid bills

In view of the fact, that almost all of the contributors are personal friends, it would be appreciated if you would send me a copy of the letter of explanation, for review, before it is mailed out to them.

If there is any other information you need, please do not hesitate to call me, anytime after Monday, November 28th, as I expect to be out of the office until that time.

Sincerely,


William G. Chirgotis

93043500950



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 28, 1989

J. N. Parker, Esquire
1100 Connecticut Avenue, N.W.
Washington, D.C. 20036-4101

RE: MUR 2767
Greek Americans for Bush

Dear Mr. Parker:

This is in response to your July 27, 1989, request that the deposition of Mr. William Chirgotis, presently noticed for August 2, 1989, be postponed until August 7, 1989. After considering the circumstances you described to Keith Morgan, I have granted the requested postponement. Accordingly, the deposition will be taken on August 7, 1989 at 10:00 a.m.

Please confirm your clients availability for August 7, 1989 with Keith Morgan, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY:


Lois G. Lerner
Associate General Counsel

93043500951



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1989

Richard Mayberry, Esquire
Richard Mayberry & Associates
Fifth Floor
888 16th Street, N.W.
Washington, D.C. 20006

RE: MUR 2767
Arab-American
Republican Federation

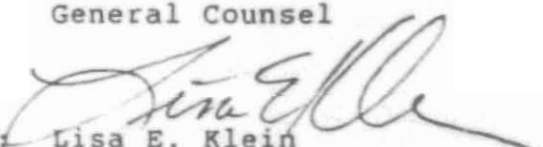
Dear Mr. Mayberry:

This is to confirm our agreement to postpone Charles Zogby's deposition, presently noticed for August 4, 1989, until August 9, 1989 at 10:00 a.m.

Thank you for agreeing to this change. If you have any questions, please contact Keith V. Morgan, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel


BY: Lisa E. Klein
Assistant General Counsel

93043500952

ACE-FEDERAL
REPORTERS, INC.

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 SEP 26 AM 11:06

444 North Capitol Street
Washington, D.C. 20001
(202) 347-3700
(800) 336-6646

STENOTYPE REPORTERS

FAX 202/737-3638

19 September 1989

Keith Morgan, Esquire
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20006

Re: Deposition of WILLIAM G. CHIRGOTIS,
Washington, D.C., 7 August 1989

Enclosed is the Original transcript of the above-entitled
deposition, which has been read and signed by the Deponent.
No changes have been noted in this Deposition.

Sincerely,

mc

Edwin G. Crowley
Deposition Supervisor

cc:

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 SEP 26 PM 12:05

93043500953

TRANSCRIPT OF PROCEEDINGS

ORIGINAL

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ELECTION COMMISSION

In the Matter of:

WILLIAM G. CHIRGOTIS

-X
:
:
:
:
:
-X

M U R 2767

DEPOSITION OF WILLIAM G. CHIRGOTIS

Washington, D. C.

Monday, August 7, 1989

ACE-FEDERAL REPORTERS, INC.

Stenotype Reporters

444 North Capitol Street

Washington, D.C. 20001

(202) 347-3700

Nationwide Coverage

800-336-6646

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 SEP 26 PM 12:05

9304350955

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ELECTION COMMISSION

-X
:
In the Matter of: :
:
WILLIAM G. CHIRGOTIS : MUR 2767
:
-Y

Washington, D.C.
Monday, August 7, 1989

DEPOSITION OF WILLIAM G. CHIRGOTIS

Deposition of WILLIAM G. CHIRGOTIS, called for examination by counsel for the Federal Election Commission, pursuant to notice, at the offices of the Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, at 10:40 a.m., before Claire B. Tepper, a Notary Public in and for the District of Columbia, when were present on behalf of the respective parties:

On Behalf of the Federal Election Commission:

KEITH MORGAN, ESQ. and COLLEEN MILLER, ESQ., Attorneys,
Federal Election Commission,
999 E Street, N.W.,
Washington, D.C. 20463.

On Behalf of William G. Chirgotis:

JOHN N. PARKER, ESQ.,
Suite 620,
1100 Connecticut Avenue, N.W.,
Washington, D.C. 20036.

Also Present:

DR. THEODORE PERROS

** ** *

9304350956

C O N T E N T SWITNESSDIRECTCROSS

WILLIAM G. CHIRGOTIS

3

68

E X H I B I T SFEC EXHIBIT NO.IDENTIFIED

1

18

2

34

3

40

4

45

5

48

6

52

7

54

**

**

**

9304350957

CBT/cs 1

P R O C E E D I N G S

2 Whereupon,

3 WILLIAM G. CHIRGOTIS

4 was called as a witness and, having been first duly sworn,
5 was examined and testified as follows:

6 DIRECT EXAMINATION

7 BY MR. MORGAN:

8 Q Good morning. My name is Keith Morgan. Colleen
9 Miller is sitting next to me. Ms. Miller and I represent
10 the Federal Election Commission in this matter.

11 This deposition is being taken pursuant to a
12 Federal Election Commission subpoena issued in connection
13 with an investigation under Section 437-G of Title II of the
14 United States Code. The statute provides that the
15 confidentiality of this investigation must be maintained
16 until the Commission closes its file. The Commission has
17 civil jurisdiction over the Federal Election Campaign Act of
18 1971, as amended.

19 Mr. Chirgotis, are you represented by counsel
20 today?

21 A Yes.

22 Q Could you identify him?

9304350958

CBT/cs

1 A John Parker.

2 Q Speak a little louder, please.

3 A John Parker.

4 Q Thank you. I don't know if you have been deposed
5 before, but in this one I'm going to ask you a series of
6 questions about the facts giving rise to the Matter Under
7 Review 2757.

8 Can you answer yes or no because this is being
9 recorded. Your responses should be verbal and no shaking
10 your head.

11 A Okay.

12 Q If you do not hear a question, say so and I will
13 repeat it. If you don't understand the question, say so and
14 I will rephrase it.

15 A All right.

16 Q If you realize an earlier answer you gave was
17 inaccurate or incomplete, say that you want to correct or
18 supplement your earlier answer. You will be allowed to do
19 so.

20 And if you want to stop to use the restroom or to
21 stretch your legs or get a cup of coffee or a glass of
22 water, you will be allowed to do so. If you find that you

CBT/cs

1 are tired or confused or you want to take a short break or
2 even recess for the day, go ahead and say so.

3 If you don't understand a question, will you tell
4 me you don't understand?

5 A All right.

6 Q If you don't know the answer, will you tell me you
7 don't know it?

8 A All right.

9 Q So we will agree that you will only answer
10 questions you understand and know the answers to.

11 A Right.

12 Q Do you understand the instructions I have just
13 given you?

14 A Yes.

15 Q Will you state your name for the record.

16 A William G. Chirgotis.

17 Q Would you spell your last name.

18 A C-h-i-r-g-o-t-i-s.

19 Q Could you state your present address.

20 A 37 Mountain Avenue, Springfield, New Jersey.

21 Q Your present occupation?

22 A Architect.

CBT/cs

1

Q How old are you?

2

A Seventy-nine.

3

Q Will you describe your educational background.

4

A I went to Central High School and I graduated from

5

Pratt Institute.

6

Q What did you do to prepare for this deposition

7

today?

8

A Nothing.

9

Q Did you talk with your attorney?

10

A Very briefly this morning.

11

Q Did you speak with him in his office this morning?

12

A Yes.

13

Q Did you review any documents before you came here?

14

A No.

15

Q No documents at all?

16

A (Shaking head.)

17

Q Have you been involved with political campaigns

18

prior to 1988?

19

A The Nixon-Agnew campaign.

20

Q In what year?

21

A I don't remember.

22

Q Can you describe your involvement?

CBT/cs

1

A I was just treasurer of the campaign.

2

Q Treasurer of the entire Nixon-Agnew campaign?

3

A Greek American Division.

4

Q So you were chairman of the Greek American

5

Committee of the Nixon-Agnew campaign. You don't recall

6

what year?

7

A I didn't say chairman; I was treasurer.

8

Q Treasurer, I'm sorry. What did you do as

9

treasurer?

10

A Collect funds and disburse them.

11

Q So how did you get involved with the Bush-Quayle

12

campaign?

13

A I just wanted to get involved in it, that was all.

14

Q Who did you talk to to get involved?

15

A Nobody.

16

Q Did someone get in touch with you?

17

A Yes, I got a letter from the Bush Committee

18

inviting me to go to a briefing that they had here at the

19

National Press Club.

20

Q So you came to Washington, D.C.?

21

A Yes.

22

Q When did you get the letter?

CBT/cs

1 A I don't remember the date. It must have been
2 sometime in August.

3 Q August of what year?

4 A '88. What year?

5 Q These campaigns get started early sometimes. When
6 did you come to the Press Club?

7 A When they invited me.

8 Q In 1988?

9 A Yes.

10 Q In August 1988?

11 A Yes.

12 Q Do you remember who invited you, the person?

13 A I got a letter from the committee. I don't
14 remember who signed the letter.

15 Q And who did you meet at the meeting?

16 A There was a lot of people there that I met. Mr.
17 Parker was there and Mr. Perros was there.

18 Q Who was there from the Bush-Quayle campaign?

19 A I don't remember.

20 Q If I said some names -- was Vice President Bush
21 there?

22 A I don't think I can help you because I wouldn't

9304350963

CBT/cs

1 know the names.

2 Q You wouldn't remember the names?

3 A No.

4 Q So what was your involvement with the Bush-Quayle
5 campaign after the August 1988 meeting here?

6 A What do you mean by "my involvement"?

7 Q What did you do?

8 A Nothing.

9 Q After the meeting you didn't do anything at all?

10 A I didn't do a thing until I got a letter.

11 Q Who did you get a letter from?

12 A I got a letter from -- I got a letter from the
13 committee, and I also got a letter from George Bush
14 expressing his thanks that I agreed to work for the
15 campaign.16 Q When did you agree? When you came to the National
17 Press Club, is that when you agreed to work for the
18 campaign?19 A No, I did not. This was after I received the
20 letters.21 Q You got a letter from Bush thanking you for being
22 involved in the campaign?

CBT/cs

1

A That's true.

2

Q Prior to that you got another letter?

3

A Yes.

4

Q Who was that from?

5

A I don't remember. It was from the committee.

6

Q From which committee?

7

A Who signed it I don't know. The Bush-Quayle

8

Committee. Who signed the letter I don't know. I don't

9

remember.

10

Q The letter asked you to become involved?

11

A Yes.

12

Q What did they ask you to do?

13

A They said I was chairman of the Greek

14

Nationalities Division. They appointed me chairman.

15

Q Did you ask to be chairman?

16

A No.

17

Q They appointed you chairman?

18

A Yes.

19

Q And do you remember when this was?

20

A No.

21

Q Was it in August 1988?

22

A No, it was much later than that. It was probably

9304350965

CBT/cs

1 sometime around October.

2 Q So in October you became chairman of the Greek
3 Americans?

4 A (Nodding.)

5 Q What was your exact title?

6 A Chairman of the Greek American Nationalities
7 Group.

8 Q Okay. As Chairman of the Greek Americans
9 Nationality Group, what were your duties? What did you do?

10 A Well, primarily it was to raise funds and put ads
11 in the Greek American newspapers.

12 Q How did you go about raising funds?

13 A We sent a circular letter out.

14 Q When did you send the letter out?

15 A Sometime in October.

16 Q How many other ethnic coalitions were there in the
17 Bush-Quayle campaign?

18 A I really don't know.

19 Q Did you ever meet with the other members of the
20 coalition?

21 A No -- except the initial meeting at the National
22 Press Club was the only time I met them. No other time.

9304350966

CBT/cs

Q So at this meeting there were members of all the other ethnic coalitions?

A Yes, there were Jewish, Italians, Israelis.

Q At that meeting did they tell you what your responsibilities were and what they expected --

A They gave us an orientation.

Q What kinds of things did they talk about at the orientation?

A Well, they told us what to do. I can't go into detail and tell you what happened at that time.

Q What was your understanding of what you were supposed to do?

A Well, to try to get as many people to vote for Bush as possible.

Q To make speeches for Bush?

A I didn't make any speeches, no.

Q Did you arrange for other people to make speeches?

A No.

Q Did you write any editorials?

A The ads that appeared in several Greek American newspapers.

Q So you wrote those? You wrote the ads?

9304350967

CBT/cs

1

A Yes.

2

Q Were you reimbursed by Bush-Quayle for any

3

expenses?

4

A No, they told me they didn't have any funds.

5

Q Were you upset by that?

6

A No.

7

Q Did you expect them to reimburse you?

8

A No.

9

Q But you asked them?

10

A Well, I wanted to get some direction as to what we

11

could do.

12

Q Well, when you asked for direction, who did you

13

ask?

14

A Well, there were several people involved at that

15

time, because the committee at that time was completely

16

disorganized. They had a lot of volunteer help, and every

17

time I would call there I'd talk to one person one day and

18

the next time I'd talk to somebody else and the next day I'd

19

talk to somebody else. So finally we were told that the

20

committee did not have any funds to pay for any of the ads,

21

but if we wanted to raise funds for the ads we could do

22

that. That's exactly what I did.

CBT/cs

1 Q Do you remember any of the volunteers' names that
2 you talked to?

3 A Well, I spoke to so many of them. Charles Zogby
4 was one. Leslie Goodman was another one. Eva -- I don't
5 remember her name; I think it was Netawicz -- I think it's
6 spelled N-e-t-a-w-i-c-z or something like that; Andrew
7 Falkanowicz, and perhaps many others. I can't remember all
8 the names.

9 Q Did they give you any feedback on how to raise
10 funds, how to raise money?

11 A No.

12 Q They just said, "Raise funds"?

13 A Yes, they told us we could raise funds to pay for
14 the ads, which is exactly what I did.

15 Q When did you speak to Mr. Zogby?

16 A Oh, I spoke to him maybe a dozen times. He was
17 probably my primary contact, I would say.

18 Q When was the first time you talked to him?

19 A I don't remember.

20 Q September?

21 A No, it had to be the early part of October because
22 he sent me the stationery sometime in the latter part of

CBT/cs

1 October.

2 Q How did you know to get in touch with him?

3 A Well, I had to talk to somebody at the
4 headquarters; right?

5 Q Why did you select him out of all of the --

6 MR. PARKER: Well, his testimony so far has been
7 he didn't select anybody. He was simply calling the
8 headquarters.

9 BY MR. MORGAN:

10 Q When you called the headquarter, did you ask for
11 any particular person?12 A No, I just talked to anybody who answered the
13 telephone.

14 Q And Zogby answered the phone 12 times?

15 A I think we went through that. Zogby would answer
16 or somebody else would have come on the telephone or
17 somebody else. There was no one person that you would call
18 and talk to.

19 Q But you talked to Zogby --

20 A -- many times.

21 Q He was the person you talked to more than anyone?

22 A My primary contact, I would say, was he. In other

CBT/cs

1 words, I spoke to him more often than anybody else.

2 Q What was his title?

3 A I don't know. He sent me the stationery.

4 "National Voter Coalitions, Charles Zogby." This is the
5 letter that he sent (indicating).

6 Q Did you ever meet Mr. Zogby in person?

7 A No.

8 Q When you called, did you ever ask for him after
9 you talked to him?

10 A Oh, I had to, yes.

11 Q Did he have a secretary there, do you recall?

12 A I don't remember. Somebody may have answered the
13 telephone and then referred me to Mr. Zogby. Whether it was
14 a secretary or not, I do not know.

15 Q Do you recall the title of Leslie Goodman?

16 A No.

17 Q Would you ask for Ms. Leslie -- was it male or
18 female?

19 A I do not know.

20 Q But you spoke with this Goodman person?

21 A At some time I did.

22 Q What did you speak about?

CBT/CS

1

A I don't remember.

2

Q Eva Netawicz.

3

A Yes. I spoke to her once, I think.

4

Q What was her title?

5

A I don't remember. You know, when you speak to a

6

person over the telephone, you don't say, "What is your

7

title?" do you?

8

Q When they answer the phone, did they say --

9

A Well, they say, "My name is John Smith."

10

Q Did they say, "John Smith, so and so," title?

11

A No.

12

Q They just gave you the name?

13

A Yes.

14

Q What did you talk about with Ms. Netawicz?

15

A I don't remember.

16

Q Was it about the fund-raising effort?

17

A Obviously it had to be about the fund-raising.

18

The details I don't remember.

19

Q Andrew Falkanowicz? Do you recall his title?

20

A No.

21

Q How many times did you talk to him?

22

A Once. You asked me that question before. How

CBT/cs

1 come you ask me the same question?

2 Q I'm going to ask you about each individual.

3 A Go ahead.

4 Q You talked about Zogby. Do you recall any other
5 names?

6 A No.

7 Q Did you receive any correspondence other than the
8 letter you pointed out from Mr. Zogby?

9 A I may have received other correspondence, yes.

10 Q What did they contain?

11 A I don't remember.

12 MR. MORGAN: I am going to ask the reporter to
13 mark this FEC Exhibit 1, and I'm going to give a copy of FEC
14 No. 1 to Mr. Chirgotis and his attorney, Mr. Parker.15 (The document referred to was
16 marked for identification as
17 FEC Exhibit No. 1.)

18 BY MR. MORGAN:

19 Q Would you identify FEC Exhibit 1 for the record.

20 A This one here?

21 Q Yes.

22 A Yes.

CBT/cs

1

Q Would you state what it is.

2

A It's a letter that was sent out to a mailing list

3

that we had accumulated to solicit funds.

4

Q Where did you get the mailing list?

5

A By word of mouth. These were actually personal

6

friends. I got some from people I would call up and I had

7

some friends that I knew of, and we sent these letters out.

8

Q Did any of the names come from Bush-Quayle?

9

A No.

10

Q Just from personal friends?

11

A (Nodding.)

12

Q Any other sources?

13

A No.

14

Q Is that your signature at the bottom?

15

A That's mine.

16

Q How many people received the letter?

17

A I think about 70 or 80. That's all we had on our

18

mailing list.

19

Q There's no date at the top of this, so when was

20

the letter mailed out?

21

A Well, obviously this letter was mailed out after

22

we received the stationery from Mr. Zogby, and his letter is

CBT/cs

1 dated -- what? -- October 12. So this probably went out
2 maybe a week or 10 days later.

3 MR. MORGAN: Let the record reflect that Mr.
4 Chirgotis is referring to an October 12, 1988, letter to Mr.
5 Chirgotis from Charles Zogby at the Bush-Quayle
6 headquarters.

7 BY MR. MORGAN:

8 Q Whose idea was it to send out the letter?

9 A Mine.

10 Q Anyone else's?

11 A No.

12 Q Did the Bush-Quayle people want you to send out
13 the letter?

14 A Oh, I don't know.

15 Q When you talked to them -- you talked to Zogby
16 those 12 times and you talked to the two other people there
17 -- did you discuss with them the letter?

18 A They told us we could make every effort we could
19 to solicit funds.

20 Q Did you think they approved of the letter?

21 A I don't know.

22 Q Do you think they thought it was a good idea for

9304350975

CBT/cs

1 you to send out letters?

2 A I don't know.

3 Q But they told you to fund-raise?

4 A Yes, to raise money and pay for the ads that we
5 put in local newspapers.

6 Q So you --

7 MR. PARKER: Counsel, I don't like to interrupt,
8 but the point that was made was that he was told there was
9 no money, that Bush-Quayle had no money to pay for ads, and
10 if he undertook to raise money to pay -- because the idea
11 was to place ads in those six papers. And I think that's
12 what we covered.

13 BY MR. MORGAN:

14 Q Mr. Chirgotis you testified you spoke several
15 times with several individuals at the Bush-Quayle
16 headquarters.

17 A Yes.

18 Q During the time you were preparing this letter, I
19 just want to know if they knew of this specific activity.

20 A No. How would they know?

21 Q During the telephone conversations?

22 A No.

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CBT/cs

1

Q Who wrote the text of this letter?

2

A This was an abstract, so to speak, from some of

3

the literature they sent me. In other words, if we were to

4

go out and make speeches, they gave you guidelines as to

5

what to say and what to do, so I put that stuff together and

6

signed it and mailed it out.

7

Q So the information was sent to you as chairman of

8

Greek Americans?

9

A Yes.

10

Q Would you look at the mailing. Which part of it

11

did you fill in and which part of it --

12

A I couldn't tell you.

13

Q You recognize the letter?

14

A Yes.

15

Q Did you request this information from Bush-Quayle?

16

A No, they sent that information to everybody. This

17

is the literature they sent to everybody.

18

Q I didn't get any.

19

A Well when I say "everybody" --

20

MR. PARKER: Were you on the campaign?

21

THE WITNESS: -- there's different coalitions. In

22

other words, they probably sent it to the chairman of the

9304350977

CBT/cs

1 Jewish campaign, the Israeli campaign, the Italian campaign.
2 They mailed the stuff out to everybody. I didn't solicit
3 this information.

4 BY MR. MORGAN:

5 Q How much stuff did you get from them?

6 A Oh, tons of stuff. They gave us forms of
7 speeches. In other words, if you were to go out and make a
8 speech, they would tell you what to say, what Bush did, what
9 this guy did, and the other guy did.

10 Q So every day you'd get something?

11 A Well, not every day but regularly.

12 Q Once a week? A few times a week?

13 A (No response.)

14 Q Did anyone else participate in the preparation?

15 A No.

16 Q Did anyone else review it before you sent it out?

17 A No.

18 Q Did you type the letter?

19 A I didn't type it. My secretary typed it.

20 Q Would you state her name for the record.

21 A He asked did I type the letter. It's

22 unbelievable, some of these questions. Counsel, these

9304350978

CBT/cs

1 questions you're asking -- pardon me for saying these things
2 -- they're so damn stupid. You're asking me if I typed the
3 letter? I've got a secretary. Why don't you ask me
4 questions pertaining to this?

5 BY MR. MORGAN:

6 Q Well, what do you want to say about this letter?

7 A Nothing.

8 Q I'm asking you how it was prepared.

9 A I told you I prepared it and mailed it out --
10 period, that's it.

11 Q Someone typed it.

12 A My secretary typed it.

13 Q Thank you. How did you obtain the letterhead that
14 you used for mailing?

15 A You asked me that question before. Mr. Zogby sent
16 it to me. Here's the letter. He sent me the stationery;
17 okay? Don't repeat your questions. You make me feel
18 stupid.

19 MR. MORGAN: Off the record.

20 (Discussion off the record.)

21 MR. MORGAN: Back on the record.

22

CBT/cs

1

BY MR. MORGAN:

2

Q Now, Mr. Chirgotis, where did you obtain the

3

letterhead for this mailing?

4

MR. PARKER: That question has been asked and

5

answered.

6

THE WITNESS: That question has been answered.

7

MR. PARKER: Wait a minute. The witness stated he

8

received the letterhead from Mr. Charles Zogby --

9

THE WITNESS: You saw that; you made a record of

10

it.

11

MR. PARKER: -- whose letter is in his own

12

handwriting, apparently, dated October 12, '88, and mailed

13

to Springfield to his office.

14

BY MR. MORGAN:

15

Q You obtained the letterhead from Mr. Charles

16

Zogby?

17

A Yes.

18

Q Did you request the letterhead from Mr. Zogby?

19

A No.

20

Q Why did you receive it?

21

A He mailed it to me. He shipped it to me.

22

Q Unsolicited?

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CBT/cs

1

A Unsolicited.

2

Q Did you regularly use the Bush letterhead for

3

other mailings?

4

A No.

5

Q You received this without solicitation and since

6

you had it you just used it?

7

A Yes.

8

Q Describe what you did with the other letterhead

9

that you had received?

10

A What other letterhead? I only received one

11

letterhead.

12

Q For what purpose?

13

A To do whatever I wanted to with it. He didn't

14

tell me what to do with it, but I used it to raise funds.

15

Q Approximately how much money was spent on this

16

fund-raising effort?

17

A Money spent? About \$6,000.

18

Q Approximately how much was spent on printing?

19

A All of it.

20

Q Was any of it spent on postage?

21

A No.

22

MR. PARKER: Would you like to refer to your

CBT/cs

1 record?

2 THE WITNESS: We have a separate item for the
3 postage in here. It's not in there. But we have an
4 itemized list here of all the money that was spent and to
5 what publication it went to.

6 MR. MORGAN: Let the record reflect that the
7 deponent is referring to his response.

8 BY MR. MORGAN:

9 Q How much was spent in preparing the fund-raising
10 letter?

11 A To prepare the letter?

12 Q To prepare the letter.

13 A Typing the letter?

14 Q Typing and printing the letter.

15 A There was a total of \$985 for professional
16 services of preparing the letter, postage, mimeographing,
17 photocopying, art work, and telephone.

18 Q Where did the funds come from to prepare the
19 letter?

20 A From the people that we solicited funds from.

21 Q Was it solicitation before the letter?

22 A No. How could it be before the letter? It was

CBT/cs

1 after we got the letter we sent out for funds. So how could
2 it be before?

3 Q So when you sent out the letter, you didn't have
4 any funds?

5 A No, we didn't.

6 Q So where did you get the money for the printing
7 and the postage to mail out the letters?

8 A As the money came in we paid our bills.

9 Q So you had an account?

10 A I went to the bank and I opened an account. I put
11 \$1,000 in there. There's a breakdown here (indicating).

12 Did you read this letter?

13 Q Yes.

14 A Then why do you ask me the questions?

15 MR. PARKER: It's all broken down here.

16 THE WITNESS: It's all broken down here. This is
17 the money spent for all the ads, right there (indicating).

18 When I closed the account, there was \$36.77 left from money
19 solicited. These are the bills that are outstanding

20 (indicating). These are the bills that I received from the
21 Precision Press who prepared the art work for the stuff that
22 appeared in the magazines. It included -- right here

CBT/cs

1 (indicating) -- mimeographing, postage. And I didn't have
2 enough money to pay this thing here, so I paid it myself.

3 BY MR. MORGAN:

4 Q How much of your own money did you pay?

5 A Right here (indicating); add this. \$985 to
6 compensate for this (indicating)

7 Q Of your own money?

8 A Yes.

9 MR. PARKER: And your initial \$1,000 --

10 THE WITNESS: I made a \$1,000 initial contribution
11 when I opened the account, and that helped pay for some of
12 these ads.

13 BY MR. MORGAN:

14 Q You made a \$1,000 contribution, and then you made
15 another \$985 contribution?

16 A Yes.

17 Q These figures apply to the mailing itself?

18 A That's exactly right. That was our only source of
19 income, that letter. I've got bank statements here.

20 MR. PARKER: Counsel has the bank statements.

21 THE WITNESS: All right. So I don't know why he's
22 asking me the questions.

CBT/cs

MR. PARKER: Well, he has to.

THE WITNESS: All right. We list here all the contributors. Do you see this (indicating)? I have the names and addresses of everybody contributing, the amount they contributed.

BY MR. MORGAN:

Q I understand; I've read that.

A Okay. Everybody. I've got their names and addresses and what they contributed.

Q What was the total amount?

A \$6,425.

MR. MORGAN: Let the record reflect that the witness is referring to his response.

BY MR. MORGAN:

Q That's all the money that was raised?

A That was all the money that was collected and deposited in the bank.

Q What bank?

A First National State.

Q Was all the money spent on these ads?

A Ads only, nothing else.

Q What about the postage, the printing?

CBT/cs 1

A You asked me that question before, did you not? I absorbed that. I paid for it.

3 MR. PARKER: That's the 900-and-some extra
4 dollars.

5 BY MR. MORGAN:

6 Q So the funds from the mailing were only spent to
7 place the ads?

8 A That's right.

9 Q And you paid for the printing, the postage, the
10 mimeographing?

11 A Mimeographing, art work. It's itemized right here
12 (indicating) -- right here.

13 Q So the funds you raised in the letter --

14 A There he goes again.

15 MR. PARKER: No, no, wait. Listen to him first.

16 BY MR. MORGAN:

17 Q The funds raised from the letter were only spent
18 on ads?

19 A That's exactly right.

20 Q And the art work and the placement and copying --
21 you paid for that?

22 A I paid for that, yes.

CBT/cs

1

Q Of both this letter, FEC Exhibit 1, the fund-

2

raising letter --

3

A Yes. That's the only letter.

4

Q The ads themselves?

5

A Yes.

6

Q Did you pay for the printing and the copying of

7

those, too?

8

A Right.

9

Q Was there any surplus money, any extra money left

10

over in the account?

11

A Yes. There was \$36.77, right there (indicating).

12

Q What did you do with that?

13

A I took it. It was the balance in the bank, and I

14

paid these bills out of that. In other words, what I got on

15

here, I added and I paid those bills.

16

Q What bills are those?

17

A Right there (indicating).

18

Q Mr. Chirgotis, I remind you this is taken on a

19

written record, so when you say "there" --

20

A Do you want me to read it for you?

21

Q State where you're getting the information from.

22

A Okay. For professional services rendered for

CBT/cs

1 secretarial work performed, \$425, which I paid for. Art
2 work, photocopying, mimeographing, postage, telephone, et
3 cetera, \$560. And I paid for that.

4 Q Did anyone from Bush-Quayle advise you on how to
5 spend the money?

6 A No.

7 Q Where to place the ads?

8 A No.

9 Q What information did you get from Bush-Quayle
10 about --

11 A Nothing.

12 Q Did you talk to them after you raised the money?

13 A No.

14 Q You didn't talk to them at all in October or
15 November of 1988?

16 A No, no.

17 MR. MORGAN: I'd like to take a break.

18 (Whereupon, a short recess was taken.)

19 MR. MORGAN: I'd like to hand this to the reporter
20 and have it marked FEC Exhibit 2. I'm handing a copy of FEC
21 Exhibit 2 to Mr. Chirgotis and his attorney, Mr. Parker.

22

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CBT/cs 1

(The document referred to was
marked for identification as
FEC Exhibit No. 2.)

2

3

4

BY MR. MORGAN:

5

Q Mr. Chirgotis, before we went to the break you

6

gave some answers that contradicted some of the things you

7

said at the beginning of the deposition.

8

A What, for example?

9

Q You stated before we went to break that you did

10

not speak to anyone in the Bush-Quayle campaign in October

11

or November 1988. You said you spoke in August of 1988 with

12

people from the Bush-Quayle campaign and came to Washington,

13

D.C. Let's try to establish a time line.

14

In August of 1988 you met with who from the Bush-

15

Quayle '88?

16

A I didn't meet anybody. I came to the National

17

Press Club where they invited me to go, and there were two

18

or three hundred people there. I don't remember who I spoke

19

to. I remember Mr. Parker being there, and I remember Mr.

20

Perros being there. But outside of that, I didn't make

21

another trip to Washington.

22

Q When was your next contact with individuals from

CBT/cs 1 the Bush-Quayle campaign?

2 A Well, I had several contacts. As I mentioned
3 before, I spoke to maybe a half-dozen people there at
4 different times.

5 Q What times? What specific times?

6 A I don't remember dates.

7 Q In September of 1988?

8 A September? I don't think -- I don't remember
9 dates; I'm sorry.

10 Q You said earlier in October of 1988 that you had
11 several conversations.

12 A That's true, but I don't remember the dates,
13 whether it was in October or whether it was in September. I
14 did call up headquarters on occasion to get information, but
15 don't ask me whether it was September or October. I don't
16 remember.

17 Q When you sent out FEC Exhibit 1 for mailing, when
18 did you send it out?

19 A Shortly after -- I answered that question before.
20 We received the stationery from Mr. Zogby sometime in the
21 middle of October. About 10 days after that I mailed the
22 letter out. You asked me that question before.

CBT/cs

1

Q On October 22?

2

A In about 10 days, eight or 10 days.

3

Q After you mailed out the letter on October 22, did

4

you have any other contact with the Bush-Quayle campaign?

5

A Yes, on occasion.

6

Q What was the substance of those conversations?

7

A I don't remember.

8

Q Did you talk about the mailing?

9

A No.

10

Q Did you talk about the ads?

11

A No.

12

Q Did they know you had sent out and placed these

13

ads in Greek American publications?

14

A Well, they must have assumed I did that because

15

originally, when they told us we could raise our funds and

16

send out our own ads, I assumed they knew about it.

17

Q What was the basis of that assumption?

18

A They told us they had no funds. The Bush-Quayle

19

campaign said they did not have any funds for us. But we

20

were told at that time, as I mentioned before -- and I'm

21

repeating myself -- that if we wanted to raise our own money

22

for ads, we could do that. And that's exactly what I did.

CBT/cs

1 Q Did they tell you how to raise funds?

2 A No, they didn't tell me that. I assumed that we
3 could go about raising funds any way that we thought would
4 be proper, and we thought the letter would be the way of
5 doing it. And that's exactly what I did.

6 Q When you got the letterhead from Bush-Quayle, did
7 you believe then it was okay to send out --

8 A Apparently they authorized me to do it. Why would
9 they send me the stationery?

10 Q So when you got the stationery, you thought --

11 A -- everything was okay, so we went out and I did
12 it. And the stationery does have "Bush-Quayle Committee" on
13 it, doesn't it?

14 Q Yes.

15 A Sure. They printed the stationery; I didn't print
16 it.

17 Q Was this part of FEC Exhibit 1?

18 MR. PARKER: This is blurred. Is there a clearer
19 one?

20 This was the amount (indicating).

21 THE WITNESS: No, that's something we typed in
22 there.

CBT/cs

1

MR. PARKER: But this is the letterhead, and it

2

gives the address of the headquarters, and it says, "Paid

3

for by Bush-Quayle 88."

4

THE WITNESS: That was at the bottom. This is

5

mimeographed.

6

MR. PARKER: In other words, this was the

7

letterhead you received?

8

THE WITNESS: That's right.

9

MR. MORGAN: Let the record reflect that we are

10

discussing FEC Exhibit 1, the very bottom portion of FEC

11

Exhibit 1 where it says, "Paid for by Bush-Quayle 88."

12

BY MR. MORGAN:

13

Q

So you took the fact that the stationery said

14

"Paid for by Bush-Quayle 88" --

15

A

It was my authorization to go ahead and do

16

whatever we wanted with the stationery. Otherwise, why did

17

they send it to me?

18

Q

Including raising funds?

19

A

Yes. Well, they told me that. We were told that

20

they did not have any funds for us; okay? They said the

21

Bush-Quayle committee did not have any funds, and if we

22

wanted to go out and raise money to pay for these ads, we

CBT/cs

1 could do it. That's exactly what I did.

2 Q I understand that some of this stuff may seem kind
3 of repetitive, but this is new to me. You lived this, and
4 I'm trying to look back and figure out what happened and
5 what went on, so bear with me.

6 Who told you you could fund-raise, to fund-raise,
that they didn't have any money?

8 MR. PARKER: Wait; wait. We've been through this.
9 I distinctly remember that question being asked, and Mr.
10 Chirgotis said that he was told --

11 MR. MORGAN: We have a record.

12 MR. PARKER: I vouch the record. He was told that
13 they had no more funds. Now, can you say who told you they
14 had no more funds? Can you identify that person?

15 THE WITNESS: No.

16 MR. PARKER: But you were told they had no more
17 funds?

18 THE WITNESS: They had no funds, and if we wanted
19 to go out and raise money for any ads or publicity, we could
20 do it, and that's exactly what I did.

21 BY MR. MORGAN:

22 Q Did Mr. Zogby tell you that?

CBT/cs 1

A It could have been. Like I said before, Mr. Zogby was the one person I spoke to on more occasions than anybody else.

Q So it's more than likely that he was the one who told you?

A In all probability, yes.

Q Were you ever instructed by anyone from the Bush-Quayle campaign not to raise funds on behalf of Bush-Quayle?

A No.

MR. PARKER: Now, you --

THE WITNESS: Well, this came later (indicating).

MR. PARKER: Maybe that's what he's asking you to answer.

Off the record.

(Discussion off the record.)

MR. PARKER: Back on the record.

MR. MORGAN: I'm going to ask the reporter to mark this FEC Exhibit 3. And I'm going to hand a copy of FEC Exhibit 3 to Mr. Chirgotis and his attorney, Mr. Parker.

(The document referred to was marked for identification as FEC Exhibit No. 3.)

CBT/cs

(The witness examined the document.)

BY MR. MORGAN:

Q Mr. Chirgotis, could you identify FEC Exhibit 3 for the record.

A Yes.

Q What is it?

A It's a memorandum to all national and state coalition leaders.

Q What does it involve?

MR. PARKER: Well, did you ever receive that?

THE WITNESS: I believe I may have received it. I don't remember it but I may have received it. I used to get so much mail in the office. I may have received it; I don't know.

BY MR. MORGAN:

Q Did you receive it before or after you sent the mailing which is FEC Exhibit 1?

A I don't remember. I don't remember. I just followed instructions. I was told to go ahead --

MR. PARKER: I think the record ought to show that the Zogby supply of stationery bears the same date that the memorandum from Ceci Cole McInturff does, and this came --

CBT/cs

1

MR. MORGAN: At the same time?

2

MR. PARKER: Well, we don't really know.

3

THE WITNESS: This (indicating) came by parcel post, I remember, because it was a box. It wasn't first-class mailing. So this apparently came out later.

6

MR. MORGAN: The witness was just referring to FEC Exhibit 2.

8

BY MR. MORGAN:

9

Q Do you recall how you received this letter?

10

A This letter?

11

Q FEC Exhibit 3, the memorandum.

12

A This may have come in first class, I would think.

13

But this (indicating) definitely came in a box, which parcel post takes a little longer.

15

Q Do you recall seeing a copy or a similar presentation of FEC Exhibit 3?

16

17

A This letter here (indicating)?

18

Q Did you have an opportunity to read it?

19

A I may have read it.

20

MR. PARKER: No, have you read it now?

21

THE WITNESS: Oh, now, yes. I'm down to the last two paragraphs.

22

CBT/cs

1

MR. MORGAN: You can finish.

2

THE WITNESS: Okay (examining document).

3

Okay, I've read it.

4

BY MR. MORGAN:

5

Q Do you recall receiving information similar to

6

that contained in FEC Exhibit 3?

7

A This (indicating)?

8

Q Yes.

9

A Like I mentioned before, I may have received it.

10

Q Not necessarily this particular memo, but

11

information similar to that contained in this memo?

12

A Well, they kept sending me literature. I got

13

literature --

14

MR. PARKER: I think counsel's question is: Do

15

you recall receiving anything like this instructing you that

16

you cannot raise funds?

17

THE WITNESS: No, no, definitely not; definitely

18

not. We went under the assumption that we were authorized

19

to proceed to raise money to pay for the ads, and we went

20

along with that assumption.

21

BY MR. MORGAN:

22

Q Is your understanding now that FEC Exhibit 3, the

CBT/cs

1 mailing you just read, would be a prohibition on sending out
2 the fund-raising letter?

3 A That's what the letter states.

4 Q But at the time, was that your understanding? The
5 information contained in the letter -- at the time was that
6 your understanding?

7 A No, my understanding was to proceed to raise funds
8 to pay for the ads.

9 Q Did you receive any information from Bush-Quayle
10 on federal election law?

11 A No. Well, if I did I don't remember it.

12 Q Do you consider yourself knowledgeable at all of
13 federal election law?

14 A I don't know a thing about it.

15 Q Restrictions on your activities?

16 A I don't know a thing about it.

17 Q How did you find out about the complaint in this
18 matter?

19 A I received a letter from a Mr. Potter.

20 Q Where is Mr. Potter from?

21 A From the firm of Wiley, Rein & Fielding. Here it
22 is (indicating).

CBT/cs

1

MR. MORGAN: I'm going to ask the reporter to mark

2

this as FEC Exhibit 4. I'm handing a copy of FEC Exhibit 4

3

to Mr. Chirgotis and his attorney, Mr. Parker.

4

(The document referred to was

5

marked for identification as

6

FEC Exhibit No. 4.)

7

MR. MORGAN: Off the record.

8

(Discussion off the record.)

9

BY MR. MORGAN:

10

Q

Can you identify FEC Exhibit 4?

11

A

Yes.

12

Q

Would you describe FEC Exhibit 4?

13

A

Yes.

14

Q

Go ahead.

15

A

Do you want me to read it?

16

MR. PARKER: No, just say who it's from and what

17

it is.

18

THE WITNESS: The letter is from Mr. Jan W. Baran

19

addressed to me on November 14.

20

MR. PARKER: And who is Mr. Baran?

21

THE WITNESS: General Counsel of Bush-Quayle 88.

22

CBT/cs

BY MR. MORGAN:

Q What was the purpose of the letter?

A He sent me a letter dated November 1, '88.

Q Where is the attached letter from?

A It's from the Federal Election Commission.

Q What is the subject of that letter?

A Do you want me to read the whole letter?

MR. PARKER: Just in essence.

THE WITNESS: It says, "This letter is to notify you that on October 31, 1988, the Federal Election Committee received a complaint which alleges that Greek Americans for Bush and those persons mentioned above may have violated certain sections of the Federal Election Campaign Act of '71."

BY MR. MORGAN:

Q So this letter gave you notice of possible violation of the federal election law?

A Yes.

Q Was this the first notice you had of the complaint?

A Yes.

Q When you got the letter, did you call Mr. Potter

9304350001

CBT/cs

1 in regards to the letter?

2 A I think I did. I did call him.

3 Q When did you call him?

4 A It may have been shortly after I received this
5 letter.

6 Q Did you go see him?

7 A No, I called him on the telephone.

8 Q And what was the substance of that conversation?

9 A He asked me to send him various exhibits, which I
10 did.11 Q Did he give you the impression that he was going
12 to represent you in this matter?13 A No, he didn't say he was going to represent
14 anybody.

15 Q Why did he ask for the information?

16 A I don't know why, but I did what he asked me to
17 do, and I sent him a whole package of all the
18 correspondence; I sent him bank checks; I sent him a list of
19 the people that I collected money from, and my total
20 expenses.

21 Q Indicating what? What was the purpose of it?

22 A Indicating my activities with the Greek American

CBT/cs

1 campaign.

2 Q Did you have any other conversations?

3 A No conversations. I sent him the material, and
4 shortly thereafter he mailed everything back to me.5 Q You sent it after he asked you to send it in a
6 phone conversation?7 A He asked me to submit all my records, which I did.
8 I just mentioned I sent my bank statements; I sent him a
9 list of the donors; I sent him an itemized list of all the
10 contributors; I sent him an outstanding payable accounts
11 record which totalled \$985, and I stated in my letter it was
12 not paid because we had insufficient funds at that time, and
13 I sent him copies of all my paid bills and illustrations of
14 the advertising that appeared in each of the six
15 publications.16 MR. MORGAN: I'm going to ask the reporter to mark
17 this FEC Exhibit 5. I'm handing a copy of FEC Exhibit 5 to
18 Mr. Chirgotis and Mr. Parker.19 (The document referred to was
20 marked for identification as
21 FEC Exhibit No. 5.)

22 MR. MORGAN: Let the record reflect that Mr.

CBT/cs

1 Chirgotis is reviewing FEC Exhibit 5 and its enclosures.

2 (The witness examined the document.)

3 BY MR. MORGAN:

4 Q Could you identify again FEC Exhibit 5?

5 A Yes.

6 Q What is it? I understand that you referred to it
7 earlier, but for the record we need to specifically identify
8 it

9 A This is a list of all the bank statements that
10 showed all the deposits. There's an itemized list of all
11 the contributors and the amount contributed. It indicated
12 the outstanding payable accounts which totaled \$985.
13 There's a copy of all the paid bills and illustrations of
14 the advertising that appeared in each of the six
15 publications.

16 Q So when you sent this mailing, you expected the
17 Bush-Quayle campaign to reimburse the bills you had?

18 A I didn't expect anything. He requested my records
19 and I mailed it to him.

20 Q I'm referring to the second paragraph of FEC
21 Exhibit 5. After you list 1 through 4, the paragraph --

22 A Oh, at one time -- let me refresh my memory now.

9304350004

CBT/cs

1 At one time during our conversation I was told that if we
2 had any bills they would take care of them -- at one time
3 during our conversation.

4 Q During your conversation with whom?

5 A That's the reason why I stated in this paragraph
6 here that there were two -- also they said they were going
7 to refund the money to the donors. That's why I sent the
8 addresses. You notice on page 2, they wanted the name and
9 address of every donor. That's the reason I listed the name
10 and address so if they wanted to refund this money to them,
11 they had the name and the address. That's the reason why I
12 did that.

13 Q Why were they going to refund it?

14 MR. PARKER: Let's go off the record for a minute.

15 (Discussion off the record.)

16 MR. MORGAN: Back on the record.

17 BY MR. MORGAN:

18 Q Why did you submit the addresses and the phone
19 numbers of the people to be refunded?

20 A It was my understanding at that time that they
21 were going to reimburse these people for the money that they
22 had sent us.

CBT/cs

1

Q Your understanding from what? From your

2

conversation with Mr. Potter?

3

A With Mr. Potter; right.

4

Q What did he say specifically; do you recall?

5

A That I don't recall. All I do remember is that he

6

asked for the exhibits, which I mailed him.

7

Q And what else did he ask?

8

A I don't remember anything else.

9

Q Did the Bush-Quayle campaign refund the money?

10

A Not that I know of.

11

Q Did they pay the unpaid bills?

12

A No.

13

Q Why not?

14

A Well, they said they didn't have any funds to pay

15

the bills; right?

16

Q They did say that? They said they didn't have the

17

money to cover your bills?

18

A Yes.

19

Q But did Mr. Potter say that they would pay the

20

bills and refund the money?

21

A It was my understanding at that time that they

22

were going to reimburse these people for the money they

CBT/cs

1 contributed. That is the reason why I sent them the names
2 and the addresses, the amount of money that each person gave
3 me, so if they decided to refund these people the money they
4 would have the name and address and the amount for each
5 individual.

6 Q Did they refund the money?

7 A I don't know what they did.

8 Q How many conversations did you have with Mr.
9 Potter or members of his law firm?

10 A I think it was only one, maybe two -- I think it
11 was only one, maybe two.

12 Q Did you speak with anybody else from the law firm?

13 A No, nobody else.

14 Q Did you speak with anyone else from the Bush-
15 Quayle campaign?

16 A No.

17 MR. MORGAN: I am going to ask the reporter to
18 mark this FEC Exhibit 6. I'm handing a copy of FEC Exhibit
19 6 to Mr. Chirgotis and his attorney, Mr. Parker.

20 (The document referred to was
21 marked for identification as
22 FEC Exhibit No. 6.)

9304350007

CBT/cs

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BY MR. MORGAN:

Q Could you identify FEC Exhibit 6?

MR. PARKER: Do you know what that is?

THE WITNESS: Yes.

MR. PARKER: Tell him.

THE WITNESS: This was the last outstanding bill I had at that time that was unpaid. And for the record, I told him that the outstanding unpaid bills at that time was \$1,785.

BY MR. MORGAN:

Q Did you expect to be reimbursed that \$1,785?

A No.

Q Why did you send him that bill?

A I wanted that as a matter of record because he said he was going to reimburse the money for these people, and if they were going to pay those bills, he should reimburse me, too.

Q So you thought he was going to reimburse you?

A Well, if he was going to reimburse these people, he should have paid this bill, too.

Q You're referring to the individuals listed in FEC Exhibit 5?

CBT/cs 1

A Right.

2

Q Were you reimbursed?

3

A No.

4

Q Why not?

5

MR. PARKER: Obviously he can't guess.

6

BY MR. MORGAN:

7

Q Did they give you a reason why they didn't

8

reimburse you?

9

A No reason.

10

Q Were you upset?

11

A No.

12

Q How did you feel?

13

A It didn't bother me.

14

MR. MORGAN: I'm going to ask the reporter to mark

15

this letter as FEC Exhibit 7. I'm handing a copy of FEC

16

Exhibit 7 to Mr. Chirgotis and Mr. Parker.

17

(The document referred to was

18

marked for identification as

19

FEC Exhibit No. 7.)

20

(The witness examined the document.)

21

BY MR. MORGAN:

22

Q Mr. Chirgotis, could you identify FEC Exhibit 7

CBT/cs

1 for the record.

2 A Yes.

3 Q What is it?

4 A What do you mean, what is it?

5 Q What's it about? What does it discussed?

6 A Do you want me to read the letter?

7 Q Who is it from?

8 MR. PARKER: Who is it from and what is the
9 substance?10 THE WITNESS: Trevor Potter. And the substance of
11 the letter is that he returned all the material that I sent
12 him.

13 BY MR. MORGAN:

14 Q Why did he ask you to return everything?

15 A Why did he ask me?

16 Q Yes.

17 A Why did he ask me?

18 Q Right.

19 A He returned all the material I sent him.

20 Q I'm sorry; I apologize. Before you received the
21 letter, did you expect him to reimburse you?

22 A I didn't expect anything.

CBT/cs

1 Q Did you expect to get everything back from him?

2 A No.

3 Q Did you call him up when you got this letter?

4 A No.

5 Q Did you expect him to take care of the --

6 A I didn't expect anything.

7 Q Before you got this letter and you sent him the
8 bank statements and FEC Exhibit 5 -- you sent him the bank
9 statements, the list of contributions, the outstanding
10 payable accounts --

11 A Yes, I sent him all that material.

12 Q Did you expect to get that material back?

13 A I just told you I didn't expect anything. I
14 didn't know what he was going to do with the material. He
15 could have torn it up and thrown it away; right?

16 Q He could have.

17 A Well, how can I expect him to return anything?

18 Q So you were surprised when you got it back?

19 A I wasn't surprised. The man just sent me
20 something and I accepted it. And I had some unpaid bills
21 and I paid them out of my pocket; okay? Please don't go any
22 further.

CBT/cs

1

MR. PARKER: Let me ask a question. You kept all

2

of your records as you are used to doing in your

3

professional office?

4

THE WITNESS: That's exactly right.

5

MR. PARKER: And these things you were sending to

6

Mr. Trevor Potter constituted your file and your activities

7

and reports to him.

8

THE WITNESS: That's very true, and it's a

9

complete file. I itemized everything that I got. I

10

answered every question that they asked me.

11

MR. PARKER: And you only became aware of a

12

problem some time in the middle of November when they sent

13

you a copy of the complaint that had been filed with the

14

FEC?

15

THE WITNESS: No, it was after the election or

16

about that time, as I recall it. As a matter of fact, at

17

that time when I got this letter, I had a couple of checks

18

that people had sent me -- I think there were two or three

19

checks that I got -- and the fact that I realized apparently

20

there was something done wrong here, I sent these checks

21

back. This I did.

22

CBT/cs 1

BY MR. MORGAN:

2 Q When did you get the checks?

3 A I had two or three checks. When I was told this,
4 I mailed the checks back.

5 Q When you were told of the complaint?

6 A Yes. As I remember, there were two or three
7 checks I had, and I mailed them back to the donors.8 MR. PARKER: That would be in addition to the ones
9 that had come prior?10 THE WITNESS: There's no question of that, because
11 those checks that came prior to that I deposited in the
12 bank, and the bills that were outstanding I paid myself.

13 BY MR. MORGAN:

14 Q Did you reimburse any other folks that had sent in
15 money?

16 A No.

17 Q These are the ones after you heard about the
18 complaint?

19 A Right.

20 Q Did you call anyone at Mr. Potter's law firm? Did
21 you call Mr. Potter when you got the material?

22 A No, I got the material, and that was the end of my

CBT/cs

1 dealings with the Potter organization. He sent all the
2 materials back. There was nothing for me to do.

3 Q In FEC Exhibit 7, Mr. Potter refers to a telephone
4 conversation in the second paragraph that started, "As I
5 informed you on the telephone, these activities were not
6 authorized by Bush-Quayle 88."

7 Do you recall that conversation?

8 A The conversation I had with him is that he wanted
9 all my records, which I sent.

10 Q So did you have a conversation with him?

11 A I had one conversation with him. I may have had a
12 second one but I don't remember. If I had known that I was
13 going to go through this thing, I would have kept a record
14 of every telephone conversation.

15 Q Do you recall Mr. Potter or anyone from the Bush-
16 Quayle organization telling you that your activities in
17 regard to the fund-raising letter were not authorized by
18 Bush-Quayle 88?

19 A No, nobody ever told me that. It was from the
20 correspondence that I got.

21 MR. PARKER: Which was after the complaint was
22 filed.

CBT/cs

1

THE WITNESS: It was after the complaint was

2

filed.

3

BY MR. MORGAN:

4

Q So after the complaint was filed, did you have a

5

conversation with Mr. Potter?

6

A As evidence of good faith, I had those checks

7

which I returned. I could have kept them; I could have put

8

them in the bank.

9

Q So what conversation is Mr. Potter referring to?

10

MR. PARKER: Can we go off the record?

11

MR. MORGAN: Sure.

12

(Discussion off the record.)

13

MR. MORGAN: Back on the record.

14

BY MR. MORGAN:

15

Q With reference to FEC Exhibit 7, in the second

16

paragraph Mr. Potter, the author of the letter, refers to a

17

telephone conversation in his letter to Mr. Chirgotis. He

18

said, "As I informed you on the telephone, these activities

19

were not authorized by Bush-Quayle 88."

20

Do you recall this telephone conversation?

21

A I don't recall the conversation.

22

Q After you received this December 2, 1988, letter,

CBT/cs

1 did you receive any other correspondence or have any other
2 phone conversations with him?

3 A No.

4 Q Did you consider Greek Americans for Bush an
5 independent organization or part of the Bush-Quayle 88
6 campaign?

7 A Independent.

8 Q Not connected at all with Bush-Quayle 88?

9 A No.

10 Q Did the Greek Americans for Bush engage in any
11 other fund-raising activities?

12 A No.

13 Q The fund-raising letter was the only activity?

14 A Yes.

15 Q You testified earlier that Greek Americans for
16 Bush was part of the Ethnic Nationalities Coalition.

17 A Yes.

18 Q Was the Ethnic Coalition part of the Bush-Quayle
19 campaign?

20 A No.

21 MR. PARKER: Can we go off the record?

22 MR. MORGAN: Yes.

CBT/cs

(Discussion off the record.)

MR. MORGAN: Let's go back on the record.

BY MR. MORGAN:

Q Mr. Chirgotis, how would you characterize Greek Americans for Bush?

A Well, we were under the Coalition of American Nationalities, and we raised money as an individual group.

Q Was the Coalition of American Nationalities part of Bush-Quayle?

A Well, we had to be, because why would I be --

MR. PARKER: Answer him yes.

THE WITNESS: Yes.

BY MR. MORGAN:

Q So you were not an independent organization?

A We're independent insofar as raising money for the ads.

Q For the FEC Exhibit 1, for the fund-raising letter?

A Yes.

Q But as Greek Americans for Bush, as an organization, were you a wildcat group freelancing, or were you a part of the Bush-Quayle ii?

CBT/cs

1

A I don't understand the question.

2

Q What I'm trying to ask is: Were you independent

3

or were you a part of the Bush-Quayle?

4

A We were independent insofar as raising funds to

5

send this letter out, but we were part of the nationalities

6

group. We had to be.

7

Q And the nationalities group was a part of the

8

Bush-Quayle 88 campaign?

9

A Yes.

10

Q Did Greek Americans for Bush accept contributions

11

from corporations?

12

A No.

13

Q Political action committees?

14

A No.

15

Q Labor unions?

16

A No.

17

Q From individuals?

18

A Yes.

19

Q From any other type of entity or group?

20

A No.

21

Q Did Greek Americans for Bush take out any loans?

22

A No.

9304350018

CBT/cs

1

Q Are you aware that organizations that expend more

2

than \$1,000 or contribute more than \$1,000 are required to

3

register with the Federal Election Commission?

4

A Yes.

5

Q How did you know that?

6

A Hearsay, that the maximum contribution would be

7

\$1,000. That's the reason why I opened the account with

8

\$1,000.

9

Q \$1,000 for an individual?

10

A Yes.

11

Q What about for the organization? Were you aware

12

of any limits?

13

MR. PARKER: If you know those things, you can

14

answer. If you don't know, don't try and answer. This is a

15

matter of law. Are you familiar with the Federal Election

16

Commission?

17

THE WITNESS: No, I'm not familiar with that. All

18

I know is by hearsay that the maximum contribution has to be

19

\$1,000.

20

MR. PARKER: Well, that's political individual

21

contributions.

22

9304350019

CBT/cs 1

BY MR. MORGAN:

2 Q Were you aware that an organization as opposed to
3 an individual --

4 A I don't know anything about that.

5 Q Let me finish the question. Were you aware that
6 organizations that spend more than \$1,000 or accept more
7 than \$1,000 in contributions --

8 A I don't know.

9 MR. PARKER: Wait a minute.

10 BY MR. MORGAN:

11 Q -- are required to register and report to the
12 Federal Election Commission?

13 A No.

14 Q Does Greek Americans for Bush still exist?

15 A No.

16 MR. MORGAN: Can we take a break?

17 (Whereupon, a short recess was taken.)

18 MR. MORGAN: Back on the record.

19 BY MR. MORGAN:

20 Q Mr. Chirgotis, just a couple more questions. You
21 testified before we broke that Greek Americans for Bush was
22 not an independent organization, but at the beginning of the

9304350020

CBT/cs

1 deposition you testified that you got a lot of the text of
2 FEC Exhibit 1, the fund-raising letter, from the Bush-Quayle
3 campaign.

4 A Yes.

5 Q And you testified that the stationery and
6 letterhead came from Mr. Zogby, and you referred to FEC
7 Exhibit 2.

8 A Yes.

9 Q And you were under the impression that it was okay
10 to fund-raise, that that's what you were supposed to do. Do
11 you still think the letter and the fund-raising activity was
12 independent of the Bush-Quayle campaign?

13 A The fund-raising campaign, yes; it was independent
14 -- independent so far as collecting the money. You're
15 splitting hairs here. It was independent so far as we
16 collecting money to pay for the ads, but we were part of the
17 group.

18 Q You were part of the Bush-Quayle campaign?

19 A Yes.

20 Q And you thought what you were doing was okay by
21 the Bush-Quayle campaign?

22 A Isn't that what I just said?

CBT/cs

MR. PARKER: I'll cover that, too.

BY MR. MORGAN:

Q I asked the last couple of questions about the fund-raising activity and your impression of what the Bush-Quayle campaign thought of your activities. The record has been kind of choppy; we've been kind of going back and forth, so I want it clear: Did you think it was okay by the Bush-Quayle campaign for you to send out the letter and for you to fund-raise?

A Definitely.

Q Based on what? Telephone conversation?

A Based upon my conversation I had with the personnel at headquarters.

Q At Bush-Quayle headquarters?

A Yes.

Q And the meeting you had at the National Press Club?

MR. PARKER: No.

THE WITNESS: That was an orientation there.

BY MR. MORGAN:

Q But based on the fact that Zogby sent you the letterhead and your conversations with him --

CBT/cs

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A That was a go-ahead signal. Otherwise, why would he send me the stationery?

MR. MORGAN: Okay.

CROSS-EXAMINATION

BY MR. PARKER:

Q I just want to make sure one point is clear that we were agonizing over, and that is your understanding of what the Greek Americans for Bush-Quayle were doing on a single project. And I refer you to the letter which is FEC Exhibit 1 on the Bush-Quayle stationery, Coalition of American Nationalities, which is undated but went out, as you testified, sometime perhaps in the third week of October --

A October.

Q -- after you received the stationery. And the stationery you received from Mr. Zogby?

A Yes.

Q Now, when you refer to something as being independent, are you referring to this independent project of raising the money to pay for the ads in the six Greek American newspapers?

A Yes; yes.

CBT/cs

1

Q Did you always consider that the Greek Americans

2

for Bush-Quayle were part of the Coalition of American

3

Nationalities?

4

A Yes.

5

Q And authorized by the national campaign?

6

A Yes.

7

Q And the person that you probably had the most

8

contact with in preparing this project of putting six ads in

9

the Greek American newspapers was Mr. Charles Zogby of

10

National Voter Coalition?

11

A Yes.

12

Q You mentioned other names but there was no

13

substance, apparently, of this project.

14

A Yes.

15

Q You received, as anyone who was part of the

16

campaign, mailing packages of a variety of materials, did

17

you not?

18

A Yes, quite regularly.

19

Q I believe you answered this: When you first were

20

informed that this particular solicitation was in possible

21

conflict with the FEC regulations, that came as a result of

22

the complaint filed by Dukakis-Bentsen on December 1st?

CBT/cs

1

A Yes.

2

Q And you received, through the counsel of Bush-

3

Quayle, a copy of that complaint?

4

A (Nodding.)

5

Q And subsequently, Mr. Potter wrote to you,

6

returned all your activities which you sent to him showing

7

what you received, what you expended, what you opened your

8

account with -- he returned them to you with his cover

9

letter.

10

A Yes.

11

Q So at no time did you operate this committee as a

12

wildcat or offshoot arm of the Bush-Quayle campaign or an

13

unauthorized arm of the Bush-Quayle campaign?

14

A No.

15

MR. PARKER: That's all I have.

16

MR. MORGAN: I am required by the Federal Election

17

Campaign Act to tender a check for witness fee and mileage

18

fee. Mr. Chirgotis, I am giving you a check in the amount

19

of \$126.30.

20

THE WITNESS: What's that for?

21

MR. MORGAN: For coming down here.

22

And you said you'd like to review and sign a copy

CBT/cs

1 of the transcript?

2 MR. PARKER: Yes.

3 MR. MORGAN: Thank you for your time. We'll be in
4 touch with you if we need any more information.5 (Whereupon, at 12:20 p.m., the taking of the
6 deposition was concluded.)7
8
9
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Subscribed and sworn to before me
this 12 day of September, 19 89.Helga Lucero
Notary Public
My Commission Expires _____HELGA LUCERO
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Sept. 13, 1993

CERTIFICATE OF NOTARY PUBLIC & REPORTER

I, Claire B. Tepper, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken in shorthand and thereafter reduced to typewriting by me or under my direction; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and, further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially or otherwise interested in the outcome of the action.

Claire B Tepper

Notary Public in and for the
District of Columbia

My Commission Expires
January 31, 1990

9304350027

FEC Ex 1
8/7/89 cjt

Bush 88 Quayle

Coalition of American Nationalities

DEAR HELLENE:-

Greek Americans

Honorary Chairs

Rep. Michael Bilirakis
Rep. George Gekas
Rep. Olympia Snowe
William P. Tavoulareas

Chair

William Chirgotis

Co-Chairs

Alec P. Courtelis
Adeline Geo-Karis
John N. Parker Esq.
Dr. Theodore Pemo
Dr. John Skandalekis

Vice Chair

Kris Anne Vogelpohl

On November 8, Americans will go the polls to elect a new President. Each of us has the responsibility to evaluate the qualifications of the nominees and then to vote for the person who is best suited to lead the nation for the next four years.

I am an American of Greek descent, and very proud of my heritage. Throughout my professional career as an architect, I have always participated actively in community affairs, the programs of my Church, and in the Order of Ahepa for which I was privileged to serve as the Supreme President. I mention this not for any self-serving purpose but merely to acquaint you with my background.

Governor Dukakis has frequently spoken of his Greek heritage. We all are justifiably proud that a Hellene has been nominated for the highest office in the land. But that alone should not be the criterion by which selection to the Presidency should be made. Experience as a Governor cannot be compared to service in Congress, Director of the CIA, and eight years as Vice President which George Bush has experienced. But more importantly, the achievements of the Reagan-Bush ticket, during the past eight years, in reducing taxes, unemployment, interest rates, inflation, and successes in foreign affairs including a treaty with the Soviet Union for reduction of nuclear weapons, all of these and more, has convinced me that George Bush must be elected President.

Because I and other Greek-Americans wish to convey this message to the Greek-American community, we are seeking contributions from all who endorse our position to defray the costs for placements of ads in the 13 Greek publications throughout the country. A contribution payable to "Greek Americans for Bush" is respectfully and urgently solicited. For your convenience a self-addressed envelope is herewith enclosed. An itemized record of receipts and expenses will be mailed to you after the election.

Sincerely,

William G. Chirgotis
William G. Chirgotis

\$10.00 _____ \$25.00 _____ \$50.00 _____ \$100.00 _____

Bush 88 Quayle

FEC Ex 2
8/7/89 cdt

10.12.88

Mr. Chirgotis -

Here's 250 pieces of Greek American
Committee letterhead with envelopes.

Sorry for the delay in getting this
to you - problems with volunteers.

If you need any more materials
please don't hesitate to call

Charles Zogby

Bush 88 Quayle

Charles Zogby
National Voter Coalitions

733 15th St., N.W.
Washington, D.C. 20005

(202) 624-8601 ext. 5029
T.D.D. (202) 393-6471

733 15th Street, N.W. Suite 800 Washington, D.C. 20005 202/842-1988

Paid for by Bush-Quayle 88

93043500029

FEC 8-3
11/189 CB

Bush 88 Quayle

October 12, 1988

MEMORANDUM TO: ALL NATIONAL AND STATE COALITION LEADERS

FROM: CECI COLE MCINTURFF
DIRECTOR FOR NATIONAL VOTER COALITIONS

As we head into the last three and a half weeks of the campaign, I thought it might be useful to reiterate certain important principles and constraints imposed by Federal election law on Bush-Quayle coalition activities. While these requirements and limitations are no doubt familiar to most of you by now, they bear repeating to help ensure that the campaign is protected against any allegations of wrongdoing in these final, critical days.

First, we should always bear in mind that Bush-Quayle and Victory '88 are separate and distinct activities, subject to different legal requirements, performing different functions and serving related but independent purposes. Individual coalition members, like other volunteers (and unlike Bush-Quayle staff), may at different times act on behalf of either Bush-Quayle or Victory '88. You may not, however, act on behalf of both entities at one time. When you act on behalf of Bush-Quayle, you should always be mindful of the special constraints and requirements that Federal law as well as Bush-Quayle campaign policy place on your activities. If and when, on your own, you act in support of Victory '88 you should bear in mind that you are not at that point representing Bush-Quayle, as a Coalition member or otherwise.

All coalition members should bear in mind the following rules as they engage in various campaign activities:

1. Direction and Control of Victory '88

While Victory '88 offices are properly coordinating their activities with the campaign, all authority for Victory '88 programs and expenditures properly rests with state party officials.

2. Fundraising

Any fundraising activity may be undertaken only by Victory '88, not by Bush-Quayle or its representatives. While you as a campaign volunteer are free, on an individual basis, to assist Victory '88's fundraising

ATTACHMENT

Memorandum to All National and
State Coalition Leaders
October 12, 1988
Page 2

efforts, it should be understood that you are not doing so on behalf of Bush-Quayle. Furthermore, any funds raised for state party Victory '88 accounts may not be specifically "earmarked" for Bush-Quayle expenditures. Obviously funds must be raised in accordance with the applicable Federal and state laws. Victory '88 legal counsel should be consulted as appropriate.

3. Travel Expenses

Travel expenses of Bush-Quayle employees and representatives must be paid by the campaign or (within a \$1000 per person ceiling) by the traveling individuals themselves. Victory '88 funds may not be used to pay for the travel of Bush-Quayle employees and representatives. Victory '88 may offer to pay for travel of individual Bush-Quayle coalition members, and such travel expenses may be accepted, only in those circumstances where the individual is appearing on behalf of Victory '88, the Republican National Committee or some other entity, not on behalf of Bush-Quayle. (A memorandum on the travel expenses of Bush-Quayle representatives is attached.)

4. Pamphlets, Brochures and other Distributional Materials

Victory '88 may reproduce Bush-Quayle campaign materials for dissemination by Victory '88 volunteers as Victory '88 deems appropriate (with appropriate disclaimers by Victory '88). Victory '88, however, should not be asked to pay Bush-Quayle bills for materials being prepared by Bush-Quayle coalitions for Bush-Quayle use.

Legal Guidance

State party officials and their legal counsel are working to ensure that Victory '88 activities are undertaken in accordance with applicable legal requirements. Questions regarding Victory '88 activities should be directed to them. All questions concerning the legal authority for Bush-Quayle coalition activities should be directed to the office of Jan W. Baran, General Counsel to Bush-Quayle: (202)383-4941. No one is authorized to provide legal advice or representation to Bush-Quayle without prior clearance by the General Counsel.

FEC 811
8/7/89 cut

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

JAN W. BARAN
202) 429-7330

November 14, 1988

TELECOPIER
(202) 429-7049
TELEX 248349 WYRN UR

Mr. William Chirgotis
37 Mountain Avenue
Springfield, New Jersey 07081

Federal Express

Dear Mr. Chirgotis:

Attached is a letter from the Federal Election Commission addressed to you at 733 15th Street, N.W., Washington, D.C. 20005, enclosing a complaint filed by the Dukakis/Bentsen Committee, Inc. naming you among others as a respondent.

Please call me or Trevor Potter of my office regarding this matter at your earliest convenience.

Sincerely,



Jan W. Baran
General Counsel
Bush-Quayle 88

Attachment

9304350032

WILLIAM G. CHIRGOTIS
ARCHITECT

27 MOUNTAIN AVENUE • SPRINGFIELD, NEW JERSEY 07081-1737 • 376-3200

FEC 8/5
8/7/89 CBT

November 21, 1988

Wiley, Rein & Fielding
1776 K Street N.W.
Washington, D.C. 20006

Att: Mr. Trevor Potter

RE: Greek-Americans
for Bush Campaign

Dear Mr. Potter:-

In accordance with our recent conversation, I am enclosing herewith the following.

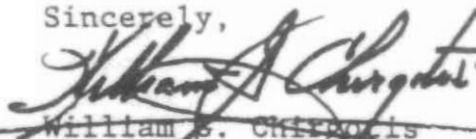
1. Bank statement with our total deposits, and the only bank statement I have received to-date.
2. Itemized list of all contributors and amount contributed.
3. Outstanding payable accounts, totaling \$985.00 have not been paid because of insufficient funds.
4. Copies of all paid bills and illustrations of the advertising that appeared in each of the six publications.

It is my understanding that you propose to refund the money collected to each contributor, and take care of the two outstanding unpaid bills.

In view of the fact, that almost all of the contributors are personal friends, it would be appreciated if you would send me a copy of the letter of explanation, for review, before it is mailed out to them.

If there is any other information you need, please do not hesitate to call me, anytime after Monday, November 28th, as I expect to be out of the office until that time.

Sincerely,


William G. Chirgotis

9304350033

WILLIAM G. CHIRGOTIS
ARCHITECT

37 MOUNTAIN AVENUE • SPRINGFIELD, NEW JERSEY 07081-1787 • 176-3200

GREEK AMERICANS
FOR BUSH-QUAYLE

TOTAL INCOME

William G. Chirgotis \$1,000.00
37 Mountain Ave.
Springfield, N.J. 07081

Dr. Theodore Perros \$ 500.00
500 23rd St., N.W., Apt. B
Washington, D.C. 20037

J. Cavalaris \$ 100.00
138-1 Cheokee Rd.
Charlotte, N.C. 28207

Mrs. Lynda Drivas \$1,000.00
So. Portland Shipyard
257 Front St.
So. Portland, Me. 04106

Mr. George Papuchis \$ 100.00
10312 Conover Dr.
Silver Spring, Md. 20904

George Chimples = \$ 100.00
5909 West 130th St.
Parma, Ohio 44130

Miss E. Batalis \$ 50.00
249 Linden St.
Manchester, N.H. 03104

Al Marland \$ 100.00
736 Brooke Rd.
Wayne, Pa. 19087

Mrs. A. Athas \$ 25.00
519 H Street
Salt Lake City, Ut. 84103

9304350034

Ken C. Jones
(no address) \$ 50.00

John Deoudes \$ 200.00
5801 Lenox Rd.
Bethesda, Md. 20817 =

Plato Truman \$ 100.00
9 Thornton St.
Biddeford, Me. 04005

Julie Fotiades \$ 50.00
1631 Valmont St.
New Orleans, La. 70115

John N. Polydouris \$ 100.00
272 Western Ave.
Albany, N.Y. 12203

Harry Magafan \$ 100.00
6109 Clearwood Rd.
Bethesda, Md. 20817

Eugene T. Rossides \$ 100.00
3666 Upton St. N.W.
Washington, D.C. 20008

Dimitrios Kaloidis \$ 500.00
7 George K. Leontarakis
P.O. Box 653
"Captain G's"
Woodbridge, N.J. 07095

Harry Pappachristus \$ 100.00
685 Columbus Ave.
Perth Amboy, N.J. 08861 =

DFL Excavating & Const. Inc. \$ 500.00
179 Wilson Rd.
Somerset, N.J. 08873

Fish & Fish Distributors \$ 100.00
375 Herbert St.
Perth Amboy, N.J. 08861

9304350035

George K. Leontarakis
P.O. Box 653
"Captain G's"
Woodbridge, N.J. 07095

\$1,000.00

Brothers Management Asso.
141 Dunbar Ave.
Fords, N.J. 08863

\$ 100.00

Peter Pappas Produce
10 Dana Estates Dr.
Parlin, N.J. 08859

\$ 100.00

M.J. Lieberman & Co.
354 Eisenhower Parkway
Livingston, N.J. 07039

\$ 250.00

M. Schacht Seafood
126 Brunswick St.
Jersey City, N.J. 07302

\$ 100.00

\$6,425.00 TOTAL

9 3 0 4 3 5 0 0 3 6

WILLIAM G. CHIRGOTIS
ARCHITECT

37 MOUNTAIN AVENUE • SPRINGFIELD, NEW JERSEY 07081-1787 • 376-3200

GREEK-AMERICANS FOR BUSH-QUAYLE

Total Receipts Deposited

\$ 1,500.00
1,300.00
550.00
225.00
2,850.00

\$ 6,425.00

Paid Outs

\$ 600.00	Hellenic Journal
550.00	Greek Star
720.00	Greek Sunday News
913.50	Hellenic Chronicle
2,400.00	H. Nea Yopkh
1,200.00	Hellenic Times
<hr/>	
\$6,383.50	Total
4.73	Bank Service Charge
<hr/>	
\$6,388.23	
\$ 36.77	BALANCE

Accounts Due & Payable
Professional services rendered

Carol A. Roessner
15 Alvin Terrace
Springfield, N.J. 07081

Professional services rendered for secretarial work
performed -----\$425.00

National Home Planning Service
37 Mountain Avenue
Springfield, N.J. 07081

Art work, photocopying, mimeographing, postage,
telephone, etc. -----\$560.00

9304350037

9304350038

DATE

10212009851 2001471112511 5 1000013000011



PLEASE ENDORSE ALL CHECKS
CHECKS AND OTHER ITEMS ARE RECEIVED FOR DEPOSIT SUBJECT
TO THE RULES AND REGULATIONS OF THIS FINANCIAL INSTITUTION
PLEASE LIST EACH CHECK SEPARATELY

DATE		10-27-88	
CURRENCY			
COIN			
1	1,000	-	
2			
3	100	-	
4			
5	100	-	
6			
7	100	-	
8			
9			
10			
11			
12			
13			
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16			
17	OCT 27 '88		
18			
19			
20			
21			
22			
23			
24			
TOTAL CHECKS			
SUB TOTAL			

TOTAL ITEMS	4
PLEASE ENTER TOTAL	1,300.00

CHECKS AND OTHER ITEMS ARE SUBJECT TO OUR GENERAL
SUBJECT TO THE RULES AND REGULATIONS OF THIS BANK

10-18/88

4

1000 -

500 -



Elizabeth, N.J. 07207

NEW ACCOUNT
Greek Americans for Bush-Grady

NEW ACCOUNT

DEPOSIT TO ACCOUNT OF

TOTAL
DEPOSITTOTAL
CHECKSSUB
TOTAL

1500 —

4:0212009851

2004.7.25

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9304350●039

A Constellation Bank

GREEK AMERICANS FOR BUSH-QUAYLE
C/O WILLIAM G CHIRGOTIS
37 MOUNTAIN AVE
SPRINGFIELD NJ 07081

DATE 10-31-88
PAGE 1

COUNT NO. 0200-471-126 BUSINESS ACCOUNT 3

HOME EQUITY CREDIT LINE-SPECIAL
INTRODUCTORY RATE OF 8% FOR FIRST
3 MOS. CALL 1-800-234-2074 TO APPLY.

FORMATION CALL PERSONAL FIN CTR-SPRINGFIELD 201-376-1442

PREVIOUS STATEMENT	CHECKS AND DEBITS	DEPOSITS AND CREDITS	CURRENT
BALANCE	NUMBER	NUMBER	BALANCE
041-88 .00	2 554.73	2 2,800.00	2,245.27

- - DAILY BALANCE SUMMARY - -				
BALANCE	DATE	BALANCE	DATE	BALANCE
1,500.00	10-27	2,250.00		
950.00	10-31	2,245.27		

- - MISCELLANEOUS DEBITS AND CREDITS - -	
AMOUNT	DESCRIPTION OF TRANSACTION
1,500.00 CR	DEPOSIT
1,300.00 CR	DEPOSIT
4.73 DR	SERVICE CHARGE

CHECKS/WITHDRAWALS POSTED-		CHECKS/WITHDRAWALS POSTED-		CHECKS/WITHDRAWALS POSTED-	
CHECK NO.	AMOUNT	CHECK NO.	AMOUNT	CHECK NO.	AMOUNT
1-25	550.00				

HELLENIC TIMES

SEE LETTER
ATTACHED

11/1/88

Issue 10/19/88
Full Page Ad
Greek Americans for Bush/Quayle

*** LAST ACCOUNT
IN THIS COLUMN ***

600.00
+ 1300.00

\$600.00

DATE

CHARGES AND CREDITS

RETURN THIS PORTION WITH PAYMENT

AMOUNT

AMOUNT ENCLOSED \$

Greek Americans for Bush/Quayle
c/o William G. Chirgottis
37 Mountain Ave
Springfield, NJ 07081

(212) 986-6881

HELLENIC TIMES
265 West 87th St
NEW YORK, NY 10024

ACCOUNT NUMBER

10/20/88

DATE

93043500042

WILLIAM G. CHIRGOTIS
ARCHITECT

37 MOUNTAIN AVENUE • SPRINGFIELD, NEW JERSEY 07081-1787 • 376-3200

FEC Exp
8/7/89 CHT

November 28, 1988

Wiley, Rein & Fielding
1776 K Street N.W.
Washington, D.C. 20006

Att: Mr. Trevor Potter

RE: Greek-Americans
for Bush Campaign

Dear Mr. Potter:-

Enclosed herewith find copy of the "Bush-Quayle" advertisement that appears on Page 4, of the November 1st, 1988, issue of the "Pilgrimage", including the unpaid bill in the amount of \$800.00.

This makes a final totaling of outstanding unpaid bills to be paid in the amount of \$1,785.00.

Sincerely,


William G. Chirgotis

FEC 817
8/7/89 CH

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

December 2, 1988

WRITER'S DIRECT DIAL NUMBER

(202) 429-7366

Mr. William G. Chirgotis
37 Mountain Avenue
Springfield, New Jersey 07081

Dear Mr. Chirgotis:

Thank you for your letter and enclosed materials detailing activities of the Greek Americans for Bush Coalition during the election which are the subject of MUR 2757.

As I informed you on the telephone, these activities were not authorized by Bush-Quayle 88. In fact, every Coalition was expressly forbidden to expend any funds without approval of the appropriate campaign budget officers, and no one associated with Bush-Quayle 88 had any authority to seek or accept contributions. In that regard, I refer you specifically to the memo of October 12, 1988 from Ceci Cole McInturff to all Coalition Directors. Accordingly, the Treasurer of Bush-Quayle 88 has determined that the Campaign will not pay for any unauthorized disbursements, and will not reimburse any agents of the Campaign for any expenditures they may have made in violation of express campaign instructions.

Accordingly, I am returning to you all of the bank statements, advertisements, bills, invoices, correspondence, etc. which you forwarded to me concerning your fundraising activities and expenditures.

Should you have any further questions concerning the partition of Bush-Quayle 88 in this matter, please do not hesitate to phone.

Sincerely,


Trevor Potter

TP/co
Enclosures

9304350044

ORIGINAL

TRANSCRIPT OF PROCEEDINGS

0603937
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 SEP -5 AM11:10

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ELECTION COMMISSION

IN RE:

M U R 2767

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 SEP -5 PM12:12

-----X
:
:
:
:
:
:
-----X

DEPOSITION OF CHARLES B. ZOGBY

Washington, D. C.

Wednesday, August 9, 1989

ACE-FEDERAL REPORTERS, INC.

Stenotype Reporters
444 North Capitol Street
Washington, D.C. 20001
(202) 347-3700
Nationwide Coverage
800-336-6646

9304350045

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ELECTION COMMISSION

In re

M U R 2767

X
:
:
:
:
:
:
:
X

Washington, D. C.

Wednesday, August 9, 1989

Deposition of:

CHARLES B. ZOGBY

called for examination pursuant to notice, in the office of the Federal Election Commission, 999 "E" Street, Northwest, Washington, D.C., commencing at 9:55 a.m., before James D. Hall, CSR, a Notary Public for the District of Columbia, when were present on behalf of the respective parties:

Reported by James D. Hall

ACE-FEDERAL REPORTERS, INC.
(202) 347-3700
(800) 336-6646

93043500046

APPEARANCES:

For the Federal Election Commission:

KEITH V. MORGAN, ESQ.
COLLEEN MILLER, ESQ.
Office of General Counsel
Federal Election Commission
999 "E" Street, Northwest
Washington, D. C. 20463

For the Deponent:

RICHARD MAYBERRY, ESQ.
Of: Richard Mayberry & Associates
888 Sixteenth Street, Northwest
Fifth Floor
Washington, D. C. 20006

-o000o-

C-O-N-T-E-N-T-S

WITNESS: CHARLES B. ZOGBY

EXAMINATION BY:	PAGE
Mr. Morgan	4

-o000o-

93043500047

E-X-H-I-B-I-T-S

EXHIBIT:

FOR IDENT.

FEC Deposition Exhibits:

Exhibit No. 1	44
handwritten memo Zogby to Chirgotis 10-12-88	
Exhibit No. 2	56
ltr Chirgotis to "Dear Hellene" undated	
Exhibit No. 3	70
memo McInturff to coalition leaders 10-12-88	
Exhibit No. 4	84
Sarafa/Zogby to "Dear Arab American Republican 10-19-88	
Exhibit No. 5	125
ltr Atiyeh to "Dear Fellow Arab American" 1-4-87	
Exhibit No. 6	160
Election '88 Report May 1988 on AARF letterhead	
Exhibit No. 7	161
Election '88 Report #6 April 1988, AARF letterhead	
Exhibit No. 8	163
invitation to reception held 8-15-88	

-o000o-

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P-R-O-C-E-E-D-I-N-G-S

Thereupon

CHARLES B. ZOGBY

was called as a witness, and after being first duly sworn
by the Notary, was examined and testified as follows:

EXAMINATION BY COUNSEL FOR THE COMMISSION

BY MR. MORGAN:

Q Good morning. My name is Keith Morgan, and
Colleen Miller is sitting next to me. Ms. Miller and I
represent the Federal Election Commission in this matter

This deposition is being taken pursuant to a
Federal Election Commission subpoena issued under Section
437-G of title two of the United States Code. The statute
provides that the confidentiality of this investigation
will be maintained until the Commission decides to close
this file. The Commission has civil jurisdiction over the
Federal Election Campaign Act of 1971 as amended. All
objections except as to form and foundation will be
reserved until trial.

Mr. Zogby, are you represented by an attorney
here today?

A Yes.

1 Q Could you identify him.

2 A Richard Mayberry.

3 Q I don't know if you've been deposed before, but
4 in this one I'm going to ask you a series of questions to
5 find out what you know about the facts giving rise to the
6 matter under review. This deposition is being recorded by
7 a reporter, so make sure all your answers are verbal, not
8 gestures such as nodding your head or shaking your head.
9 If you do not hear a question, say so and I'll repeat it.
10 Okay?

11 A Okay.

12 Q If you don't understand a question, say so and
13 I'll rephrase it. All right?

14 A All right.

15 Q If you feel that an earlier answer you gave was
16 inaccurate or incorrect, say you want to supplement or
17 correct your earlier answer and you'll be allowed to do so.
18 If you want to stop to use the rest room or stretch your
19 legs or get a cup of coffee or glass of water, say so and
20 you'll be allowed to. If you find you're tired or confused
21 and want to take a short break or even recess for the day,
22 please say so.

9304350050

1 If you don't understand the question, will you
2 tell me you don't understand?

3 A Yes.

4 Q If you don't know an answer will you tell me you
5 don't know it?

6 A Yes.

7 Q So we agree you'll only answer questions that
8 you understand and that you know the answer to.

9 A Yes.

10 Q Do you understand the instructions I've just
11 given you?

12 A Yes.

13 Q Could you state your name for the record.

14 A Charles B. Zogby.

15 Q Would you spell your last name for the record.

16 Q Z-o-g as in George, b as in boy, y.

17 Q Would you state your present address.

18 A 1301 North Ode Street, O-d-e, number 110,
19 Arlington, Virginia 22209.

20 Q And your present occupation?

21 A Legislative assistant.

22 Q To who?

9304350051

1 A Congressman Tom Ridge.

2 Q How long have you been at your present job?

3 A The first of the year, January 1st, '89.

4 Q What was your previous position?

5 A I was with the Arab American Institute.

6 Q How long were you there?

7 A From April of 1985.

8 Q Until January?

9 A Until January -- January 1, 1989.

10 Q What was your position at the Arab American
11 Institute?

12 A Assistant for programs.

13 Q What did that involve?

14 A Essentially the institute was -- got -- I guess
15 its goal was to get Arab Americans involved in politics. I
16 assisted in that through various programs that they ran,
17 organizing get-out-the-vote-type efforts, voter
18 registration, things of that nature.

19 Q Did you supervise any employees in doing that?

20 A No, I did not.

21 Q What type of get-out-the-vote program did you
22 do, for instance?

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1 A Well, I guess just to offer an example, if there
2 were elections in any given locale, we would seek to get
3 Arab Americans in that community to -- encourage them to
4 register to vote.

5 Q What locations?

6 A Yonkers New York; Dearborn, Michigan; various
7 other communities.

8 Q Okay. Could you state your age for the record.

9 A Twenty-seven.

10 Q And could you describe your educational
11 background.

12 A Went to college, St. Lawrence University, and
13 I'm presently a law student at George Mason University.

14 Q What was your major at St. Lawrence?

15 A Economics.

16 Q Did you take any courses in politics, political
17 science?

18 A No, I did not.

19 Q Did you take any courses that involved election
20 law?

21 A No, I did not.

22 Q Have you taken any courses at George Mason

9304350053

1 involving election law?

2 A No.

3 Q What year are you at George Mason?

4 A I'm going into my third year as an evening
5 student

6 Q Congratulations

7 What did you do to prepare for this deposition
8 today?

9 A I guess I just reviewed the -- reviewed the
10 materials that we had submitted to you all.

11 Q You reviewed what documents?

12 A The interrogatories, the documents that I had
13 submitted.

14 Q Any other documents?

15 A No.

16 Q Did you discuss this deposition with anyone?

17 A With my attorney, Mr. Mayberry.

18 Q Anyone else?

19 A No.

20 Q When did you meet with counsel about this
21 deposition?

22 MR. MAYBERRY: I'm going to object. I think

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1 that's privileged information in terms of us meeting and
2 what was said in the meetings.

3 MR. MORGAN: I'm not asking what was said. I
4 just want to know when you met with counsel.

5 THE WITNESS: I can't give you an exact date. I
6 did meet with him. I don't know the dates. I can't
7 remember the dates.

8 BY MR. MORGAN:

9 Q Within the last two weeks?

10 A Yes.

11 Q How many times would you say you met with
12 counsel?

13 A Once.

14 Q Did you meet in his office?

15 A Yes.

16 Q How long was that one meeting?

17 MR. MAYBERRY: I'm going to object and I'm going
18 to instruct the witness not to answer the question. As I
19 said, we met to discuss this as any client would with his
20 attorney. The questions are going into a privileged area.

21 MR. MORGAN: I'm not asking the substance of the
22 conversation, just the time, how long the meeting lasted.

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1 MR. MAYBERRY: That's as privileged as anything
2 else that you want to ask in terms of contact.

3 MR. MORGAN: It's not the content of the
4 meeting, it's the length of meeting.

5 MR. MAYBERRY: It's pretty close.

6 MR. MORGAN: I don't think so.

7 BY MR. MORGAN:

8 Q How long did the meeting --

9 MR. MAYBERRY: Again, I've instructed my client
10 not to answer that question or any further questions in
11 terms of meetings between himself and me.

12 MR. MORGAN: Again, for the record, I'm not
13 asking the substance of the meeting. I'm asking the length
14 of time. It would go to the witness' preparation for this
15 deposition.

16 MR. MAYBERRY: Why don't you go to the next
17 question.

18 (There was had a discussion between
19 the witness and counsel, which was
20 out of the hearing of the court
21 reporter.)

22 BY MR. MORGAN:

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1 Q I'm going to ask again, how long were the
2 meetings with your counsel?

3 MR. MAYBERRY: Well, I've instructed him not to
4 answer those questions

5 BY MR. MORGAN:

6 Q Mr. Zogby, could you answer the question?

7 A On the advice of my attorney I'm not going to
8 answer that question.

9 Q Okay. Have you been involved in political
10 campaigns prior to 1988?

11 A Yes

12 Q Which ones?

13 A Reagan-Bush '84.

14 Q What was the nature of that involvement?

15 A I was a volunteer.

16 Q What types of things did you do for Reagan and
17 Bush in '84?

18 A I was a volunteer for the ethnic voters
19 division.

20 Q What did you do with the Ethnic Voters Coalition
21 in '84?

22 A Xeroxed papers, stuffed envelopes.

9304350057

1 Q So general clerical type stuff?

2 A Yes.

3 Q Did you have an office?

4 A No.

5 Q How long did you work for them in '84, for
6 Reagan and Bush in '84?

7 A From August, '84, to November, '84.

8 Q How many hours a week?

9 A About 40.

10 Q Were you involved in any other campaigns?

11 A No.

12 Q So how did you get involved with the Bush-Quayle
13 campaign in 1988?

14 A My -- the person who was I guess charged with
15 organizing the ethnic voters segment of the Bush campaign
16 had met with my boss at -- the boss of the executive
17 director of the ethnic voters division of the Reagan-Bush
18 campaign, and I attended that meeting and volunteered my
19 services.

20 Q Who was the representative from the Bush-Quayle
21 campaign that got in touch with you? What was his name?

22 A Mark Holman.

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1 Q What was his title?

2 A He was deputy director, National Voter
3 Coalition. I believe that was his title.

4 Q He met with your supervisor, who -- it was your
5 supervisor?

6 A No. He met with the former director of the
7 ethnic voters section of the Reagan-Bush campaign

8 Q Who was that person?

9 A George Salem.

10 Q Did Mr. Salem have a position with the
11 Bush-Quayle campaign?

12 A No, he did not.

13 Q Is he associated with the Arab American
14 Institute?

15 A I believe he is a board member.

16 Q Of the --

17 A Of the AAI.

18 Q When did this meeting occur?

19 A To the best of my recollection that would have
20 been in May of 1988.

21 Q In May of 1988 you met with Mark Holman, George
22 Salem, and yourself?

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1 A Yes.

2 Q Was anybody else there?

3 A Mark Valenti.

4 Q What is his title?

5 A He was with the RNC. I don't know his title.

6 Q The R and C?

7 A Republican National Committee.

8 Q What was discussed at this meeting?

9 A Just how some of the activities that the ethnic
10 voters in '84 had done, how the program worked.

11 Q What else?

12 A That's it, how the program worked in '84, what
13 sort of things -- what sort of activities we did.

14 Q Did they discuss 1988 and programs for 1988?

15 A Not -- not to my recollection, no.

16 Q So after this May, 1988 meeting when was your
17 next involvement or contact with the Bush-Quayle campaign?

18 A Following the meeting I contacted Mark Holman
19 and offered to volunteer.

20 Q When did you contact him? Right after the
21 meeting?

22 A Right after the meeting. I believe I called him

9304350060

1 after I got back to my office after the meeting.

2 Q What was his response to your offer to
3 volunteer?

4 A He said he'd be glad to have my help.

5 Q So what was the next thing you did?

6 A (No response)

7 Q Did you meet with Mr. Holman?

8 A There was a subsequent meeting. I don't
9 remember when it was, though. He said that he would -- he
10 would contact me when, you know, he was starting to get
11 things together

12 Q When did he contact you?

13 A It was shortly -- shortly after that first
14 meeting.

15 Q Still in May? Still in May, '88?

16 A Possibly. I'm not -- I'm not very clear on the
17 dates.

18 Q Were you still working at the Arab American
19 Institute --

20 A Yes, I was.

21 Q -- when you contacted him? And when would you
22 say you started really to volunteer for the Bush-Quayle '88

9304350061

1 campaign?

2 A It was probably in July.

3 Q In July?

4 A (Witness nods)

5 Q What part of July?

6 A Early part.

7 Q What did you start to do then?

8 A We -- we just had -- we had a series of -- of
9 meetings to I guess put our plan together, if you will, or
10 I guess what things that we had wanted, we would like to do
11 during the campaign, and we just sat -- we met and
12 discussed some of the things that we could do.

13 Q Where did you meet?

14 A I believe we met at -- at the Bush campaign
15 headquarters.

16 Q Where at?

17 A That's on 15th Street. I forget the exact
18 number.

19 Q Here in Washington?

20 A Yes. Yes.

21 Q So when was this first meeting, series of
22 meetings at the Bush-Quayle headquarters?

93043500062

1 A In July.

2 Q The early part of July?

3 A Yes.

4 Q Who attended the meetings?

5 A It was myself, Mark Holman, Mark Valenti, Myron
6 Wyslyk.

7 Q Would you spell the last name?

8 A I don't know how to spell it

9 Q What was his title?

10 A He worked for the Coalition of American
11 Nationalities, as the ethnic voter division came to be
12 known.

13 Q Was anyone else at these meetings?

14 A Andrew Falkewicz and Ava Netarowicz.

15 Q What was Mr. -- can you spell his last name?

16 A No, I don't know how to spell that, either.

17 Q What was his title?

18 A He also worked for the Coalition of American
19 Nationalities

20 Q Did he have a title?

21 A Director, I guess.

22 Q He was the director?

9304350063

1 A I'm -- there were four directors of the
2 coalition. He was one of them.

3 Q Could you name the four directors?

4 A Myron -- Myron Wyslyk, Ava Netarowicz, Andrew
5 Falkewicz, and myself.

6 Q You were a director?

7 A Yes.

8 Q What was your exact title?

9 A Director, Coalition of American Nationalities

10 Q What were your responsibilities?

11 A I was mainly responsible for putting together
12 the Coalition's weekly newsletter and in sending letters to
13 members of the board of directors of ethnic organizations.

14 Q Let's go back to these meetings, this series of
15 meetings you had with the directors. How often did you
16 meet?

17 A I think we were meeting once or twice a week.

18 Q How long would the meetings last?

19 A They differed, differing times. Sometimes very
20 short, sometimes a couple hours.

21 Q So what was the shortest one?

22 A Maybe an hour.

93043500064

1 Q And the longest one, two hours?

2 A Three or four hours.

3 Q Three or four hours?

4 A Yeah.

5 Q What would you say the average of these meetings
6 was?

7 A Two hours.

8 Q So what types of things did you discuss at these
9 meetings?

10 A We discussed what we would like our -- what we
11 would like to be able to do during the campaign.

12 Q Which was what?

13 A As far as programs were concerned.

14 Q What types of programs?

15 A The newsletter that I prepared was something
16 that we had discussed early at the meetings. The idea of
17 sending letters to members of the board of directors, my
18 other task. Those were the types of things we discussed.

19 Q What types of things went into the newsletter?

20 A Where George Bush stood on the issues, issues of
21 concern to ethnic -- ethnic Americans. If Bush had made a
22 stop at an ethnic parade or something like that, we would

9304350065

1 try to enclose a picture or a little blurb about that.

2 Q So this must have been a major task, this
3 newsletter.

4 A It wasn't a major task. It was something that I
5 did every week and it was usually about -- you know, I did
6 it once a week.

7 Q How much time did you spend on it?

8 A Probably a day, eight hours or so.

9 Q Did you work on it by yourself?

10 A Yes.

11 Q So how many people received the newsletter?

12 A We had started I guess with a list of about 400
13 or so, a couple hundred, and by the end probably about a
14 thousand people were receiving it.

15 Q How did you get the list of people? How did you
16 get the names of the people?

17 A People would write in, ethnic people of various
18 nationalities would write in wanting to volunteer for
19 George Bush or get involved in the campaign, and we would
20 add them to the mailing list. States were putting together
21 their own coalitions of ethnic voters, and they would in
22 turn send those names once they got them, and we would add

9304350066

1 them to the list.

2 Q So were you responsible for gathering the names
3 and putting them on the mailing list?

4 A Yes

5 Q Were you still working at the Arab American
6 Institute?

7 A I was putting in some hours there, yes.

8 Q How many hours were you putting in at
9 Bush-Quayle headquarters?

10 A About 35, 40 hours.

11 Q Thirty-five or forty hours a week?

12 A Yes.

13 Q Did your hours increase as it got closer to the
14 election?

15 A No.

16 Q So it remained pretty steady?

17 A Yes.

18 Q Were you still in law school?

19 A Yes.

20 Q Did you work anywhere else?

21 A I continued to do some work for the AAI.

22 Q So you were working for the AAI, going to law

9304350067

1 school, and working 35, 40 hours a week for the Bush-Quayle
2 campaign?

3 A Yes.

4 Q You were a pretty busy guy.

5 A Yes.

6 Q Your title at the Bush-Quayle campaign was
7 director of -- what was your exact title?

8 A Director, Coalition of American Nationalities.

9 Q Did you have an office at the Bush-Quayle
10 headquarters?

11 A I had a desk.

12 Q Did you have a secretary to help you with this?

13 A No.

14 Q Did you supervise anybody else helping put the
15 newsletter together?

16 A I would have -- there would be volunteers that
17 would help. I guess I would say I supervised them.

18 Q How many?

19 A One, two at most.

20 Q Do you recall their names?

21 A No.

22 Q You can't recall anybody that helped you with

9304350068

1 the letter?

2 A No.

3 Q Was it always the same one or two people?

4 A No. It was often times different people.

5 Q So what types of things would you direct them to
6 do?

7 A As the names came in for these mailing lists,
8 they would need to be put on labels. We would ask them to
9 type labels or stuff envelopes, Xerox. Xerox things.

10 Q If you were putting together this newsletter and
11 you needed paper or you needed work done on the word
12 processor --

13 A Uh-huh.

14 Q -- what did you do?

15 A I typed it onto the word processor.

16 Q And if you needed paper and material to
17 distribute the newsletter?

18 A All I had to do was type it. It was -- the
19 campaign had set up a mechanism where you just submitted it
20 and they had a whole other staff to Xerox it.

21 Q So you were authorized to have access to the
22 staff that could Xerox and prepare the newsletter?

9304350069

1 A No. I just submitted it to -- to our deputy
2 director.

3 Q Who was that?

4 A Mark Holman.

5 Q He reviewed it?

6 A He reviewed it and then I just had to -- and
7 then he submitted it to the -- to the person in the
8 campaign responsible for coordinating the Xeroxing, and
9 that whole procedure.

10 Q How much would you say it cost a week to put
11 this newsletter together?

12 MR. MAYBERRY: If you know.

13 THE WITNESS: I don't know.

14 BY MR. MORGAN:

15 Q Well, I will instruct you, answer only if you
16 know. If you don't know, just go ahead and say so.

17 A I don't know.

18 Q Would you say it cost a thousand dollars?

19 A I couldn't even begin to guess.

20 Q Did you have a telephone at Bush-Quayle
21 headquarters?

22 A Yes, I did.

9304350070

1 Q So if I wanted to call you, I would call you at
2 Bush-Quayle?

3 A Yes.

4 Q So you were listed on a telephone directory?

5 A Yes.

6 Q As having a private line?

7 A No.

8 Q Where was your phone line?

9 A It was on my desk, but there was a main
10 secretary who transferred calls in. You had an extension.

11 Q So how many total volunteers worked with the
12 ethnic coalition?

13 A It varied. Sometimes we'd have one or two
14 people helping us, sometimes we'd have more.

15 Q Say in the early part of July when you started,
16 how many people?

17 A I think we had maybe one at that time.

18 Q And August?

19 A Probably one or two.

20 Q Then --

21 A It depended on -- you know, it depended on the
22 work that needed to get done.

9304350071

1 Q Now, as the election came closer were there more
2 people there?

3 A Yes.

4 Q How many by November?

5 A Again, it would vary on the work that needed to
6 be done that day

7 Q Were there a number of other people there
8 working as many as hours as you?

9 A Yes

10 Q How many other?

11 A In the campaign or in the ethnic voters?

12 Q First in the ethnic voters section.

13 A There were the four directors.

14 Q And they were working how many hours?

15 A I guess the same amount, 40 hours a week. I
16 didn't keep track of their time.

17 Q And the whole campaign, how many volunteers?

18 A I'm not sure. A number of volunteers.

19 Q Could you guess how many?

20 A I couldn't begin to guess.

21 Q You mentioned talking with the chairman of the
22 coalition of the various coalitions as one of your

9304350072

1 responsibilities to prepare the newsletter, and what else
2 did you do?

3 A I sent letters to -- letters signed by -- that
4 were eventually signed by an autopen, George Bush letters
5 to board members of ethnic organizations.

6 Q What were these ethnic organizations?

7 A The Polish American Congress, the
8 Czechoslovakian Fraternity Society. Various ethnic
9 fraternal organizations.

10 Q How many did you contact?

11 A I think there was 24, 25.

12 Q How often did you mail stuff to them?

13 A It was a one-time mailing to each -- each board,
14 each board of the organization.

15 Q Did you send them anything else?

16 A No.

17 Q You sent them the newsletter?

18 A No.

19 Q Did you have any other contact with the board
20 members of these organizations?

21 A No.

22 Q Let's go back to how this Coalition of American

9304350073

1 Nationalities is set up.

2 A Uh-huh.

3 Q You identified four directors. Was anybody else
4 involved?

5 A No. Those were the primary -- primary people.

6 Q Could you describe the structure.

7 A The Coalition of American Nationalities,
8 originally as it was announced there were 90 -- 90-plus
9 ethnic Americans who I guess you could call the original
10 Coalition of American Nationalities, and these were
11 prominent ethnic Americans who supported the vice president
12 and agreed to give their -- their name to become members of
13 the coalition.

14 Q What were their titles?

15 A It varied. Some were -- there were -- it was
16 structured as honorary chairman, chairman, vice chairman,
17 and co-chairman.

18 Q Of the Coalition of American Nationalities?

19 A Of the Coalition of American Nationalities.

20 Q For different ethnic groups or was it --

21 A It was -- it was just a coalition, but a number
22 of the members were of various ethnic backgrounds.

9304350074

1 Q Was the coalition broken down, was it like a
2 Polish group and a Chinese group and they had their own --

3 A No. There was the coalition and there were the
4 honorary chairs, the co-chairs, and the vice chairs.

5 Q Of the whole thing?

6 A Of the whole thing, yes

7 Q These 90 individuals -- about 90 of them?

8 A Yes, I believe so.

9 Q Did you have any contact with them?

10 A Yes. Some of them, yes.

11 Q What type of contact?

12 A Well, originally we -- we -- when we put the
13 list together and the names were approved we had to call
14 each individual to get their consent to be a part of the
15 coalition.

16 Q So that you got in touch with them?

17 A I called some of them, yes.

18 Q Which ones did you call?

19 A I don't remember. We just broke up the list
20 between the four of us and had to call some of them.

21 Q How many did you call?

22 A Probably a fourth of the list.

9304350075

1 Q Which would be 25?

2 A I guess so, yeah. If my math is right.

3 Q Did you give them any type of instructions, what
4 they were supposed to do?

5 A We had a -- a written -- I guess a written
6 script, if you will, and "Hello, my name is," "I'm calling
7 from the Bush campaign, and would you like to become a
8 member of the Coalition of American Nationalities?"

9 Q How did you represent yourself to them?

10 A I just said my name and that I was with the Bush
11 campaign.

12 Q Did you give your title?

13 A I said I was -- I probably said I was with the
14 Coalition of American Nationalities.

15 Q What was the rest of the script?

16 A Just if they would, you know -- they would agree
17 to lend their name to become part of the Coalition of
18 American Nationalities and, you know, some boilerplate
19 about supporting the vice president.

20 Q Did you ask for them to do anything?

21 A Outside of maybe lending their name, you know,
22 mobilizing the ethnic community or something like that.

9304350076

1 Again, boilerplate, supporting the vice president.

2 Q Did you give them any instructions, suggestions
3 on how they could go about supporting the vice president?

4 A No.

5 Q Did they ask any questions?

6 A Some did

7 Q What types of questions?

8 A What is the coalition, you know, who else is a
9 member, things of that nature.

10 Q Did they call you back later on for information?

11 A There -- there may have been a call from -- from
12 someone saying, you know, "I've got a person who wants to
13 volunteer for the campaign," something like that. I don't
14 remember a lot of follow-up calls, though, or return calls.

15 Q Did they ever call for any other type of advice?

16 A Not that I know of, no.

17 Q Did you mail them any information?

18 A They received the newsletter.

19 Q Anything else?

20 A Well, there was a couple memos that we were
21 directed to send out to them. One was a do's and don'ts.
22 They also got a 60-day campaign manual, I guess it was.

9304350077

1 Q Who instructed you to send out the memo?

2 A That would be the director of the National Voter
3 Coalitions.

4 Q Who was that?

5 A Ceci Cole McInturff

6 Q What was her title again?

7 A Director, National Voter Coalitions. I believe
8 that's it.

9 Q What was her relationship to --

10 A She was the head of the voter coalitions. She
11 was the director of the voter coalitions.

12 Q So she was your contact person from the
13 Bush-Quayle campaign?

14 A No. My immediate contact was Mark Holman, who
15 was the deputy director.

16 Q So what was the relationship between your
17 organization and the Bush-Quayle campaign?

18 A The Coalition of American Nationalities? It was
19 one of the voter groups in the Bush -- Bush-Quayle
20 campaign.

21 Q You said this memo dealt with do's and don'ts.
22 What type of do's and don'ts?

9304350078

1 A I guess -- my understanding was that it was --
2 it was prepared by the campaign, things that they could do
3 legally and could not do, just giving them some guidance
4 on, you know, what they should be aware of, I guess.

5 Q Like federal election laws?

6 A Probably, yes.

7 Q Who prepared the memo?

8 A I don't know.

9 Q Did you read it?

10 A Yes.

11 Q Do you remember any specific things?

12 A I don't really recall that specifically.

13 Q What was the second thing? A 60-day brochure?

14 A Sixty-day manual.

15 Q Manual?

16 A Yes.

17 Q What did that say?

18 A It -- you know, it said things that they could
19 do like, you know, speak in front of groups for the vice
20 president, things that they could do, you know, call in to
21 radio talk shows supporting the vice president, things of
22 that nature.

9304350079

1 Q Did it tell them to raise funds?

2 A Not to my knowledge.

3 Q About when did this go out?

4 A Thirty days before the end of the election.

5 Q It was a 60-day brochure?

6 A Yes.

7 Q So it was running a little late.

8 A Yes, it was.

9 Q Who did you get that from?

10 A I don't know who prepared it. We were just --
11 in fact, I don't even think we sent them out. We just gave
12 -- gave -- gave a list of our coalition members and it was
13 -- it was sent out.

14 Q Gave the list to who?

15 A Mark Holman probably gave the list to -- to Ms.
16 McInturff. I don't know.

17 Q Did you prepare the list? Was this the list you
18 prepared?

19 A Well, this was the Coalition of American
20 Nationalities list, the one that was originally -- the 90-
21 plus list that I mentioned earlier, the original Coalition
22 members

9304350080

1 Q Did it go out to the mailing list?

2 A No, just the original Coalition members.

3 Q Do you know who prepared the brochure?

4 A No.

5 Q Were you involved in the preparation of the
6 brochure?

7 A No, I was not

8 Q Would you say you could authorize expenditures
9 for the Bush-Quayle campaign?

10 MR. MAYBERRY: He's already answered that
11 question in the negative.

12 THE WITNESS: No.

13 BY MR. MORGAN:

14 Q Did you have access to any of the funds of the
15 Bush-Quayle campaign?

16 A No.

17 Q Petty cash?

18 A No.

19 Q When you were preparing your newsletter and you
20 were on the word processor and you needed more paper, were
21 you authorized to get more paper?

22 A Yes.

9304350081

1 Q How often did you do that?

2 A I don't know. Whenever I needed it.

3 Q So whenever you needed paper or any type of
4 office supplies or material --

5 A Supplies, yes

6 Q So would you get it?

7 A You had to go down and request it at the supply
8 -- supply room.

9 Q How did you do that?

10 A I went down and requested it at the supply room.

11 Q Did you sign anything? They just knew you and
12 would give it to you?

13 A I don't remember signing anything.

14 Q Do you consider yourself an officer of the
15 Bush-Quayle campaign?

16 A No.

17 Q Do you know William Chirgotis?

18 A Yes.

19 Q How did you meet him? How do you know him?

20 A I never met him. I believe he was one of the --
21 he was an honorary chair, I believe, of the Coalition.

22 Q Which coalition? Which group?

9304350082

1 A The Coalition, the original 90.

2 Q Did you attend any meetings with --

3 A No.

4 Q How many times did you talk to him on the phone?

5 A A couple times, maybe. I can't recall the exact
6 times. It was a few times.

7 Q Five?

8 A I don't know that it was that many.

9 Q Could it have been five?

10 A Maybe.

11 Q What did you say to him on the phone?

12 A I believe he was one of -- I'm not certain. He
13 may have been one of my calls asking him to join the
14 Coalition.

15 Q Did he ever call you?

16 A Not to my knowledge.

17 Q Do you recall any of the other conversations any
18 of the times you called him?

19 A I may have called -- he was a board member of I
20 believe HEPPA or one of the Greek -- Greek organizations
21 that we were sending these letters to, and I quite possibly
22 called him to get the list of the board members.

9304350083

1 Q Did you send him the newsletter?

2 A Yes.

3 Q Would he have gotten a copy of the 60-day
4 brochure?

5 A Yes.

6 Q The memo of do's and don'ts?

7 A Yes.

8 Q Would you have sent any of that to him? Would
9 you have sent any of that stuff to him?

10 A I don't know that we -- I don't know that I
11 mailed any of that. I didn't mail the manual and I didn't
12 mail the newsletter. I prepared the newsletter.

13 Q Did you ever mail anything to Mr. Chirgotis?

14 A I don't know. Not that I know of.

15 Q Did you attend the meeting at the National Press
16 Club here in Washington, D. C., for coalition leaders in
17 August, 1988?

18 A Yes.

19 Q What went on at this meeting?

20 A The vice president announced his Coalition of
21 American Nationalities.

22 Q So Vice President Bush was at this meeting?

9304350084

1 A Yes.

2 Q How many people were in attendance?

3 A A couple hundred.

4 Q Were there any other speakers?

5 A There was one, Frank Piasecki spoke --

6 Q Who is he?

7 A He was also a member of the Coalition.

8 Q What was his title?

9 A Chair.

10 Q Vice President Bush, Mr. Piasecki, who else?

11 A Senator D'Amato, and there was also a Lithuanian
12 woman or a Latvian woman, Vive or Viva. I don't remember
13 her full name.

14 Q Were there any like formal presentations?

15 A I think Vive presented the vice president with a
16 letter from her brother or something in Latvia or
17 Lithuania.

18 Q What did the letter --

19 A I don't know. It was just like a framed letter
20 that she said "I want to give this to you."

21 Q Was there any type of -- I guess by formal
22 presentation I mean was there any kind of instruction, any

9304350085

1 kind of marching orders for all the troops here in
2 Washington?

3 A No.

4 Q Were there any other parties or anything related
5 to it?

6 A There was a reception at the Capitol Hill Club
7 later on after the press announcement.

8 Q Who attended the reception?

9 A Members of the Coalition, members of Congress.

10 Q How many people were there?

11 A A couple hundred.

12 Q Were there presentations and speeches there?

13 A There was a couple -- there was some members
14 gave brief remarks.

15 Q What was the nature?

16 A Just "Thank you for being here," you know,
17 things like that.

18 Q Do you recall, was Mr. Chirgotis at this
19 meeting?

20 A Not to my knowledge.

21 Q Did you meet the ethnic coalition leaders that
22 you had spoken with on the phone at this meeting?

9304350086

1 A Yes, some of them.

2 Q Did you talk to them?

3 A Some of them, yes

4 Q What did you discuss with them?

5 A I don't know. Just, you know, "Hi, how are you,
6 glad you could make it."

7 Q Did you give them any information?

8 A I'm not sure what you mean by "information."

9 Q Did you give them any material? Did you give
10 them the newsletter? Did you give them a business card?

11 A We had a packet of material prepared for the
12 press announcement at the press club, and that just simply
13 contained a letter from the vice president thanking them
14 for being there, and a brochure, a Bush -- you know, Bush
15 for President brochure.

16 Q What else?

17 A A pen with the vice president's signature on it.

18 Q Did you prepare the letter or the information,
19 did you put the package together?

20 A I probably helped stuff and put the packages
21 together. I didn't prepare any of the materials, though.

22 Q Did you distribute it?

9304350087

1 A No.

2 Q When you met with people there how did you
3 represent yourself?

4 A My name, Charles Zogby, "I'm with the Coalition
5 of American Nationalities."

6 Q Did you tell them your title?

7 A No, not that I remember.

8 Q Did you talk up the Coalition, tell them what
9 great things you guys were going to do?

10 A I -- I don't know. I mean I didn't talk it up
11 in terms of a sales pitch.

12 Q A subtle discussion?

13 A No, nothing along that line.

14 Q Did you tell them to get back if there was
15 anything else? If they needed information, were they to
16 call you?

17 A Not that I remember, no.

18 Q Did anything else happen during the period of
19 this reception?

20 A No.

21 Q How long did the presentations and speeches at
22 the National Press Club last?

9304350088

1 A That was probably a couple hours.

2 Q How long was the reception?

3 A A couple hours.

4 Q Okay. I'm going to ask the reporter to mark
5 this FEC exhibit one. It's one page. And I'm showing FEC
6 exhibit one to Mr. Zogby and his attorney, Mr. Mayberry.

7 (The document referred to above was
8 marked as FEC Deposition Exhibit No.
9 1 for Identification.)

10 BY MR. MORGAN:

11 Q Can you identify FEC exhibit one?

12 A It's a letter to Bill Chirgotis signed by me.

13 Q So is it in your handwriting?

14 A Yes.

15 Q Is that your signature at the bottom?

16 A Yes.

17 Q Why did you send this letter?

18 A I'm sending him 250 pieces of Greek American
19 Committee letterhead with envelopes

20 Q Do you recall preparing and sending this package
21 to Mr. Chirgotis?

22 A I do recall this now, yes.

9304350089

1 Q Were you authorized to send out stationery and
2 letterhead to the Coalition chairmen and members?

3 A I wasn't authorized.

4 Q Why did you do it?

5 A Well, when I say I wasn't authorized, there was
6 only a couple committees, and I thought I had sent -- I
7 know that we had done Greek American Committee letterhead.
8 I had thought I sent it all to another member of the Greek
9 committee, and I'd forgotten that I sent it to Mr
10 Chirgotis.

11 Q Who was the other member?

12 A Ted Perros, Dr. Ted Perros.

13 Q When did you send the letterhead to him?

14 A Probably about the same time I sent this to Mr.
15 Chirgotis.

16 Q About how much did you send him?

17 A Probably an equal amount. I'm not positive.

18 Q Did you send this letterhead out to anyone else?

19 A We had Armenian letterhead, and I'm not sure
20 I'm not sure what else. We had a couple other letterheads,
21 but I'm not sure who the groups were.

22 Q Did you send the letterhead out to these other

9304350090

1 groups?

2 A There was only a couple of them, and I think I
3 did, yes.

4 Q Did you send some to this Armenian group?

5 A Yes.

6 Q How much did you send them?

7 A I don't know.

8 Q Was it as much as this? This was 250. Was it --

9 A It was probably around there.

10 Q Was it any individual with the Armenian
11 coalition?

12 A Yes. Barry Zorthian.

13 Q Did you deal with him a lot?

14 A Yes.

15 Q What was the nature of your relationship with
16 him?

17 A Barry would -- Barry lived in D. C., so he
18 stopped by the office quite a bit, would give us clippings
19 of articles that appeared in the Armenian newspapers. He
20 was -- he was actually very active in doing the sort of
21 columns and op-ed pieces, things of that nature.

22 Q So did you meet with him a lot? How many times?

9304350091

1 A I probably -- I probably saw him once or twice a
2 week.

3 Q How long were your meetings with him?

4 A Not very long. He would just come by to, you
5 know, drop off articles or something like that.

6 Q Would he request to speak with you?

7 A If I was in the office I usually talked to him.

8 Q So you were his main contact with the
9 Bush-Quayle campaign?

10 A Yeah, probably.

11 Q Did you give him this letterhead at that point?
12 When he would come by did you give him letterhead?

13 A That, or I would like leave it for him with a
14 note on it, "for Barry Zorthian."

15 Q What was he supposed to do with it?

16 A He -- he was using it for -- for letters to his
17 Armenian committee just to say this is -- you know, "This
18 is what I'm doing," and I think he would also send them
19 like newspaper clips, things of that nature, but it was
20 more of what he was doing.

21 Q So you saw these letters that he sent out?

22 A Yes.

9304350092

1 Q Did you authorize him to send them out?

2 A No.

3 Q Did you review all of them?

4 A No.

5 Q How many?

6 A I probably did a couple of them.

7 Q Did you make suggestions to him, what he could
8 include in the letter?

9 A Not that I remember, no.

10 Q Did you give him information, the newsletters?

11 A He received the newsletter.

12 Q Did he receive anything else from you?

13 A He was part of the original 90, the original
14 Coalition, so he probably received the newsletter and the
15 60-day manual.

16 Q Was he at the National Press Club gathering?

17 A I believe so. I'm not positive.

18 Q When you sent people like this guy from the
19 Armenian campaign and Mr. Chirgotis 250 pieces of
20 letterhead, what were they supposed to do with it? What
21 types of things were they supposed to do?

22 A I don't know. I know that Mr. Zorthian, again,

9304350093

1 used it to contact his members and, you know, just let them
2 know of his activities.

3 Q Did they fundraise with these letters?

4 A They weren't supposed to. They had -- all of
5 them had received the do's and don'ts.

6 Q And one of the do's and don'ts was what? Was
7 not to fundraise?

8 A I think that was fairly clear probably. I'm not
9 positive, though.

10 Q Did you ever see a letter that fundraised on
11 letterhead you sent out?

12 A Sent out by like Barry?

13 Q Sent out by Barry on the letterhead that you
14 gave him.

15 A Not that I know of, no.

16 Q Did you tell this Armenian gentleman not to
17 fundraise?

18 A I don't know that it ever came up.

19 Q So you never told him that?

20 A Not that I -- no.

21 Q What was your title when you mailed FEC exhibit
22 one to Mr. Chirgotis?

9304350094

1 A Director, Coalition of American Nationalities.

2 Q Now, at the bottom of FEC exhibit one, is that
3 your business card?

4 A That's my business card, yes.

5 Q Let the record reflect the bottom left-hand
6 corner of FEC exhibit one is Mr. Chirgotis's letterhead --
7 Mr. Zogby. I'm sorry, Mr. Zogby.

8 MR. MAYBERRY: Business card.

9 THE WITNESS: Business card.

10 MR. MORGAN: Business card, right.

11 BY MR. MORGAN:

12 Q Why did you send this particular batch of 250
13 pieces of letterhead to Mr. Chirgotis?

14 A I'm not quite sure. Again, I had thought that I
15 had sent -- sent it all to Dr. Perros.

16 Q So do you recall if Mr. Chirgotis got in touch
17 with you to order the letterhead or did you get in touch
18 with him?

19 A He would have gotten in touch with me. I don't
20 -- I don't remember getting in touch with him on this.

21 Q So he called you?

22 A Yes.

9304350095

1 Q Did you get a lot of calls down at Bush-Quayle
2 headquarters for stuff like this?

3 A No.

4 Q How many a week?

5 A Again, there was only -- there was only a few
6 coalitions -- or committees that we actually did letterhead
7 for, the Armenians, the Greeks.

8 Q Any others?

9 A The Italians. I'm not sure. There was only a
10 few. There was probably only maybe one or two besides
11 those three that I mentioned.

12 Q The Italians, did you send them any of this
13 letterhead?

14 A Yes.

15 Q Who with the Italians did you send it to?

16 A It probably would have been Frank Stella.

17 Q How much did you send Mr. Stella?

18 A I can't remember the exact amount. It was
19 probably around this figure. I'm not sure.

20 Q Around what figure?

21 A 250.

22 Q When did you send this to him?

9304350096

1 A I don't know.

2 Q Would it be around the same time, October, 1988?

3 A Yes. I'm not positive, though.

4 Q Did Mr. Stella get in touch with you to get this
5 letterhead?

6 A Yes.

7 Q And did you meet him in person?

8 A No.

9 Q He called you on the telephone?

10 A Yes.

11 Q How often did you talk with Mr. Stella?

12 A Not very often.

13 Q Five times?

14 A A few times. Five times maybe.

15 Q As many as ten?

16 A Possibly.

17 Q What did he do with the letterhead?

18 A I don't know.

19 Q Did you ever see any Italian American mailings
20 on this letterhead?

21 A No.

22 Q So what was the total amount in letterhead you

9304350097

1 sent to Mr. Chirgotis and Mr. Perros in Greek Americans for
2 Bush?

3 A I don't know the total amount. I could guess
4 that it was -- if this is 250 here to Mr. Chirgotis and a
5 like number to Mr. Perros, Dr. Perros, that would be 500

6 Q How much does 500 pieces of letterhead cost?

7 A I don't know.

8 Q Was this letterhead printed in your office?

9 A It wasn't printed. We had a computer that could
10 do the names and then it was just Xeroxed on.

11 Q Did you operate this computer?

12 A Yes.

13 Q Did you prepare the letterhead?

14 A I did not -- I did not prepare the letterhead,
15 no.

16 Q But you operated --

17 A It was -- it was -- it was the computers that
18 the campaign had.

19 Q Where was this computer at?

20 A In Washington. In the headquarters.

21 Q So you had access to this computer.

22 A I did not work on the computer. I worked on the

9304350098

1 computer at my desk.

2 Q Who operated the computer? Somebody under you?

3 A I don't know. Volunteers.

4 Q How would you get the letterhead?

5 A Just ask for it

6 Q Who did you ask?

7 A Volunteer. On the computer.

8 Q What volunteer?

9 A I don't know. I can't remember the names

10 Q Do you remember any of the people that worked
11 with the computer?

12 A No.

13 Q So you would just go and put in a request.

14 Where did you go?

15 A To the person who was volunteering that day.

16 Q Were there a lot of different people that
17 volunteered?

18 A Yeah.

19 Q How did you mail it? How did you mail this FEC
20 exhibit one and the 250 pieces of letterhead?

21 A In an envelope, I suppose.

22 Q What type of mail?

93043500099

1 A First class, I guess. We just put them in a bin
2 to be sent out, and they were sent out.

3 Q Did you prepare the package to go out?

4 A Yes. That, or a volunteer.

5 Q Do you know how much the postage would be?

6 A No.

7 Q Did you ever send anything Federal Express?

8 A I may have sent other items, I may have sent
9 things Federal Express.

10 Q You know, we're talking October-November, right
11 the end of the campaign, things are starting to get hectic.
12 Could you authorize a package to go out immediately express
13 mail?

14 MR. MAYBERRY: I think he's already answered he
15 had no authority to have it sent out or how it was sent
16 out.

17 BY MR. MORGAN:

18 Q Mr. Zogby, you testified that maybe you could
19 send out things Federal Express. Is that correct?

20 A Yes.

21 Q Did you send out stationery and letterhead
22 Federal Express?

9304350100

1 A I don't know.

2 MR. MORGAN: I'm going to ask the reporter to
3 mark this as FEC exhibit two. It's one page. I'm going to
4 show FEC exhibit two to Mr. Zogby and his attorney, Mr.
5 Mayberry.

6 (The document referred to above was
7 marked as FEC Deposition Exhibit No.
8 2 for Identification.)

9 (There was a discussion between the
10 witness and counsel which was out of
11 the hearing of the court reporter.)

12 MR. MORGAN: Can we have the record reflect that
13 Mr. Zogby is consulting with counsel.

14 MR. MAYBERRY: Could the record reflect that Mr.
15 Morgan was consulting with co-counsel.

16 MR. MORGAN: No problem.

17 BY MR. MORGAN:

18 Q Mr. Zogby, can you identify FEC exhibit two for
19 us?

20 A It looks to be a letter from William Chirgotis.

21 Q Is this the letterhead you had produced and sent --

22 A Yes.

9304350101

1 Q -- Mr. Chirgotis? Did you have any input into
2 the text?

3 A No.

4 Q Is the text of this letter based on any other
5 information in the newsletters or the manual?

6 A I don't know.

7 Q In your newsletters did you have information
8 about Vice President Bush's position with the CIA,
9 information in the third paragraph of FEC exhibit two?

10 A It may have been mentioned in the newsletters.
11 I don't know.

12 Q In the newsletters did you talk about Vice
13 President Bush's experience?

14 A I'm not sure.

15 Q Is it fair to say that Mr. Chirgotis could have
16 gotten the information in the third paragraph of FEC
17 exhibit two from the newsletters or other information you
18 sent him?

19 A I don't know.

20 Q You testified that your newsletters had
21 information on Vice President Bush's record and reasons why
22 he should be president.

9304350102

1 A Correct.

2 Q Would you characterize the information in the
3 third paragraph of FEC exhibit two as that type of
4 information?

5 A I would characterize it as common knowledge.

6 Q It is the type of information, though, that you
7 would have supplied to the chairmen of the ethnic
8 coalition?

9 A I don't know.

10 Q Was this information familiar to you in August
11 of 1988?

12 A As I said, it's common knowledge.

13 Q Common knowledge to you?

14 A Yes.

15 Q I think it wouldn't necessarily be common
16 knowledge to everyone, but that's your opinion.

17 The figures at the bottom of FEC exhibit two, --

18 A Uh-huh.

19 Q -- were they a part of the letterhead and the
20 stationery that you produced?

21 A No.

22 Q Have you ever seen figures like that on the

9304350103

1 bottom on other letters?

2 A No.

3 Q Does the text of the letter sound familiar to
4 you at all?

5 A No. Outside of the common knowledge in
6 paragraph three, no

7 Q You say that's common knowledge to you based on
8 the fact that you were a member and a responsible worker
9 for the Bush-Quayle campaign in the ethnic coalition?

10 A No, based on the fact that I knew those things.
11 Common knowledge.

12 Q Where did you get that knowledge?

13 A Newspapers.

14 Q Did you get any of this stuff from things going
15 on at Bush-Quayle headquarters?

16 MR. MAYBERRY: I'm going to object to that. You
17 need some type of foundation if you want to start probing
18 into that. I think he's testified that it was common
19 knowledge, that he received the information in the
20 newspapers and --

21 MR. MORGAN: Could you --

22 MR. MAYBERRY: -- it seems to me that answers

9304350104

1 your question.

2 BY MR. MORGAN:

3 Q Could Mr. Chirgotis have come by this
4 information at the meeting at the National Press Club in
5 August of 1988?

6 MR. MAYBERRY Let me object. He can't speak
7 for what Mr Chirgotis knew or didn't know or when.

8 MR. MORGAN: I'm asking him to speak to what was
9 said at this August, 1988 National Press Club meeting.

10 BY MR. MORGAN:

11 Q He was there and you were there. Is that
12 correct?

13 A Uh-huh.

14 Q You heard things at this meeting. Right?

15 A It was a press announcement.

16 Q Did you hear this type of stuff in the press
17 announcement and in other information?

18 A No, not that I can remember.

19 Q I'm having trouble understanding how this
20 information, FEC exhibit two, section three, talks about
21 Vice President Bush's record --

22 A Uh-huh.

9304350105

1 Q -- his position on issues, and you've testified
2 that's the type of thing that you sent out to different
3 people.

4 A And again, it's common knowledge.

5 Q Was this common knowledge put in any of the
6 newsletters, any of your mailings?

7 MR. MAYBERRY: He's already said it did not.
8 This information did not go out in the newsletters. Is
9 that right?

10 (There was had a discussion between
11 the witness and counsel, which was
12 out of the hearing of the court
13 reporter.)

14 BY MR. MORGAN:

15 Q Okay. Did any of the newsletters make mention
16 of the fact that Vice President Bush had served as director
17 of the CIA?

18 A I don't remember.

19 Q Did the newsletters or any of the information
20 you sent out make mention of the fact of the achievements
21 of Bush and the Reagan-Bush ticket during the past eight
22 years, reducing taxes, unemployment rates, interest rates,

9304350106

1 inflation?

2 A I don't remember. Probably I would say yes.

3 Q Yes, this type of information was probably
4 included in the newsletters?

5 A It may have been, yes.

6 MR. MORGAN: Can we take a break?

7 MR. MAYBERRY: Sure.

8 (A recess was taken, after which the
9 following proceedings were had:)

10 MR. MAYBERRY: Keith, I think Mr. Zogby could
11 make a statement of clarification on this issue and
12 probably satisfy what you're after.

13 MR. MORGAN: On which issue?

14 MR. MAYBERRY: In terms of this paragraph,
15 unless you want to move on. It's your deposition.

16 MR. MORGAN: You identified the information in
17 the third paragraph as information that Mr. Chirgotis could
18 have received in any of the newsletters you sent out.

19 MR. MAYBERRY: Or newspapers.

20 THE WITNESS: Or newspapers. I don't know where
21 Mr. Chirgotis came by the information.

22 BY MR. MORGAN:

9304350107

1 Q I didn't ask you where he came by it. I asked
2 you could he have gotten the information --

3 MR. MAYBERRY: How is he to know where he could
4 have gotten it or not gotten it?

5 MR. MORGAN: He knows it was contained in the
6 newsletters, and if this information was contained in the
7 newsletters, it could have come from there

8 MR. MAYBERRY: Some of the information may or
9 may not have been contained. Where he got the information,
10 we don't know.

11 MR. MORGAN: I'm satisfied on the issue.

12 BY MR. MORGAN:

13 Q Mr. Zogby, in your December 21st, 1988 sworn
14 response to the complaint that was filed against you and
15 the committee you indicated that you traveled on behalf of
16 the Bush-Quayle campaign. You stated that "I received \$150
17 to cover travel expenses."

18 A Yes

19 Q Where did you go?

20 A It was Metro money Home and back.

21 Q \$150 in Metro money?

22 A Yes

9304350108

1 Q Who reimbursed you? What person?

2 A The Bush campaign.

3 Q Where did you get the check?

4 A The Bush campaign.

5 Q Did any individual hand you the check? Did they
6 mail you the check?

7 A I don't remember.

8 Q Do you remember who signed the check?

9 A No.

10 Q Did you do any other travel --

11 A No.

12 Q -- on behalf of the Bush-Quayle campaign?

13 A No.

14 Q Did the Bush-Quayle campaign volunteer to
15 reimburse you for your transit money? Or did you ask? Did
16 you ask to be reimbursed?

17 A No.

18 Q How did they know you needed it? Did they come
19 around and ask people?

20 A No.

21 Q How did that work? How did this whole
22 reimbursement work?

9304350109

1 A There was, I believe, a memo sent out.

2 Q By who?

3 A I don't -- I don't know who authored the memo.

4 Q What did the memo say?

5 A It had to do with travel reimbursement for
6 volunteers.

7 Q What were the guidelines?

8 A That you put in 35-plus hours a week, you were
9 considered a full-time volunteer.

10 Q So you were considered a full-time volunteer?

11 A Yes.

12 Q How many weeks did you put in more than 35
13 hours?

14 A I don't know. Every week.

15 Q You started in July.

16 A Uh-huh.

17 Q In July were you putting in more than 35 hours a
18 week?

19 A No.

20 Q How many hours a week then?

21 A I don't recall

22 Q Twenty hours?

9304350110

1 A I don't recall

2 Q By August were you putting in 35 hours a week
3 then?

4 A I don't remember.

5 Q Do you remember how much time you spent in the
6 office in August, 1988?

7 MR. MAYBERRY: He just answered he didn't know,
8 didn't remember.

9 THE WITNESS: I don't remember

10 BY MR. MORGAN:

11 Q Twenty hours a week in August, 1988?

12 A I don't remember.

13 Q Did you spend any time in the office in August,
14 1988?

15 A Yes.

16 Q In September, 1988, how many hours a week?

17 A Probably 35 plus.

18 Q So then you were starting to work 35, 40, more
19 than 40 hours?

20 A On occasion.

21 Q So what days of the week did you work? Monday
22 through Friday?

9304350111

1 A Yes.

2 Q Did you work weekends?

3 A No.

4 Q Did you work past six o'clock? Did you work
5 late?

6 A Possibly

7 Q When you worked late did you have like a key or --

8 A No.

9 Q -- something to get in? Did you have any form
10 of ID to get into Bush-Quayle headquarters?

11 A I had an ID.

12 Q Were you authorized to get in on weekends?

13 A I could get in the building with that.

14 Q Who issued the ID?

15 A The campaign.

16 Q In October how many hours were you working then?

17 A The same, 35 to 40.

18 Q As you were getting closer to the election were
19 you working more hours then?

20 A Thirty-five to forty.

21 Q Did you work any weekends in October?

22 A No.

9304350112

1 Q How many hours did you work in November?

2 A Again, 35 to 40.

3 Q Were you reimbursed any money for travel in
4 July?

5 A (Witness shakes head).

6 Q Is that a "no"?

7 A "No."

8 Q Were you reimbursed any money in August?

9 A I was reimbursed the \$150.

10 Q When?

11 A I don't know when I received that check.

12 Q Did you receive it, you say, before or after the
13 election?

14 A Before the election.

15 Q In October?

16 A I don't know. I don't remember.

17 Q So if you received it in, say, September, was it
18 an advance? Because you hadn't worked --

19 A I don't know when I received it.

20 Q Did you just receive one check?

21 A Yes.

22 Q Do you have any idea when you received it?

9304350113

1 A I don't remember.

2 Q Would you say it was in September?

3 A I don't know.

4 Q What information did you receive from the
5 Bush-Quayle campaign on federal election law and its limits
6 on your activities on behalf of the Bush-Quayle campaign?

7 A I don't remember.

8 Q You testified earlier this morning that you
9 received a memo, you sent out a memo of do's and don'ts.

10 A Right.

11 Q And that involved election law?

12 A Again, that was to the Coalition of American
13 Nationalities, the coalition, the 90 original members.

14 Q You were a not officer of this coalition of
15 nationalities. Correct?

16 A No.

17 Q You were a director?

18 A I was a director.

19 Q So did this information in this memo apply to
20 you?

21 A I don't know.

22 Q Were you instructed to distribute this

9304350114

1 information? You testified that you were instructed to
2 distribute this information. Is that correct?

3 A It was sent to the 90 original members of the
4 Coalition.

5 Q Did you read it?

6 A I typed it into the computer

7 Q So you had to have seen it and read it if you
8 typed it. Right?

9 A I typed it into the computer. I don't know how
10 closely I read it. I typed it into the computer.

11 MR. MORGAN: I'm now going to ask the reporter
12 to mark this FEC exhibit three. I'm handing a copy of FEC
13 exhibit three to Mr. Zogby and his attorney, Mr. Mayberry.

14 (The document mentioned above was
15 marked as FEC Deposition Exhibit No.
16 3 for Identification.)

17 MR. MORGAN: May the record reflect that Mr.
18 Zogby is reading FEC exhibit three.

19 BY MR. MORGAN:

20 Q Mr. Zogby --

21 MR. MAYBERRY: I'm sorry. Could I have another
22 couple minutes to read the document?

9304350115

1 MR. MORGAN: May the record reflect that Mr.
2 Mayberry asked for a couple extra minutes to finish reading
3 FEC exhibit three.

4 MR. MAYBERRY: Thank you.

5 BY MR. MORGAN:

6 Q Mr. Zogby, could you identify FEC exhibit three.

7 A It's a memorandum from Ceci Cole McInturff
8 director for national voter coalitions, to all national and
9 state coalition leaders.

10 Q Have you ever seen a copy of FEC exhibit three
11 before?

12 A I believe this is the do's and don'ts memo. I'm
13 not positive.

14 Q Is this the memo you typed?

15 A I believe I typed this. I don't know -- I can't
16 state positively.

17 Q Did you receive similar information in memos
18 similar to FEC exhibit three?

19 A I don't remember.

20 Q Do you recall when you typed the memo that might
21 be this one?

22 A Again, I typed a do's and don'ts memo.

9304350116

1 Q Which this is similar to if not the same memo?

2 A Yeah.

3 Q When did you type it?

4 A Well, if this is it, I guess it would have to be
5 October, 1988

6 Q Did you see this memo, type this memo or similar
7 memo before or after you mailed the letterhead to Mr
8 Chirgotis?

9 A I don't know.

10 Q Was it around the same time?

11 A It's dated 10-12, so I guess it's around the
12 same time.

13 Q So you typed the memo around the same time that
14 you sent the information to Mr. Chirgotis, the letter and
15 the letterhead to Mr. Chirgotis?

16 A If this is the same memo.

17 Q Is that yes?

18 A If this is the same memo, it would be around the
19 same time.

20 Q Did you distribute FEC exhibit three to the
21 coalition members, to the Armenians, the Italians, the
22 gentleman you mentioned earlier?

9304350117

1 A To the original -- it was sent out to the
2 original 90.

3 Q Did you send out any similar information?

4 A I don't remember

5 Q Do you recall, is this the only type of memo you
6 saw containing do's and don'ts?

7 A There was one do's and don'ts memo.

8 Q There was only one do's and don'ts memo?

9 A That I can recall.

10 Q Did you ever tell the Coalition chairmen to
11 fundraise?

12 A No.

13 Q Well, did you ever tell them that there wasn't
14 enough funds for anything, for ads or for letters?

15 A Yes.

16 Q When?

17 A When they inquired about money.

18 Q When did this happen?

19 A I don't remember exactly.

20 Q Was it in October?

21 A I don't remember.

22 Q It was either in September or October, 1988. Is

9304350118

1 that correct?

2 A Probably, yes.

3 Q What did you tell them?

4 A I told them we didn't have any money.

5 Q Who did you tell?

6 A Barry Zorthian, for one

7 Q And what organization is he with, again?

8 A Barry was a member of the Coalition, the
9 original 90, the Armenian.

10 Q Who else?

11 A Ted Perros.

12 Q What organization was he with, again?

13 A He was, again, a Coalition member, original 90.

14 Q Which nationality?

15 A Dr. Perros is Greek.

16 Q Mr. Stella, the Italian coalition?

17 A I don't remember.

18 Q Mr. Chirgotis?

19 A I don't remember.

20 Q What did you tell them to do? Did you tell them

21 "We don't have any money"? Did you tell them to do

22 anything?

9304350119

1 A No.

2 Q When they called with their ideas to advocate
3 Bush's election and didn't have any money, do you have any
4 idea what they did after you told them you didn't have any
5 money?

6 A No.

7 Q Would it surprise you to learn some of these
8 individuals thought they were supposed to go fundraise to
9 get the money to do these things?

10 A Yes.

11 Q Why?

12 A It just would surprise me. This memo states
13 that they -- they are not to fundraise

14 Q Wait a minute. Think about a person who is
15 being told, charged up to go out and support George Bush.
16 You're telling them to do that. You're sending them
17 information to advocate George Bush, and then they come to
18 you and they're asking for money, and you tell them "We
19 don't have any money."

20 A Uh-huh.

21 Q What was their next step?

22 A I don't know.

9304350120

1 MR. MAYBERRY: I'm going to object. I'm not
2 sure what the question is, either.

3 BY MR. MORGAN:

4 Q My question is: For instance, Mr. Stella, an
5 Italian American organization, you talked to him on the
6 phone. Right?

7 A Uh-huh.

8 Q You talked to him about the Bush-Quayle
9 campaign. What types of things did you expect him to do?

10 A (No response).

11 Q You're shrugging. I need an answer.

12 MR. MAYBERRY: I think the problem is some of
13 these things you need to put a foundation in so we could
14 answer these questions in the specific rather than the
15 general. I have an objection before so you can go with the
16 flow of your questioning, but at this point if you want a
17 proper foundation in terms of conversations or any other
18 activities.

19 BY MR. MORGAN:

20 Q Mr. Zogby, you testified, for instance, that you
21 had conversations with Mr. Chirgotis. Is that correct?

22 A Yes.

9304350121

1 Q Did Mr. Chirgotis ever call with ideas as to how
2 he could --

3 A I don't remember.

4 Q You testified that Mr. Perros called --

5 A Yes

6 Q -- and asked about money.

7 A Yes

8 Q What did you tell him?

9 A I told him we didn't have any

10 Q Why did he want the money?

11 A He wanted to -- he wanted to place ads in Greek
12 newspapers.

13 Q Did you help him? Did you give him any
14 information? Did you give him names of newspapers?

15 A No.

16 Q Did you tell him not to place the adds?

17 A I told him we didn't have any money for them.

18 Q Did you tell him therefore he couldn't place the
19 ads?

20 A I told him the campaign could not pay for any
21 ads.

22 Q But you never told him not to place the ads?

9304350122

1 (There was had a discussion between
2 the witness and counsel, which was
3 out of the hearing of the court
4 reporter.)

5 MR. MORGAN Let the record reflect that Mr
6 Zogby is consulting with counsel.

7 MR. MAYBERRY: And that you've also consulted
8 with your co-counsel in the same break.

9 MR. MORGAN: But only after Mr Mayberry
10 consulted Mr. Zogby.

11 MR. MAYBERRY: Okay. We'll wait next time until
12 you do it first before we consult. Okay?

13 BY MR. MORGAN:

14 Q So what did you tell him to do?

15 A I told him that the campaign could not pay for
16 any ads.

17 Q Did you tell him not to send out the ads, to
18 place the ads?

19 A I told him he could not place any ads with any
20 authorization from the campaign. The campaign could not
21 pay for any ads.

22 Q Could they authorize the ads?

9304350123

1 A No. If Mr. Perros wanted to go ahead on his
2 own, but we could not pay for any ads.

3 Q So you told him he could place the ads on his
4 own if he wanted to?

5 A I said that if he wanted to place ads to go
6 ahead and do it, but he could not use Bush-Quayle titles,
7 could not use Bush-Quayle logo, Bush-Quayle '88 symbol, and
8 that the campaign -- he could not do it with the
9 authorization of the campaign.

10 Q But could he still do it under his title,
11 chairman of the Coalition of Greek Americans for Bush or as
12 a member of the Coalition?

13 A No. The campaign could not pay for any ads.

14 Q Look at FEC exhibit two. Would it surprise you
15 after that conversation that he would use the stationery
16 you sent, the letterhead you sent to raise money to pay for
17 these ads?

18 A Yes.

19 Q When you sent the letterhead was it before or
20 after Mr. Perros asked you to pay for the ads?

21 A I don't remember

22 Q Was it close to, around the time?

9304350124

1 A I don't remember

2 Q Did you tell him expressly not to use the
3 letterhead?

4 A I told him that the campaign could not pay for
5 any ads, that he could not use the Bush-Quayle symbol or
6 any title.

7 Q What funds was he supposed to use for the ad?

8 A I don't know.

9 Q How was he supposed to get the funds for the ad?

10 A I don't know.

11 Q With reference to the bottom of FEC exhibit
12 three, the second page, the last paragraph, did you ever
13 consult with Mr. Baran, the general counsel of Bush-Quayle?

14 A I've spoken with Jan Baran.

15 Q Did you speak with him about federal election
16 law?

17 MR. MAYBERRY: I'm going to object. It's
18 privileged conversation. We'll assert it on behalf of Mr.
19 Zogby, attorney-client privilege.

20 BY MR. MORGAN:

21 Q Was Mr. Baran your attorney?

22 A He was general counsel for Bush-Quayle.

9304350125

1 Q Has Mr. Baran ever represented you in your
2 individual capacity?

3 A No.

4 Q When you spoke with Mr. Baran was anyone else
5 present?

6 A No.

7 Q How many times did you speak with Mr. Baran?

8 MR. MAYBERRY: Again I'll object at this time,
9 right in the early form of your questioning. This is
10 privileged information in terms of conversations with Mr.
11 Baran, who is --

12 BY MR. MORGAN:

13 Q Is Mr. Baran currently your attorney?

14 A No.

15 Q Have you ever in your individual capacity used
16 Mr. Baran as your attorney?

17 MR. MAYBERRY: He's already answered that.

18 Again I'm going to instruct my client not to answer these
19 series of questions because this is privileged information
20 protected by attorney-client privilege that Mr. Baran and
21 Mr. Zogby had during the campaign.

22 MR. MORGAN: Mr. Zogby has testified that Mr.

930435126

1 Baran was never his attorney in his individual capacity. I
2 believe that the attorney-client privilege does not apply
3 to that information.

4 MR. MAYBERRY: That's wrong. He's an attorney
5 in his capacity as a full-time volunteer.

6 MR. MORGAN: I asked him his capacity.

7 BY MR. MORGAN:

8 Q So Mr. Zogby, I ask you, how many times did you
9 talk with Mr. Baran?

10 A Once, twice, I don't remember.

11 Q When did you speak with him?

12 MR. MAYBERRY: Again, I'm going to instruct my
13 client not to answer these questions based on attorney-
14 client privilege. Mr. Baran represented the campaign, and
15 Mr. Zogby was part of the campaign in connection with his
16 volunteer activities, and consistent with FEC exhibit
17 number three that should there be legal questions to call
18 Mr. Baran, that Mr. Zogby followed those directions when he
19 felt he needed to talk with him.

20 MR. MORGAN: We haven't established that yet.

21 BY MR. MORGAN:

22 Q When did you speak with Mr. Baran?

9304350127

1 A (No response).

2 Q Mr. Zogby, when did you speak to Mr. Baran?

3 MR. MAYBERRY: Mr. Morgan, I guess you'll have
4 to direct that to me. I've instructed my client not to
5 answer attorney-client information about his relationship
6 with Mr. Baran. If you have any questions on that, I'd be
7 glad to answer them for you --

8 MR. MORGAN: Your client has responded to the
9 question.

10 MR. MAYBERRY: No, and he's not going to,
11 either.

12 BY MR. MORGAN:

13 Q I'll ask you again. When you consulted with Mr.
14 Baran were you a volunteer for the Bush-Quayle '88
15 campaign?

16 (There was had a discussion between
17 the witness and counsel, which was
18 out of the hearing of the court
19 reporter.)

20 THE WITNESS: I'm not answering the question on
21 the advice of counsel.

22 MR. MORGAN: I'm going to ask the reporter to

9304350128

1 mark this as FEC exhibit four. I'm handing a copy of FEC
2 exhibit four to Mr. Zogby and his attorney, Mr. Mayberry.

3 MR. MAYBERRY: Thank you.

4 (The document referred to above was
5 marked as FEC Deposition Exhibit No.
6 4 for Identification.)

7 MR. MAYBERRY: Mr. Morgan, just for our
8 information, how long do you estimate that the deposition
9 will last? Is it going to last past lunch? Just for
10 planning purposes.

11 MR. MORGAN: Could we go off the record.

12 (There was had a discussion off the
13 record, which was not reported by
14 the court reporter.)

15 MR. MORGAN: Back on the record.

16 BY MR. MORGAN:

17 Q Mr. Zogby, could you identify FEC exhibit four.

18 A It's a mailing by the Arab American Republican
19 Federation.

20 Q I would like to reference you to page two of
21 exhibit four. Is that your signature at the --

22 A Yes, it is.

9304350129

1 Q How many people would you say received this
2 mailing?

3 A I believe we answered that in the affidavit.

4 Q Do you recall what you said in the affidavit?

5 A 888.

6 Q When was FEC exhibit four distributed?

7 A I guess it was mailed October 19th, 1988.

8 Q Were you working in the Coalition of American
9 Nationalities' office of the Bush-Quayle campaign when this
10 was mailed out?

11 A Yes.

12 Q Whose idea was it to send out this mailing?

13 A Mike Sarafa.

14 Q Anyone else?

15 A Not to my knowledge.

16 Q Was anyone in the Bush-Quayle campaign aware of
17 this mailing?

18 A Not to my knowledge.

19 Q Did you tell anyone in the Bush-Quayle campaign?

20 A No.

21 Q But you were aware of this mailing going out.

22 Is that correct?

9304350130

1 A I signed it.

2 Q Did you write the cover letter?

3 A No, I did not.

4 Q You signed the letter. Did you read it before
5 you signed it?

6 A Yes, I did.

7 Q Who participated in the preparation of this
8 mailing?

9 A Mike Sarafa.

10 Q Who else?

11 A Mike Sarafa.

12 Q Did you?

13 A No.

14 Q Other than the signing.

15 A I signed it.

16 Q And to read it.

17 A That's correct.

18 Q Did you read the other enclosures?

19 A Yes, I did.

20 Q Did you make any changes after you read it?

21 A No.

22 Q Did you add any other enclosures?

9304350131

1 A No.

2 Q How much would you say this mailing cost to
3 distribute?

4 MR. MAYBERRY: If you know.

5 THE WITNESS: That was answered. I don't
6 remember the figure. It was answered.

7 BY MR. MORGAN:

8 Q Where was it answered? In the interrogatories?

9 A In the interrogatories.

10 Q Why did you sign the cover letter?

11 A They asked me to sign.

12 Q Who asked you?

13 A Mike asked me to sign.

14 Q Why?

15 A Because people knew me.

16 Q What people?

17 A The people that the mailing was sent to.

18 Q What did they know about you?

19 A They knew me. They didn't know Mike.

20 Q How did they know you?

21 A I was an officer in the Federation.

22 Q Did they know you as a member of the Bush-Quayle

9304350132

1 campaign?

2 A No.

3 Q Did anybody that received the mailing know that
4 you were volunteering in the Bush-Quayle campaign?

5 A I don't know.

6 Q Did Mike Sarafa know that you were working in
7 the Bush-Quayle campaign?

8 MR. MAYBERRY: Object. How would he know
9 whether Mr. Sarafa knew or didn't know?

10 BY MR. MORGAN:

11 Q Did you tell him?

12 A I don't remember.

13 Q In October, 1988, when you sent this mailing you
14 testified that you were working at Bush-Quayle headquarters
15 35 hours a week. Is that correct?

16 A I didn't send this mailing.

17 Q When you signed it.

18 A Yes.

19 Q You were working at Bush-Quayle headquarters.
20 That was your testimony. Is that correct?

21 A Yes.

22 Q You were also working at the Arab American

9304350133

1 Institute. Is that correct?

2 A I would go by to pick up phone messages.

3 Q Where did you sign this letter?

4 A I don't remember.

5 Q Do you remember who was present when you signed
6 it?

7 A I believe Mike was.

8 Q Did you ever tell him when you signed the letter
9 or any time in October, 1988, that you worked for the
10 Bush-Quayle campaign?

11 A I don't remember.

12 Q Did he ask you what you were doing?

13 A I don't remember.

14 Q Did you get any information from the Bush-Quayle
15 campaign that's in this mailing?

16 (There was had a discussion between
17 the witness and counsel, which was
18 out of the hearing of the court
19 reporter.)

20 THE WITNESS: I answered in the interrogatories
21 where each of these pieces contained in the mailing came
22 from.

9304350134

1 BY MR. MORGAN:

2 Q But for the record did any of this information
3 come from the Bush-Quayle campaign?

4 A I answered in the -- in the interrogatories
5 where each of these pieces came from.

6 Q Looking at the mailing right now do you recall
7 if any of this information came from the Bush-Quayle
8 campaign?

9 A I answered in the interrogatories where each of
10 these pieces came from.

11 Q What did you say in the interrogatory?

12 A That Mike Sarafa prepared this mailing and that
13 I signed it.

14 Q And you reviewed it. Is that correct? You
15 testified to that. Right?

16 A I read it, yes.

17 Q I'm looking at FEC exhibit four, page three. Do
18 you recall reading that when you signed the cover letter?

19 A Yes

20 Q Was this information available at Bush-Quayle
21 headquarters?

22 A This information was available in the public

9304350135

1 domain.

2 Q When you say "public domain," what do you mean?

3 A The newspapers, and I believe we also -- I also
4 answered where this piece came from in the interrogatories.

5 Q Do you recall what it said in the interrogatory?

6 A Public information, newspaper clippings

7 Q In the interrogatories you state that this
8 enclosure entitled Vice President George Bush on Issues of
9 Concern to Arab Americans or the information on this came
10 from Bush issue statements. Where did you obtain or Mr.
11 Sarafa obtain these issue statements?

12 A I don't know where he obtained them.

13 Q Were these issue statements available at
14 Bush-Quayle headquarters?

15 A I don't know where he obtained them.

16 Q Would you say issue statements were available at
17 Bush-Quayle headquarters?

18 (There was had a discussion between
19 the witness and counsel, which was
20 out of the hearing of the court
21 reporter.)

22 THE WITNESS Yes.

9304350136

1 BY MR. MORGAN:

2 Q Was any of the information in the text of this
3 letter -- and you can read it -- somewhere near the
4 information you included in newsletters or any other
5 letters you prepared for the Bush-Quayle campaign? That
6 applies to both the cover letter and this particular
7 enclosure

8 A I don't know.

9 Q Does any of it look similar to the information
10 that was contained in the newsletters?

11 A Again, I don't know.

12 Q For instance, on page two of the enclosure --

13 A Page four?

14 Q Page four of exhibit four at the top, George
15 Bush on Racism and Bigotry. Do you recall seeing this
16 information at Bush-Quayle headquarters?

17 A No.

18 Q Now, I believe this was from George Bush's
19 acceptance speech at the Republican convention. He coined
20 the phrase "a kinder and gentler nation," "I want a kinder
21 and gentler nation," August 18th, 1988. Do you recall
22 including this statement in your newsletter or any other

9304350137

1 information you sent out?

2 A I don't remember.

3 Q Did you ever use the statement "I want a kinder
4 and gentler nation"?

5 A I don't remember

6 Q Had you ever heard that statement before?

7 A Yes.

8 Q The cover letter, the cover letter that you
9 signed, --

10 A Yes.

11 Q -- was any information in the cover letter
12 similar to the information you sent out in your newsletter
13 or any of your other correspondence from the Bush-Quayle
14 campaign?

15 A I don't know.

16 Q Take your time to read it.

17 (There was had a discussion between
18 the witness and counsel, which was
19 out of the hearing of the court
20 reporter.)

21 THE WITNESS: I don't know.

22 BY MR. MORGAN:

9304350138

1 Q Did the Bush-Quayle campaign reimburse the Arab
2 American Republican Foundation for any of the cost of this
3 mailing?

4 A I don't know.

5 Q Did the Bush-Quayle campaign reimburse you for
6 any of the costs of this mailing?

7 A Only the \$150 travel expense. That was the only
8 thing I received from the Bush campaign.

9 Q For FEC exhibit four, the cost of preparation of
10 exhibit four --

11 A I received nothing, no.

12 Q To your knowledge did Mr. Sarafa receive
13 anything from the Bush-Quayle campaign for that?

14 A To my knowledge, no.

15 Q Did Mike Sarafa work for the Bush-Quayle
16 campaign?

17 A No.

18 Q Did any of the officers of the American
19 Republican Foundation --

20 A Federation.

21 Q -- Federation work for the Bush-Quayle campaign?

22 A No --.

9304350139

1 Q You list the officers in your response to your
2 interrogatories.

3 A That's correct.

4 Q You can help me with the pronunciation.

5 A Sure. It's Nader Sayegh.

6 Q Did Nader Sayegh work for the Bush-Quayle
7 campaign?

8 A No.

9 Nazar Jwaideh.

10 Q Did Nazar Jwaideh --

11 A No. It's indicated. He was deceased. It was
12 before the campaign.

13 Q Was it in 1988?

14 A No. He passed away before then.

15 Q The corresponding secretary?

16 A Ray Baroud, no.

17 Q Was Ray Baroud affiliated with the Bush-Quayle
18 '88 campaign?

19 A Not to my knowledge.

20 Mounzer Chaarani.

21 Q Was Mounzer Chaarani affiliated in any way with
22 the Bush-Quayle '88 campaign?

9304350140

1 A Mounzer was a member of the Arab Americans for
2 Bush-Quayle '88.

3 Q What was his title? Arab Americans for
4 Bush-Quayle?

5 A Let's see. He was a vice chair.

6 Q So Mounzer Chaarani was vice chair of what
7 organization?

8 A Arab Americans for Bush-Quayle '88 Committee.

9 Q What did he do for Arab Americans for
10 Bush-Quayle '88 Committee?

11 A I don't know.

12 Q Did you ever discuss with him Bush-Quayle
13 business or Bush-Quayle activities?

14 A No.

15 Q What type of organization was the Arab Americans
16 for Bush-Quayle '88?

17 A I'm not sure I understand the question.

18 Q Was Arab Americans for Bush-Quayle '88 a member
19 of the ethnic coalition?

20 A It was part of the Coalition of American
21 Nationalities.

22 Q Did Arab Americans for Bush-Quayle '88 share

9304350141

1 office space with the Arab American Republican Federation?

2 A No.

3 Q Did it share any personnel?

4 A I'm sorry?

5 Q Did it share any of the same personnel?

6 A No.

7 Q Well, Mr. Chaarani --

8 A Mr. Chaarani I believe was a volunteer at the
9 campaign.

10 Q Was he paid?

11 A Not to my knowledge, no.

12 Q Did you ever send Mr. Chaarani any letterhead?

13 A No.

14 Q Did you ever send Mr. Chaarani your letterhead?

15 A I don't remember.

16 Q Did you send Mr. Chaarani any information on the
17 Bush-Quayle '88 campaign?

18 A I don't know.

19 Q Well, with the Arab American Supporters for
20 Bush, that particular ethnic coalition, did you receive
21 calls from Mr. Chaarani asking for advice? Did he place
22 calls to you?

9304350142

1 A No.

2 Q Did you receive any calls from him?

3 A No.

4 Q Did you make any calls to him?

5 A No.

6 Q Did he receive FEC exhibit three, the memo that
7 you typed?

8 A This one (indicating)?

9 Q Yes.

10 A I don't know.

11 Q Is it possible that he received it?

12 A I don't know.

13 Q So was the Arab American Supporters for
14 Bush-Quayle, when was it formed?

15 A October 20th, 1988. Bush -- Arab Americans for
16 Bush-Quayle '88. You're referring to the title here?

17 Q That's right, the title on page six --

18 A Arab Americans for Bush-Quayle '88 Committee.

19 Q Page six of FEC exhibit four.

20 A Right. October 20th, 1988.

21 Q Okay. Let's go back through the mailing. At
22 the bottom of page four of FEC exhibit four the group

9304350143

1 identifies Arab American Supporters for George Bush. When
2 was that organization formed?

3 A I don't know.

4 Q Did you ever work with Arab American Supporters
5 for George Bush?

6 A Not to my knowledge.

7 Q Is Arab American Supporters for George Bush
8 affiliated with the Bush-Quayle campaign?

9 A Not to my knowledge.

10 Q Was it affiliated with Arab Americans for
11 Bush-Quayle '88?

12 A Not to my knowledge.

13 Q Was Mr. Sarafa a member of Arab American
14 Supporters for George Bush?

15 A I don't know.

16 Q Was Mr. Chaarani?

17 A Chaarani.

18 Q Chaarani, I'm sorry. Was Mr. Chaarani a member
19 of Arab American Supporters for George Bush?

20 A I don't know.

21 Q I see that Arab American Supporters for George
22 Bush shares the same address with the Arab American

9304350144

1 Republican Federation. Is that correct?

2 A Yes.

3 Q So was Arab American Supporters for George Bush
4 a part of the Arab American Republican Federation?

5 A I don't know

6 Q What was its relationship?

7 A I don't know.

8 Q But they did share the same office?

9 A They have the same address.

10 Q Okay. Looking at the next page of FEC exhibit
11 four, page five, have you seen --

12 A Yes.

13 Q -- this enclosure before?

14 A Yes.

15 Q Where at and when?

16 A When I signed -- when I signed the letter, the
17 cover letter.

18 Q Do you know where it came from?

19 A It's from Congressman Paul Findley.

20 Q How did Mr. Sarafa obtain it?

21 A I don't know.

22 Q Do you recall seeing this letter any time after

9304350145

1 the mailing?

2 A I saw it when I signed the mailing.

3 Q Any other time?

4 A It's -- I don't remember.

5 Q Did you ever see a copy of this letter at
6 Bush-Quayle '88 headquarters?

7 A No

8 Q Okay. Going back to page six of FEC exhibit
9 four, did you ever see this before?

10 A Yes.

11 Q When was the first time you saw it?

12 A I don't remember.

13 Q Did you see it when you signed the cover letter?

14 A Yes.

15 Q Did you ever see it at Bush-Quayle headquarters?

16 A I may have.

17 Q Is FEC exhibit four, page six, printed on the
18 same type of letterhead that you sent out to Coalition
19 chairmen?

20 A It's -- it's on Bush-Quayle '88 letterhead.

21 Q Can you identify Leslie Goodman?

22 A Yes. She is -- she was -- I don't know her

9304350146

1 exact title, but she was the press person for the voter
2 coalitions.

3 Q Did you work with Miss Goodman?

4 A On occasion.

5 Q On what occasions?

6 A I may have spoken to her during the campaign.

7 Q How many times?

8 A I don't know.

9 Q Did you attend meetings?

10 A No.

11 Q Did you help her prepare press releases?

12 A No.

13 Q What types of things did you work with her on?

14 A If -- if a committee was going to be announced,

15 I would give the press people the names and that sort of

16 thing.

17 Q Okay. Well, we can look at this, at FEC exhibit

18 four, page six.

19 A Uh-huh.

20 Q Would you give her this type of information, the

21 type of information contained in this press release?

22 A Yes.

9304350147

1 Q Did you give her the information contained in
2 this particular press release?

3 A I don't remember.

4 Q So it's possible?

5 A It is possible.

6 Q What other press releases did you give her
7 information on?

8 A We announced a Polish committee, an Italian
9 committee, and I believe an Armenian committee and a Greek
10 committee. And there may have been others.

11 Q So you saw this press release before this
12 mailing was put together.

13 A I did not see this press release. I again gave
14 them the names of the Arab American committee.

15 Q So you weren't surprised when you saw the press
16 release and the mailing?

17 A No.

18 Q Let's go to page seven of FEC exhibit four. Can
19 you identify it?

20 A Yes. It's an Arab American Republican
21 Federation membership card.

22 Q Have you seen it before?

9304350148

1 A Yes.

2 Q When?

3 A Back in December -- first back in December, '87,
4 I believe.

5 Q Did you prepare it?

6 A Yes, I did

7 Q Did you prepare it in December of '87?

8 A Yes.

9 Q How many of these did you send out?

10 A It's answered in the interrogatories.

11 Q So did you approve of Mr. Sarafa's use of this
12 for the mailing?

13 A I signed the letter and saw that it was
14 enclosed.

15 MR. MORGAN: Okay. We can take a break now.

16 (A recess was taken, after which the
17 following proceedings were had:)

18 BY MR. MORGAN:

19 Q I'm going to ask you some questions about the
20 newsletters and the availability of them now. Do you have
21 the newsletters that you sent out to the Coalition
22 chairmen, the members of the Coalition?

9304350149

1 A Do I have them?

2 Q Do you have copies of them?

3 A No.

4 Q Do you know who would have copies?

5 A No.

6 Q Would anyone in the Bush-Quayle campaign still
7 have copies of the newsletters?

8 A I don't know.

9 Q Would anyone, any of the Coalition members? Do
10 you think they would still have them?

11 A I don't know.

12 Q Do you have a copy of the list of names you sent --

13 A No.

14 Q -- them to? Would the Bush-Quayle campaign
15 still have a copy of the names?

16 A I don't know.

17 Q Do you have any idea how we could obtain the
18 newsletter?

19 A No, I don't.

20 Q How about the mailing list?

21 A (Witness shakes head).

22 Q Is that a "no"?

9304350150

1 A No. I don't know.

2 Q What was the name of the newsletter, the title?

3 A I don't know that it had a title.

4 Q When you prepared it --

5 A Uh-huh

6 Q -- what did you put at the top?

7 A It was just on Bush-Quayle letterhead.

8 Q Can the record reflect that the witness referred

9 to page six of FEC exhibit four

10 So at the top what did it say?

11 A "Bush-Quayle '88," the letterhead part there
12 (indicating).

13 Q What did it say below the letterhead?

14 A It would just be the -- whatever the newsletter
15 was on.

16 Q So the newsletters dealt with different topics
17 every week?

18 A Yes.

19 Q What were some of the topics?

20 A Bush on defense, Bush on family values, Bush --
21 Reagan-Bush economic record. You know, general topics.

22 Q So was it similar in format to page three and

9304350151

1 four of FEC exhibit four?

2 A No. It had -- I mean it was written in
3 paragraphs, paragraph form.

4 Q But it mentioned specific issues? Did it deal
5 with one single issue every week or did it deal with
6 several issues?

7 A It depended. Sometimes it was one issue.

8 Q If I want to get these documents, get copies of
9 these documents, how could I identify them in order to
10 obtain copies?

11 A I don't know.

12 Q What was the title of the mailing list?

13 A I don't know that it had a title.

14 Q It was just a list of names?

15 A Coalition of American Nationalities.

16 Q Members? Chairmen?

17 A The original 90, and again, as I stated earlier,
18 we compiled the list.

19 Q So it contained 90 names approximately?

20 A No, no. The mailing list for the newsletter?

21 Q Yes.

22 A I believe I answered that earlier and I said

9304350152

1 that we started with a couple hundred names and then added
2 names to it as they came in.

3 Q Okay. That list. What was the name of that
4 list?

5 A The Coalition of American Nationalities. I
6 don't know that it had a specific title.

7 Q Okay. What was the relationship of the Arab
8 American Republican Federation to the Bush-Quayle campaign?

9 A No relationship.

10 Q Did members of the Arab American Republican
11 Federation, other than just its officers, participate in
12 the Bush-Quayle campaign?

13 MR. MAYBERRY: If you know.

14 THE WITNESS: I don't know.

15 BY MR. MORGAN:

16 Q What was the relationship of the Arab American
17 Republican Federation with Arab Americans for George Bush?

18 A I don't know.

19 Q Have you heard of Arab Americans for George
20 Bush?

21 A No.

22 Q What was the relationship of the Arab American

9304350153

1 Republican Federation with Arab American Supporters of
2 George Bush?

3 A I don't know.

4 Q When we looked at FEC exhibit four, page four --

5 (There was had a discussion between
6 the witness and counsel, which was
7 out of the hearing of the court
8 reporter.)

9 THE WITNESS: I'm sorry.

10 BY MR. MORGAN:

11 Q The relationship of the Arab American Republican
12 Federation to Arab American Supporters of George Bush?

13 A I don't know.

14 Q Have you ever heard of Arab American Supporters
15 of George Bush?

16 A It was in the mailing that I signed.

17 Q Had you ever seen it before?

18 A (Witness shakes head)

19 Q Were you aware that --

20 MR. MORGAN: Off the record.

21 (There was had a discussion off the
22 record, which was not reported by

9304350154

the court reporter.)

MR. MORGAN: Speak out loud.

THE WITNESS: I'm sorry.

BY MR. MORGAN:

Q The relationship of the Arab American Supporters for George Bush and the Arab American Republican Federation, were you aware that they shared the same address?

A Yes.

Q How were you aware of that?

A I saw the -- when I read through the mailing I saw the address when I signed the mailing.

Q Did the Arab American Supporters for George Bush have an office in the Arab American Republican Federation?

A I don't know.

Q What was the relationship of the Arab American Republican Federation to the Arab American Institute?

A I believe we answered that in the interrogatories.

Q No, we didn't.

(There was had a discussion between the witness and counsel, which was

9304350155

1 out of the hearing of the court
2 reporter.)

3 MR. MAYBERRY: Could we have the question
4 repeated?

5 BY MR. MORGAN:

6 Q The relationship of the Arab American Republican
7 Federation to the Arab American Institute.

8 MR. MAYBERRY: Well, I guess what -- it might be
9 helpful if you could be more specific rather than asking a
10 general question.

11 BY MR. MORGAN:

12 Q Did the Arab American Republican Federation
13 share offices with the Arab American Institute?

14 A Yes.

15 Q Did they share personnel?

16 A (No response)

17 Q Maybe this will help: You testified that you
18 were an employee of the Arab American Institute --

19 A Right.

20 Q -- for a couple years, four years. Right?

21 A That's correct.

22 Q Could you describe the Arab American Institute.

9304350156

1 What was its purpose, what types of things did it do?

2 A It was to bring Arab Americans into the
3 political process.

4 Q How did it go about doing that?

5 A I believe I answered that. Voter registration,
6 things of that nature.

7 Q What was the purpose of the Arab American
8 Republican Federation?

9 A The Arab American Republican Federation was --
10 it was -- it's a member of the National Republican Heritage
11 Groups Council.

12 Q What types of things did the Arab American
13 Republican Federation do?

14 A Principally it was made up of Arab American
15 Republican clubs, federation of clubs.

16 Q Did it work in conjunction with the Arab
17 American Institute in its activities to get out the vote
18 and to empower Arab Americans politically?

19 A It had similar goals.

20 Q Did it have the same leadership?

21 A No.

22 Q Well, you're national secretary of the Arab

9304350157

1 American Republican Federation.

2 A Right.

3 Q And you also were an employee of the Arab
4 American Institute.

5 A That's correct

6 Q Did you work for both organizations
7 simultaneously?

8 A I was -- I was the Republican liaison for the
9 AAI. I was also a member and an officer of the Republican
10 Federation, Arab American Republican Federation.

11 Q Did you have two offices? Did you have one
12 office as national secretary of the Arab --

13 A No.

14 Q So how did you separate the work? When you were
15 working on something for the Arab American Institute, is it
16 the same thing as working for the Arab American Republican
17 Federation?

18 (There was had a discussion between
19 the witness and counsel, which was
20 out of the hearing of the court
21 reporter.)

22 THE WITNESS: Yeah, they -- I kept track of the

9304350158

1 time that I worked for AAI and the work that I did -- I
2 logged the time I guess that I worked for AARF, Arab
3 American Republican Federation.

4 BY MR. MORGAN:

5 Q You started at the Arab American Institute in
6 1985?

7 A April, 1985.

8 Q April, 1985. When did you start at the Arab
9 American Republican Federation?

10 A I forget when I was first elected.

11 Q You were elected. By who?

12 A An officer. By the members of the organization.

13 Q So you were elected to this position in the Arab
14 American Republican Federation --

15 A That's correct.

16 Q -- after you went to work at the Arab American
17 Institute?

18 A Yes.

19 Q Was it in 1985?

20 A It may have been. I don't remember.

21 Q Was it in '86?

22 A I was an officer in '86.

9304350159

1 Q So January of '86 you were an officer?

2 A I don't know if it was January of '86.

3 Q But in '86 --

4 A In 1986.

5 Q In the early part of 1986?

6 A I don't know I believe maybe May, '86.

7 Q In May. So at that point you were working

8 simultaneously at the Arab American Institute and the Arab
9 American Republican Federation. How many hours a week were
10 you at the Arab American Institute, working as a member
11 there?

12 A That was my job. I worked for the AAI.

13 Q How many hours a week?

14 A Full time, 40 hours.

15 Q How much time were you working as secretary of
16 the Arab American Republican Federation a week?

17 A A handful of hours.

18 Q Twenty?

19 A No, I don't think so. It would be less than
20 that probably.

21 Q Now, are you including the time that you're
22 working at the Arab American Republican Federation with the

9304350160

1 time you're working at the Arab American Institute? Or was
2 it separate?

3 (There was had a discussion between
4 the witness and counsel, which was
5 out of the hearing of the court
6 reporter.)

7 THE WITNESS: I was at the AAI 40 hours a week,
8 and some of those hours I would do Republican Federation
9 work.

10 BY MR. MORGAN:

11 Q How many of those hours?

12 A A few hours a week.

13 Q Five?

14 A Maybe. I don't remember exactly.

15 Q I'm trying to get it straight exactly the
16 relationship of the Arab American Institute and the Arab
17 American Republican Federation. I just wonder if you could
18 help me, and I'm just trying to use your employment. Now,
19 I can ask you a question. Okay. You did this work in the
20 same office?

21 A Correct.

22 Q Were there any other workers at the Arab

9304350161

1 American Institute that were officers of the Arab American
2 Republican Federation?

3 A No.

4 Q Where did the other officers of the Arab
5 American Republican Federation work?

6 A They lived in their locales.

7 Q Which were --?

8 A Nader Sayegh worked in Yonkers, New York.

9 Q And his title was --

10 A He was the president or the chairman. I forget
11 exactly. Chairman.

12 Mr. Jwaideh lived in Washington, D. C. Mr.
13 Baroud lived in Illinois. I lived in Arlington, Virginia.
14 Mr. Chaarani lives in Orange County, California.

15 Q Did the Arab American Republican Federation have
16 meetings?

17 A Yes

18 Q Where at?

19 A Washington.

20 Q Where in Washington?

21 A Hotel.

22 Q How often did it meet?

9304350162

1 A Annually.

2 Q What part of the year?

3 A It varied.

4 Q What was the first meeting you attended?

5 A March -- no, May, '86.

6 Q And is that when you were elected secretary?

7 A Yes.

8 Q What was discussed at this May, 1986 meeting?

9 A I don't remember.

10 Q Was the Bush for president campaign discussed?

11 A I don't remember.

12 Q Were there speeches?

13 A I don't remember.

14 Q Do you remember how many members attended the
15 meeting?

16 A No, I don't.

17 Q When was the next meeting?

18 A In 1987.

19 Q When in 1987?

20 A I don't remember. I don't remember the exact
21 date.

22 Q Was it the early part?

9304350163

1 A I think it was the early part.

2 Q Was it in May again?

3 A I don't know.

4 Q Who attended this meeting?

5 A Members of the Federation

6 Q What types of things did you discuss at this
7 meeting?

8 A I don't remember.

9 Q What general things? Did you discuss Republican
10 politics?

11 MR. MAYBERRY: He said he didn't remember.

12 THE WITNESS: I don't remember.

13 BY MR. MORGAN:

14 Q Did you discuss the Bush-Quayle campaign?

15 A I don't remember.

16 Q Were you elected secretary again at this
17 meeting?

18 A I think '86 was the only elections that were
19 held.

20 Q Have there been any elections since then?

21 A No.

22 Q Are you currently national secretary of the Arab

9304350164

1 American Republican Federation?

2 A I guess so.

3 Q Was there a meeting in 1988?

4 A No.

5 Q After that 1987 meeting have there been any
6 other meetings?

7 A No.

8 Q Do you discuss or meet or conference call with
9 the other officers of the Arab American Republican
10 Federation?

11 A No.

12 Q Do they ever come to the Arab American
13 Institute?

14 A I don't know.

15 Q Do you ever meet with them at the Arab American
16 Institute?

17 A No.

18 Q You testified that while working at the Arab
19 American Institute you work forty hours a week and you
20 worked a few hours, as many as five, for the Arab American
21 Republican Federation.

22 A Right.

9304350165

1 Q What did you do?

2 A Basically called Republican clubs just to see
3 what they were doing.

4 Q What types of things were they doing?

5 A Right.

6 Q What was it?

7 A Had they had any meetings, you know, things of
8 that nature.

9 Q Did you ask them to do anything?

10 A We would encourage them to solicit membership.
11 I would encourage them.

12 Q What else did you encourage them to do?

13 A To get involved in local Republican politics.

14 Q How did you become a member of the Arab American
15 Republican Federation?

16 A I had gotten involved in Arab American
17 Republican politics or had met other Arab American
18 Republicans.

19 Q I guess my question is how would others, how
20 would one generally become a member of the Arab American
21 Republican Federation?

22 A I guess they would be encouraged to join by

9304350166

1 people at the local level.

2 Q How could you join?

3 A You join the club, a club of the Federation, a
4 member club of the Federation.

5 Q Did you make a contribution to join these clubs?

6 A There were dues

7 Q How much were the dues?

8 A It varied. The clubs could set their own dues.

9 Q \$50?

10 A It wasn't that.

11 Q Right. That was --

12 A Right. That was for the Federation. Three
13 dollars for Federation dues.

14 Q Let the record reflect that the witness referred
15 to PEC exhibit four, page seven, the Arab American
16 Republican Federation membership card.

17 A Yeah.

18 Q Generally how much did people give to the
19 Federation?

20 A Three dollars.

21 Q Did they make larger contributions?

22 A Generally, no.

9304350167

1 Q What types of projects did the Federation do?

2 A We encouraged -- mainly encouraged Arab
3 Americans to get involved in the political process at the
4 local level to join -- you know, build up membership in
5 these clubs and get involved in the Republican party.

6 Q Did these clubs meet?

7 A It depended on the club.

8 Q Did those clubs have speakers?

9 A I don't know.

10 Q Did you ever book a speaker for a particular
11 club or arrange to have someone come?

12 A Yes.

13 Q Who?

14 A Governor Atiyeh, former governor Victor Atiyeh
15 of Oregon spoke at a Houston Republican Club meeting.

16 Q How did you go about arranging that?

17 A I asked the governor if he would speak at the
18 meeting, and he said yes.

19 Q Was he paid to speak at the meeting?

20 A No.

21 Q Did he speak at any other meetings?

22 A No.

9304350168

1 Q Did you have any other speakers?

2 A That I arranged, no.

3 Q How did you get in touch with Governor Atiyeh?

4 A I called him.

5 Q When did you call him?

6 A I don't know the exact date of that -- of that
7 meeting

8 Q Was it in 1987?

9 A No -- no. I don't believe so.

10 Q '88?

11 A I believe it was, yes.

12 Q Was it during the time of the Bush-Quayle
13 campaign?

14 A No.

15 Q So it was in the winter of 1988?

16 A It would have been in the early part of '88. I
17 don't know the exact date.

18 Q Did you arrange for any other speakers or
19 Governor Atiyeh to speak at any other club?

20 A No.

21 Q Did you try to arrange one?

22 A No.

9304350169

1 Q Do you recall when the Arab American Republican
2 Federation was formed?

3 A March, 1985. The early part of 1985.

4 MR. MORGAN: I'm going to ask the reporter to
5 mark this as FEC exhibit five. I'm handing a copy of FEC
6 exhibit five to Mr. Zogby and his attorney, Mr. Mayberry.

7 (The document mentioned above was
8 marked as FEC Deposition Exhibit No.
9 5 for Identification.)

10 BY MR. MORGAN:

11 Q Could you identify FEC exhibit five.

12 A It's a letter, Arab Americans for George Bush,
13 signed by Governor Atiyeh.

14 Q Did you have anything to do with the
15 preparation?

16 A Yes, I did.

17 Q What did you do?

18 A I -- I set up the second page two and edited the
19 letter.

20 Q Now, when did you do this?

21 A January. That date is wrong. I think it's --

22 Q Excuse me?

9304350170

1 A The date on the letter reads January 4, 1987,
2 and I believe it should read January 4, 1988. And this
3 mailing was put together in December, '87, and early
4 January, '88.

5 Q When you put this mailing together you were
6 working for the Arab Americans for George Bush?

7 A No.

8 Q Who were you working for?

9 A I was an officer in the Republican Federation.

10 Q The Arab American Republican Federation?

11 A And I worked for AAI.

12 Q Well, then what is this Arab Americans for
13 George Bush?

14 (There was had a discussion between
15 the witness and counsel, which was
16 out of the hearing of the court
17 reporter.)?

18 THE WITNESS: I'm sorry. Would you repeat the
19 question?

20 BY MR. MORGAN:

21 Q What is the Arab Americans for George Bush?

22 A It was a name given for this particular mailing.

9304350171

1 Q Given by who?

2 A Created.

3 Q Created by who?

4 A By myself

5 Q Is this Arab Americans for George Bush a part of
6 the Arab American Republican Federation?

7 A No.

8 Q Does it exist as an entity at all?

9 A No.

10 Q Does it have officers?

11 A No.

12 Q Where on this letter does it say that the Arab
13 American Republican Federation was responsible for it?

14 A I don't think that it does.

15 Q Was this post office box established for Arab
16 Americans for George Bush?

17 A Yes.

18 Q Is there a bank account for Arab Americans for
19 George Bush?

20 A No.

21 Q Well, where did this money go?

22 A It went to George Bush for President.

9304350172

1 Q It was George Bush for President. Did you
2 forward the checks to George Bush for President?

3 A Yes, I did.

4 Q How much did you raise with this mailing?

5 A I don't remember.

6 Q \$10,000?

7 MR. MAYBERRY: He said he didn't remember.

8 THE WITNESS: I don't remember.

9 BY MR. MORGAN:

10 Q Was it more than \$10,000?

11 A I don't believe so.

12 Q So it was less than \$10,000?

13 A I don't remember the exact amount.

14 Q When did you receive the money from this effort?

15 A After it went out.

16 Q When was that?

17 A Early 1988.

18 Q Who collected the money from the post office?

19 A I did.

20 Q Where was this post office box located?

21 A Washington Square station.

22 Q Where in Washington is that?

9304350173

- 1 A That is the Washington Square building.
- 2 Q Which is where?
- 3 A Connecticut and "L."
- 4 Q Did anyone else collect the money?
- 5 A No.
- 6 Q Did anyone else handle the money?
- 7 A No.
- 8 Q How often did you collect these funds?
- 9 A Almost daily.
- 10 Q Who authorized you to prepare this letter?
- 11 A No one.
- 12 Q Who else reviewed this letter?
- 13 A Governor Atiyeh.
- 14 Q Did he collect any of the funds?
- 15 A No.
- 16 Q Did anyone else review this letter?
- 17 A No.
- 18 Q Did anyone else help you prepare it?
- 19 A No.
- 20 Q Did you type it?
- 21 A Yes.
- 22 Q Does this post office box still exist?

9304350174

1 A No.

2 Q When did you close it out?

3 A I don't know. I don't remember.

4 Q What was the post office box established for?

5 A To receive funds from this mailing.

6 Q Was anyone in the Bush-Quayle campaign aware of
7 this mailing?

8 A No.

9 Q Who in the Bush-Quayle campaign did you give
10 these funds to?

11 A I believe it was -- I sent them by letter to I
12 believe it was Fred Bush.

13 Q What is his title?

14 A I don't know.

15 Q How often did you send the funds from this
16 mailing to Mr. Bush?

17 A Periodically.

18 Q Every week?

19 A I don't know. Periodically.

20 Q Where did you get the information that you used
21 for this letter?

22 A Governor Atiyeh gave me a draft, and I edited

9304350175

1 it.

2 Q Was Mr. Atiyeh governor at the time?

3 A No. He was a former governor.

4 Q What is his position?

5 A He has his own firm.

6 Q What type of firm?

7 A I don't know.

8 Q Was he a member of the Arab American Republican
9 Federation?

10 A He -- I don't know.

11 Q Was he a member of the Bush-Quayle campaign?

12 A He was an honorary co-chair.

13 Q Of what?

14 A Of the -- no, I'm sorry, he was the honorary
15 chairman of the Arab Americans for Bush-Quayle '88
16 Committee and he was also an honorary chairman of the
17 Coalition of American Nationalities.

18 Q Was he a member of the Arab American Institute?

19 A I don't know.

20 Q Did you meet with him about this fundraising
21 letter?

22 A No

9304350176

1 Q Who from the Bush-Quayle campaign did you meet
2 face to face about this mailing?

3 A It was the Bush campaign at that time.

4 Q Right

5 A I didn't meet with anybody about this.

6 Q Do you know where any of the drafts or any of
7 the information from this mailing is kept?

8 A No.

9 Q Did you keep a record of the funds you received
10 from this mailing?

11 A No.

12 Q Did you send the people any information after
13 they sent the money in?

14 A No.

15 Q How did they know that you received their
16 contribution?

17 A I don't know.

18 Q Did any of them ever call you and ask about it?

19 A No.

20 Q Did anyone from the Bush campaign at the time
21 thank you for the contributions?

22 A No.

9304350177

1 Q Did they give you any type of receipt?

2 A No.

3 Q Well, how did you know they got it?

4 A I don't know.

5 Q You sent --

6 MR. MAYBERRY: Checks

7 (There was had a discussion between
8 the witness and counsel, which was
9 out of the hearing of the court
10 reporter.)

11 BY MR. MORGAN:

12 Q Did you take the funds and put it in a bank
13 account of the Arab American Republican Federation?

14 A No.

15 Q Who were the checks made out to?

16 A George Bush for President.

17 Q All the checks were made out to George Bush for
18 President?

19 A That's correct.

20 Q Where did the list of names come from that you
21 sent this mailing to?

22 A I don't know. I would assume that it would be

9304350178

1 Arab American Republicans

2 Q Do you have a copy of that list?

3 A No, I do not

4 Q Where would one be able to find that list?

5 A I don't know.

6 Q Would Mr. Atiyeh have a list?

7 A No, I don't believe he would.

8 Q Did he suggest you send this to anybody?

9 A No.

10 Q Okay. Let me get this straight about this

11 letter. Mr. Atiyeh sent you a draft of a letter.

12 A That's correct.

13 Q After you made your changes did you send the

14 draft back to him?

15 A Yes.

16 Q Then did he sign it?

17 A He sent me some signatures.

18 Q Did he make any changes to it?

19 A No. Not that I'm aware of.

20 Q What if anything did he say to you?

21 A Nothing.

22 Q Was there a letter accompanying --

9304350179

1 A I may have faxed it to him. I don't know. I
2 don't remember.

3 Q Did he see a copy of the second page of FEC
4 exhibit five?

5 A I believe he did.

6 Q Did he approve this information?

7 (There was had a discussion between
8 the witness and counsel, which was
9 out of the hearing of the court
10 reporter.)

11 THE WITNESS: He didn't give any formal
12 approval.

13 BY MR. MORGAN:

14 Q But did he give you an indication that he
15 thought it was okay?

16 A He didn't give me any indication.

17 Q Did he say he felt it was okay?

18 A Yes.

19 Q He felt it was okay with him?

20 A Yes.

21 Q How did you decide to set this form up the way
22 you did? Where did you get the information?

9304350180

1 A I don't know. I just set it up.

2 Q Based on what?

3 A Based on my own knowledge.

4 Q Why did you want to know the person's
5 occupation?

6 A I believe that's required for any donation to a
7 campaign.

8 Q Required by what?

9 A I think it's federal election law.

10 Q So when you sent this mailing out you were
11 familiar with the federal election law?

12 A No.

13 Q Were you familiar with any aspects of federal
14 election law?

15 A No.

16 Q You just testified that you --

17 A I know from -- I know that when you give
18 political donations they usually -- campaigns will usually
19 ask for your occupation.

20 Q Did you include any of this other information
21 for federal election law purposes?

22 A I'm not sure I understand your question.

9304350181

1 Q You testified that you asked the occupation
2 because it's required by federal election law.

3 A Uh-huh.

4 Q Any of the other questions, the phone number,
5 the address, did you need that for election law purposes?

6 A No.

7 Q What did you do with this letter when they sent
8 it back, this information on here? Did you keep it?

9 A Yes

10 Q What did you do with it?

11 A Well, I filed it.

12 Q Where?

13 A In a file.

14 Q And do you still have copies of it?

15 A No, I do not.

16 Q Where is the file?

17 A I don't know.

18 Q When was the last time you saw that file?

19 A Probably back in early '88.

20 Q Where at?

21 A At my desk

22 Q What desk?

9304350182

1 A My desk at work.

2 Q Where were you working at the time?

3 A The AAI.

4 Q So it's the 16th Street address?

5 A Yes, that's correct.

6 Q Do you think it's still there?

7 A I don't know.

8 Q What was the title of the file?

9 A Arab Americans for George Bush.

10 Q Did you give any of this information to the
11 Bush-Quayle campaign?

12 A I don't believe so, no.

13 Q When you met in May of 1988 with members of the
14 Bush-Quayle campaign were they aware that you had --

15 A No.

16 Q -- done this fundraising effort?

17 A No.

18 Q Did you tell them?

19 A No.

20 Q Why not?

21 A I don't know.

22 Q You didn't tell them, Gee, I raised X amount of

9304350183

1 money for you?

2 A No.

3 Q When you went to work for the Bush-Quayle
4 campaign did you contact any of the people --

5 A No.

6 Q -- that you sent this mailing to? Did you
7 contact Governor Atiyeh?

8 A No.

9 Q When he came a member of the Coalition did you
10 contact him?

11 A Yes, I did. I called him when he was a member
12 of the Coalition.

13 Q When?

14 A Probably before the August announcement with the
15 president -- I mean the vice president.

16 Q What did you talk to him about?

17 A The same that I would ask everybody else, if he
18 would like to join the Coalition of American Nationalities.

19 Q So you were persuading him to join?

20 A No. I asked him if he would like to become a
21 member, and he agreed.

22 Q After he joined how often did you keep in touch

9304350184

1 with him?

2 A Not very often at all.

3 Q Once a week?

4 A Not even that.

5 Q Did you ever meet with him?

6 A No.

7 Q Was he at the August National Press Club
8 meeting?

9 A No.

10 Q Did you ever discuss with him this mailing?

11 A This mailing?

12 Q Yes.

13 A Yes.

14 Q After?

15 A No.

16 Q After you sent it out?

17 A I don't remember.

18 Q What did you discuss with him about this
19 mailing?

20 A I asked him if he would sign it. I had
21 discussed -- the reason he sent me a draft is I asked him
22 if he would draft a letter.

9304350185

1 Q So this was your idea?

2 A Yes.

3 Q Did you discuss it with anyone else?

4 A No.

5 Q Anyone at the Arab American Institute?

6 A No.

7 Q Why did you decide to call Governor Atiyeh?

8 A I don't know.

9 Q Where did you get his name from?

10 A I'd worked with him in the past

11 Q On what?

12 A I guess I just thought he was a prominent member
13 of the community who would be recognized by people.

14 Q Why did you decide to raise money for George
15 Bush?

16 A To show that Arab Americans were doing something
17 for the campaign.

18 Q Did you consider it something you did as an
19 individual?

20 A Yes.

21 Q Was this a product of the Arab American
22 Republican Federation?

9304350186

1 A No.

2 Q But you did it while you were working there?

3 A I did it while I was -- while I was at AAI.

4 Q Did you use the resources of AAI to produce this
5 letter?

6 A I used the computer to type it.

7 Q Did you use the list, mailing list of names from
8 there?

9 A Yes. Republican names. Arab American
10 Republican names.

11 Q So at Arab American Institute there are
12 Republican names and Democratic names?

13 A They have a mailing list that can differentiate
14 Republicans and Democrats, whatever.

15 Q I see. So the Arab American Institute does
16 advocacy for both Republicans and Democrats?

17 A No.

18 Q For which group?

19 A Neither. It's nonpartisan.

20 Q It's nonpartisan, but the Arab American
21 Republican Federation works out of that office. Is that
22 correct?

9304350187

1 A That's correct.

2 Q Is there an Arab American Democratic Federation?

3 A Yes.

4 Q Does that work out of that office?

5 A Yes.

6 Q I see. So you took the Arab American Republican
7 list.

8 A Correct.

9 Q And used it for this mailing.

10 A Correct.

11 Q How many people did you send it to?

12 A I believe it's answered in --

13 Q No, it's not.

14 A I believe it is. It is answered.

15 (There was had a discussion between
16 the witness and counsel, which was
17 out of the hearing of the court
18 reporter.)

19 MR. MORGAN: It's not in here.

20 THE WITNESS: Yes, it's answered in the
21 interrogatories.

22 BY MR. MORGAN:

9304350188

1 Q Is it FEC exhibit five, the mailing referred to
2 in question four in interrogatory A-1?

3 A Yes.

4 Q So these funds, the funds to produce the mailing
5 were reimbursed by the Bush-Quayle campaign?

6 A Yes.

7 Q When?

8 A I don't know. It was reimbursed, though.

9 Q How did they know to reimburse you for it?

10 (There was had a discussion between
11 the witness and counsel, which was
12 out of the hearing of the court
13 reporter.)

14 THE WITNESS: I had sent the mailing out and I
15 was sending the returns over to the Bush campaign, and this
16 Arab -- on Arab Americans for George Bush letterhead and
17 stationery, and they saw that Arab -- they saw Arab
18 Americans for George Bush and realized that it was
19 something that I should not have been doing, called me in
20 on the carpet and -- and I guess they made the decision
21 that they would reimburse us.

22 BY MR. MORGAN:

9304350189

1 Q Okay. When did they call you in?

2 A After the mailing had gone out.

3 Q In January, 1988?

4 A I don't remember. It was the early part of
5 1988

6 Q Who did you meet with?

7 A I spoke with Edie Halliday

8 Q What is her title?

9 A I don't remember

10 Q Where did she call you in at? Where was the
11 meeting?

12 A I spoke with Edie on the phone and subsequently
13 met with Judy McClennon.

14 Q What was her title?

15 A I don't know.

16 Q Where did you meet with Ms. McClennon?

17 A At the Bush campaign.

18 Q At the Bush campaign headquarters?

19 A Yes.

20 Q On 15th Street?

21 A Yes.

22 Q Was anyone else at the meeting?

9304350190

1 A Pat O'Brien.

2 Q What was his title?

3 A I don't know.

4 Q Who else?

5 A That's all.

6 Q What did they discuss with you?

7 A That I shouldn't have sent out the mailing.

8 Q What did they say?

9 A That I shouldn't have sent out the mailing, the
10 campaign is going to have to reimburse, which they did.

11 Q What else did they say?

12 A That was all.

13 Q How long was the meeting?

14 A Not very long.

15 Q An hour?

16 A Half an hour maybe.

17 Q Did they reimburse you personally?

18 A No.

19 Q So this \$1,988 that's listed here in question
20 4-A-1 of the respondent's answers to the Commission's
21 interrogatories was spent on that mailing?

22 A It was paid for that mailing, yes.

9304350191

1 Q So how much did the Arab American Republican
2 Federation pay for the mailing?

3 A Zero.

4 Q I don't understand. Why did they, the
5 Bush-Quayle campaign --

6 A They reimbursed for printing and postage

7 Q How much was that?

8 A \$1,988.26.

9 Q Who paid that?

10 A The Bush-Quayle campaign.

11 Q Who paid it when the mailings were sent out?

12 A That -- the money was raised.

13 Q By who?

14 A By me.

15 Q Through what organization?

16 A Through my own auspices.

17 Q How did you get in touch with these people?

18 A I called them.

19 Q Where did you call them from?

20 A My home.

21 Q Did you call any of them from the Arab American
22 Institute?

9304350192

1 A I called Arab American Republicans.

2 Q From the list you obtained where?

3 A From the Arab American Republicans.

4 MR. MAYBERRY: Could we have another break at
5 this point?

6 MR. MORGAN: Sure

7 (A recess was taken, after which the
8 following proceedings were had:)

9 BY MR. MORGAN:

10 Q Let's go back to FEC exhibit five. You
11 testified that the Bush-Quayle campaign reimbursed the Arab
12 American Republican Federation for the mailing?

13 A Yes.

14 Q So the Arab American Republican Federation paid
15 for the mailing originally?

16 A No. I saw Governor Atiyeh in my own mind as a
17 way to energize Arab Americans to get them involved in
18 politics, the Republican party. I called the governor and
19 told him that I wanted to, you know, raise our visibility,
20 that I had this mailing in mind. I asked him if he would
21 agree to sign a letter that I could send to Arab American
22 Republicans to help raise money for the mailing. He

9304350193

1 agreed. Did the letter, sent that out. I followed up with
2 phone calls --

3 Q Phone calls to who?

4 A To these Arab American Republicans who got this
5 letter from the governor saying, you know, we want to do
6 this mailing, can you help us out to pay for it. They
7 agreed. Some sent in checks

8 Q To who?

9 A Well, the only -- they sent them to me, but they
10 -- and they were deposited in the Arab American Republican
11 Federation account.

12 Did the mailing --

13 Q With what funds?

14 A With those funds that I had received from
15 individuals that I had sent out the letter with the
16 governor's name.

17 Q So how much did you receive for the mailing?

18 A I don't know.

19 Q To prepare the mailing.

20 A I don't know. It covered the cost of the
21 mailing, I know that.

22 Q So --

9304350194

1 A It was at least nineteen eighty-eight thirty-six
2 -- or twenty-six, sorry.

3 Q Was it more?

4 A It may have been.

5 Q What happened to the excess?

6 A I probably left it in the Federation account.

7 Q So the Bush-Quayle campaign reimbursed who?

8 A They made the check out to the Arab American
9 Republican Federation.

10 Q So what was done with the funds then?

11 A Deposited in the Arab American Federation
12 account.

13 Q Did these people who paid for the mailing get
14 their money back?

15 A No.

16 Q Did they know that the money was reimbursed by
17 the campaign?

18 A No.

19 Q Did you get in touch with any of them?

20 A No, I did not.

21 Q You say you were called in on the carpet by the
22 campaign. What about Governor Atiyeh?

9304350195

1 A No.

2 Q Did you ever discuss it with him?

3 A I noted to him that there was a problem with it
4 and it was something we shouldn't have done according to
5 the Bush campaign and they would have to reimburse us for
6 it.

7 Q When did you tell him that?

8 A After I had met with the campaign or had spoken
9 with the campaign.

10 Q Did you meet him in person?

11 A No. On the phone.

12 Q What was his reaction?

13 A He didn't really have any reaction.

14 Q Did you spend any of your own funds on this
15 mailing?

16 A No, I did not.

17 Q Did you do anything else like this? Did you
18 send out any other letters, raise any other funds?

19 A I sent out a mailing for membership, I believe.

20 Q When did you send that out?

21 A It was in the early part of '88.

22 Q Would that be included in your response?

930-4350196

1 A I don't know.

2 Q What membership?

3 A Using this membership card.

4 Q So you solicited --

5 (There was had a discussion between
6 the witness and counsel, which was
7 out of the hearing of the court
8 reporter.)

9 THE WITNESS: Right.

10 MR. MORGAN: Go ahead

11 THE WITNESS: I'm sorry.

12 (There was had a discussion between
13 the witness and counsel, which was
14 out of the hearing of the court
15 reporter.)

16 THE WITNESS: I think we answered it. I think
17 it may be in the interrogatories.

18 MR. MAYBERRY: That looks like it.

19 MR. MORGAN: Do you have the response?

20 MR. MAYBERRY: Pardon me?

21 MR. MORGAN: Do you have a copy of the response?

22 MR. MAYBERRY: I don't know. Let me see what it

9304350197

1 looks like.

2 MR. MORGAN: Let the record reflect that we're
3 referring Mr. Zogby to the respondent's response to the
4 Federal Election Commission interrogatories.

5 THE WITNESS: Yeah, it's -- right, this is the
6 membership card that was sent with that mailing also
7 (indicating).

8 MR. MORGAN: Let the record reflect that the
9 witness is referring to the membership card that was
10 enclosed on FEC exhibit four.

11 MR. MAYBERRY: Excuse us a minute.

12 (There was had a discussion between
13 the witness and counsel, which was
14 out of the hearing of the court
15 reporter.)

16 MR. MAYBERRY: Thank you.

17 THE WITNESS: I'm sorry.

18 BY MR. MORGAN:

19 Q When did you send out the membership card?

20 A It was sent in -- I had a bunch printed up when
21 I did this first mailing -- or no, not this mailing but
22 another mailing, and used them when I had them.

9304350198

1 Q How often did you send them out?

2 A There was just a couple mailings, I think.

3 Q When?

4 A I don't know the exact dates. I don't remember
5 the exact dates.

6 Q The early part of 1988?

7 A Yes.

8 Q January, 1988?

9 A It probably would have been after January

10 Q February, 1988?

11 A I don't remember.

12 Q Did you include anything else when you sent the
13 card out? Was there a letter?

14 A A cover letter, I guess.

15 Q On what letterhead?

16 A I didn't just send the card alone.

17 Q Who did you send the letter and the membership
18 card to?

19 A Arab American Republicans.

20 Q How did you get their names?

21 A Arab American Republican Federation.

22 Q From the list of Arab American --

9304350199

1 A Republicans.

2 Q Let me get this straight: You sent out FEC
3 exhibit five. Right?

4 A That's correct. That's correct.

5 Q The Arab Americans for George Bush. You sent
6 that out on your own with Governor Atiyeh.

7 A Right.

8 Q Did you send out any other mailings on the
9 letterhead of Arab Americans for George Bush?

10 A No.

11 Q To your knowledge did Governor Atiyeh send out --

12 A No, not to my knowledge.

13 Q Did anyone else have access to the Arab
14 Americans for George Bush letterhead?

15 A No.

16 Q Where was it kept?

17 A I had it.

18 Q Where?

19 A Some at my office, some at my home.

20 Q Okay. Now, while you were doing this
21 fundraising activity for Arab Americans for George Bush,
22 your own created organization, what were you doing for the

930-4350-200

1 Arab American Republican Federation or what was the Arab
2 American Republican Federation doing for George Bush in
3 1988?

4 A The Federation nationally was not doing
5 anything.

6 Q The Federation in Washington, D. C.?

7 A That's correct.

8 Q What was it doing locally?

9 A That was up to local individuals to the extent
10 of who they wanted to support or do.

11 Q Were you doing anything for the --

12 A No.

13 Q -- Bush-Quayle campaign through the Arab
14 American Republican Federation?

15 A No.

16 Q In the summer of 1988 did the Arab American
17 Republican Federation become involved with the Bush
18 campaign?

19 A I'm sorry. Could you repeat that?

20 Q In the summer of 1988 did the Arab American
21 Republican Federation become involved with the Bush-Quayle
22 campaign or the Bush campaign?

9304350201

1 A No.

2 MR. MORGAN: Can we take a break?

3 (A recess was taken, after which the
4 following proceedings were had:)

5 BY MR. MORGAN:

6 Q I want to clear up a couple things about the FEC
7 exhibit five, --

8 A Okay.

9 Q -- the fundraising letter that you sent out.
10 You testified that you raised funds in order to be able to
11 send this letter out. Is that correct?

12 A That's right.

13 Q Who did you raise the funds from?

14 A Arab American Republicans.

15 Q How did you get their names?

16 A The Arab American Republican list.

17 Q How many people did you contact?

18 A I don't remember.

19 Q Did you send them a letter?

20 A I believe we sent them a letter from Governor
21 Atiyeh.

22 Q Do you have a copy of that letter?

9304350202

1 A No, I don't.

2 Q Where would I be able to get a copy of that
3 letter?

4 A I don't know.

5 Q Governor Atiyeh?

6 A I don't know.

7 Q The Arab American Republican Federation? Would
8 they have a copy?

9 A I don't know.

10 Q When was the last time you saw the letter
11 copies of the letter?

12 A Early in 1987. Or 1988. I'm sorry.

13 Q Did you call any of these individuals on the
14 phone?

15 A Yes, I did.

16 Q How many?

17 A I don't remember.

18 Q How much money did you raise in that effort?

19 A At least enough to pay for the mailing.

20 Q How much was that?

21 A Again, it was the --

22 Q The one thousand --

9304350203

1 A The nineteen eighty-eight twenty-six.

2 Q Was the group that you contacted in order to
3 raise the funds for the mailing the same group you raised
4 funds from later?

5 A Some of them were yes.

6 Q Were there more people later on when you raised
7 funds for the Bush campaign --

8 A Right.

9 Q -- as opposed to raising funds --

10 A With this letter (indicating).

11 Q With that letter, the FEC exhibit five. How
12 many people did you send that to?

13 A That's on that -- that's answered in the
14 interrogatories. I don't know the exact number.

15 Q Was it more or less than the number of people
16 you contacted in early January, 1988, and late December,
17 1987, to raise funds to send out the letter?

18 A It was -- it was more.

19 Q How many more?

20 A A number. A lot more.

21 Q Let's move to the activities of the Arab
22 American Republican Federation in 1988. Did the Arab

9304350204

1 American Republican Federation act on behalf of the
2 Bush-Quayle campaign?

3 A No.

4 MR. MORGAN: I hand the reporter FEC exhibit
5 six, and hand a copy of FEC exhibit six to Mr. Zogby and
6 his attorney, Mr. Mayberry.

7 MR. MAYBERRY: Thank you.

8 (The document mentioned above was
9 marked as FEC Deposition Exhibit No.
10 6 for Identification.)

11 BY MR. MORGAN:

12 Q Could you identify FEC exhibit six?

13 A It's an Arab American Republican Federation
14 election '88 report, dated May, 1988.

15 Q Have you seen FEC exhibit six before?

16 A Yes.

17 Q When?

18 A I prepared it.

19 Q When did you prepare it?

20 A In May of 1988.

21 Q What was the purpose of FEC exhibit six?

22 A It's an informational piece that was sent to

9304350205

1 Arab American Republicans.

2 Q How much did it cost to prepare?

3 A I don't know.

4 Q How much time did you spend preparing it?

5 A I don't -- I don't remember

6 Q How many of these types of news releases did you
7 prepare?

8 A Several.

9 Q One every week?

10 A No. Once a month.

11 Q Did they only deal with Vice President Bush?

12 A No. They dealt with the 1988 election process.
13 The Republican election process.

14 Q Was its purpose to advocate Vice President
15 Bush's election?

16 A No.

17 MR. MORGAN: Can I have this marked as FEC
18 exhibit seven by the reporter, and I hand a copy of FEC
19 exhibit seven to Mr. Zogby and his attorney, Mr. Mayberry.

20 (The document mentioned above was
21 marked as FEC Deposition Exhibit No.
22 7 for Identification.)

9304350206

1 BY MR. MORGAN:

2 Q Mr. Zogby, can you identify exhibit --

3 A It's an Arab Republican Federation election
4 report for April 1988.

5 Q Did you prepare it?

6 A Yes, I did.

7 Q When did you prepare it?

8 A In April of 1988

9 Q How much time did you spend in preparation?

10 A I don't remember.

11 Q Can you describe the purpose of FEC exhibit
12 seven?

13 A Again, informational mailing to Arab American
14 Republicans on the 1988 Republican election process.

15 Q Was the purpose of FEC exhibit seven to advocate
16 the election of Vice President Bush?

17 A No, it was not.

18 Q Did the Arab American Republican Federation send
19 out any other mailings during April, 1988?

20 A I don't remember.

21 Q Did you participate in the distribution of any
22 mailings by the Arab American Republican Federation?

9304350207

1 A I distributed this mailing (indicating).

2 Q And may the record reflect the witness is
3 referring to FEC exhibit seven.

4 Did you work on any other mailing?

5 A I don't remember.

6 MR. MORGAN: I ask the reporter to mark this FEC
7 exhibit eight, and I hand a copy of FEC exhibit eight to
8 Mr. Zogby and his attorney, Mr. Mayberry.

9 (The document referred to above was
10 marked as FEC Deposition Exhibit No.
11 8 for Identification.)

12 BY MR. MORGAN:

13 Q Could you identify FEC exhibit eight?

14 A It's an invitation to a reception at the
15 Republican national convention.

16 Q Who sent the invitation out?

17 A The Arab American Republican Federation.

18 Q What was the purpose of the event that this
19 invitation was in reference to?

20 A To show that Arab Americans were participating
21 in the convention, present at the convention.

22 Q Was it to show their support or advocate the

9304350208

1 election of George Bush?

2 A It was to show their visibility within the
3 Republican party.

4 Q Did you attend this reception?

5 A Yes

6 Q Were there speeches made at the reception?

7 A Yes

8 Q Who made them?

9 A George Salem, and --

10 Q Who was he? I think you identified him earlier.

11 A Yes. George was an Arab American Republican.

12 Q Did he hold a position in the Bush-Quayle
13 campaign?

14 A He later became the chairman of the Arab
15 Americans for Bush-Quayle '88 Committee and was also a
16 member of the Coalition of American Nationalities.

17 Q Did anyone else make a speech?

18 A Governor Sununu.

19 Q What was the substance of his speech?

20 A I don't remember.

21 Q Anyone else?

22 A Lorette Ruby and George Bush, Jr.

9304350209

1 Q Mr. Lorette and Mr. Ruby --

2 A No, Lorette, it's a she.

3 Q I'm sorry. What was the nature of her speech?

4 A She was just recognized and got up and said

5 thank you

6 Q What was her title?

7 A I don't remember

8 Q At the time you attended this reception you were

9 a volunteer at the Bush-Quayle '88 campaign?

10 A That's correct.

11 Q You were also working for the Arab American

12 Republican Federation?

13 A I was an officer in the Federation.

14 Q And you also worked at the Arab American

15 Institute.

16 A That's correct.

17 Q What other activities did the Arab American

18 Republican Federation engage in on behalf of federal

19 candidates in 1988?

20 A I believe that was answered in the

21 interrogatories.

22 Q Can you recall what that answer was?

9304350210

1 A I know that I did answer it.

2 Q Did you personally work as a secretary of the
3 Arab American Republican Federation? Did you personally
4 work on any other federal campaign?

5 A Not outside of my volunteer activities with the
6 Bush campaign.

7 Q To your knowledge did the Arab American
8 Republican Federation accept funds from any corporations?
9 Again, this may have been in the interrogatories, but to
10 your knowledge for the record.

11 A I don't know.

12 Q Did the Arab American Republican Federation
13 accept funds from any political action committees?

14 A No.

15 Q Did the Arab American Republican Federation
16 accept funds from any labor unions?

17 A No.

18 Q To your knowledge did the Arab American
19 Republican Federation take out any loans?

20 A No.

21 Q Not to your knowledge or no, they didn't?

22 A Not to my knowledge.

9304350211

1 Q We discussed this gala, the gala reception the
2 Arab American Federation had in FEC exhibit eight. What
3 other activities did the Arab American Republican
4 Federation engage in at the convention?

5 A This was the extent of it

6 Q Did the Bush-Quayle campaign approve this
7 reception?

8 A I don't know.

9 Q Did they participate or encourage it?

10 A George Bush, Jr., participated in the convention
11 -- in the reception.

12 Q Was he paid for his appearance?

13 A No.

14 Q Did the Bush-Quayle campaign give the Arab
15 American Republican Federation any funds for this gala?

16 A No.

17 Q What other things did the Arab American
18 Republican Federation do to support Arab delegates or to
19 help Arab delegates become elected to the convention,
20 Republican convention?

21 A Nothing.

22 Q In your response to the Commission's

9304350212

1 interrogatories, question 4-A-3, you state that the Arab
2 American Republican Federation purchased campaign buttons
3 for the -- from the Republican national convention --

4 A For the convention.

5 Q Where were the buttons purchased?

6 A I believe you have a copy of that in the
7 documents. I don't remember the company.

8 Q I have a copy of the buttons. Did you
9 participate in the purchase of the buttons?

10 A Yes.

11 Q In purchasing the buttons did you participate in
12 the purchase of them as a member of the Bush-Quayle '88
13 campaign or a member of the Arab American Republican
14 Federation?

15 A As a member of the Arab American Republican
16 Federation.

17 Q Did the Coalition of American Nationalities have
18 anything to do with the purchase of the buttons?

19 A No, they did not.

20 Q In response to FEC question seven, interrogatory
21 seven, you state that the Arab American Republican
22 Federation had no formal relationship with the Bush-Quayle

9304350213

1 '88 campaign. Was there an informal relationship with the
2 campaign?

3 A I was a volunteer for the campaign

4 Q Was there any other link between the Arab
5 American Republican Federation?

6 A Beyond Mr. Chaarani, who later became a member
7 of the Coalition of American Nationalities, no formal
8 relationship.

9 Q How about Mr. Atiyeh?

10 A I guess that would apply to Mr. Atiyeh also.

11 Q He was a member of both?

12 A Well, he was a -- he assisted me as I've
13 described, and he also came to be a member of the Coalition
14 of American Nationalities.

15 Q Was he a member of the Arab American Republican
16 Federation?

17 A I don't know.

18 Q Did the Arab American Republican Federation ever
19 considering registering with the Federal Election
20 Commission as a political committee?

21 A No.

22 Q Why not?

9304350214

1 A I don't know.

2 Q As a member of the Bush-Quayle campaign what did
3 you know about the Federal Election Campaign Act?

4 A Not very much.

5 Q Well, what little did you know?

6 A Limit -- very, very limited knowledge

7 Q What knowledge was that?

8 A I guess I really didn't know anything

9 Q Were you aware that the Federal Election
10 Campaign Act requires an organization that spends or
11 receives more than a thousand dollars in a federal election
12 is required to register and report with the Commission?

13 A No.

14 Q Can you describe the current activities of the
15 Arab American Republican Federation?

16 A No.

17 Q Do you know if the Arab American Republican
18 Federation has any kind of debt at the moment?

19 A I don't know.

20 MR. MORGAN: Mr. Mayberry, you can ask the
21 witness questions.

22 MR. MAYBERRY: I have no questions. I think you

9304350215

1 covered the area very thoroughly.

2 MR. MORGAN: I'm required by the Federal
3 Election Campaign Act to tender to you a check for witness
4 fee and mileage fee. I have given Mr. Zogby a check for
5 \$30.67.

6 Would you like to review and sign a copy of the
7 deposition?

8 MR. MAYBERRY: One minute, please.

9 (There was had a discussion between
10 the witness and counsel, which was
11 out of the hearing of the court
12 reporter.)

13 MR. MAYBERRY: If we waive it, would we still
14 get a copy of it at the same time it is provided to you?

15 MS. MILLER: I think we can do that.

16 MR. MAYBERRY: Then we'd waive the reading and
17 signature.

18 MR. MORGAN: Thank you for your time. This
19 deposition is continued, so we'll get in touch with you if
20 we need any more questions answered.

21 MR. MAYBERRY: When you say it's continued, why
22 is it continued?

9304350216

1 MR. MORGAN: It's not adjourned. If we need any
2 more information, we'll get in touch.

3 MR. MAYBERRY: When do you intend to adjourn it?

4 MR. MORGAN: After we review the transcripts,
5 the responses, and we decide whether or not we need any
6 more information at that time.

7 MR. MAYBERRY: I see. We of course would like
8 it adjourned as soon as possible to move on to other
9 things.

10 MR. MORGAN: We'll take that into consideration.

11 MR. MAYBERRY: I'm sure you will. Thank you.

12 MR. MORGAN: Thank you.

13 (In the presence of counsel for the
14 respective parties, the witness
15 waived reading and signing of the
16 deposition.)

17 (At 1:47 p.m., the taking of the
18 deposition was suspended.)

19 -o000o-

20

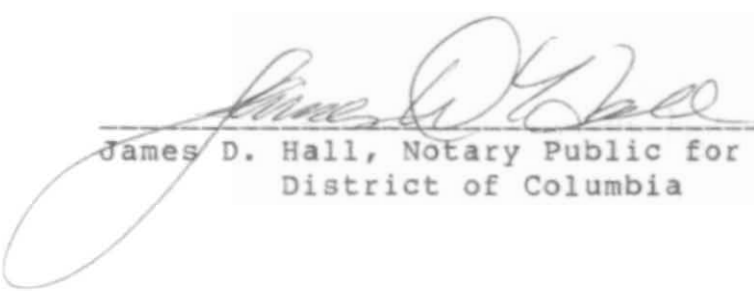
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9304350217

CERTIFICATE OF NOTARY PUBLIC

I, James D. Hall, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in shorthand and thereafter reduced to typewriting under my supervision; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken, and further that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.


James D. Hall, Notary Public for the
District of Columbia

My Commission Expires:

March 19, 1992

9304350218

Bush 88 Quayle



10.12.88

Mr. Chirgotis -

Here's 250 pieces of Greek American
Committee letterhead with envelopes.

Sorry for the delay in getting this
to you - problems with volunteers.

If you need any more materials
please don't hesitate to call

Charles Zogby

Bush 88 Quayle

Charles Zogby
National Voter Coalitions

733 15th St., N.W.
Washington, D.C. 20005

(202) 624-8601 ext. 5029
T.D.D. (202) 393-6471

Bush 88 Quayle

Coalition of American Nationalities



DEAR HELLENE:-

Greek Americans

Honorary Chairs

Rep. Michael Bilirakis
Rep. George Gekas
Rep. Olympia Snowe
William P. Tavoulareas

Chair

William Chirgotis

Co-Chairs

Alec P. Courtelis
Adeline Geo-Karis
John N. Parker Esq.
Dr. Theodore Perros
Dr. John Skandalakis

Vice Chair

Kris Anne Vogelpohl

On November 8, Americans will go the polls to elect a new President. Each of us has the responsibility to evaluate the qualifications of the nominees and then to vote for the person who is best suited to lead the nation for the next four years.

I am an American of Greek descent, and very proud of my heritage. Throughout my professional career as an architect, I have always participated actively in community affairs, the programs of my Church, and in the Order of Ahepa for which I was privileged to serve as the Supreme President. I mention this not for any self-serving purpose but merely to acquaint you with my background.

Governor Dukakis has frequently spoken of his Greek heritage. We all are justifiably proud that a Hellene has been nominated for the highest office in the land. But that alone should not be the criterion by which selection to the Presidency should be made. Experience as a Governor cannot be compared to service in Congress, Director of the CIA, and eight years as Vice President which George Bush has experienced. But more importantly, the achievements of the Reagan-Bush ticket, during the past eight years, in reducing taxes, unemployment, interest rates, inflation, and successes in foreign affairs including a treaty with the Soviet Union for reduction of nuclear weapons, all of these and more, has convinced me that George Bush must be elected President.

Because I and other Greek-Americans wish to convey this message to the Greek-American community, we are seeking contributions from all who endorse our position to defray the costs for placements of ads in the 13 Greek publications throughout the country. A contribution payable to "Greek Americans for Bush" is respectfully and urgently solicited. For your convenience a self-addressed envelope is herewith enclosed. An itemized record of receipts and expenses will be mailed to you after the election.

Sincerely,

William G. Chirgotis
William G. Chirgotis

\$10.00 _____ \$25.00 _____ \$50.00 _____ \$100.00 _____

Bush 88 Quayle



October 12, 1988

MEMORANDUM TO: ALL NATIONAL AND STATE COALITION LEADERS
FROM: CECI COLE MCINTURFF
DIRECTOR FOR NATIONAL VOTER COALITIONS

As we head into the last three and a half weeks of the campaign, I thought it might be useful to reiterate certain important principles and constraints imposed by Federal election law on Bush-Quayle coalition activities. While these requirements and limitations are no doubt familiar to most of you by now, they bear repeating to help ensure that the campaign is protected against any allegations of wrongdoing in these final, critical days.

First, we should always bear in mind that Bush-Quayle and Victory '88 are separate and distinct activities, subject to different legal requirements, performing different functions and serving related but independent purposes. Individual coalition members, like other volunteers (and unlike Bush-Quayle staff), may at different times act on behalf of either Bush-Quayle or Victory '88. You may not, however, act on behalf of both entities at one time. When you act on behalf of Bush-Quayle, you should always be mindful of the special constraints and requirements that Federal law as well as Bush-Quayle campaign policy place on your activities. If and when, on your own, you act in support of Victory '88 you should bear in mind that you are not at that point representing Bush-Quayle, as a Coalition member or otherwise.

All coalition members should bear in mind the following rules as they engage in various campaign activities:

1. Direction and Control of Victory '88

While Victory '88 offices are properly coordinating their activities with the campaign, all authority for Victory '88 programs and expenditures properly rests with state party officials.

2. Fundraising

Any fundraising activity may be undertaken only by Victory '88, not by Bush-Quayle or its representatives. While you as a campaign volunteer are free, on an individual basis, to assist Victory '88's fundraising

ATTACHMENT

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Memorandum to All National and
State Coalition Leaders
October 12, 1988
Page 2

efforts, it should be understood that you are not doing so on behalf of Bush-Quayle. Furthermore, any funds raised for state party Victory '88 accounts may not be specifically "earmarked" for Bush-Quayle expenditures. Obviously funds must be raised in accordance with the applicable Federal and state laws: Victory '88 legal counsel should be consulted as appropriate.

3. Travel Expenses

Travel expenses of Bush-Quayle employees and representatives must be paid by the campaign or (within a \$1000 per person ceiling) by the traveling individuals themselves. Victory '88 funds may not be used to pay for the travel of Bush-Quayle employees and representatives. Victory '88 may offer to pay for travel of individual Bush-Quayle coalition members, and such travel expenses may be accepted, only in those circumstances where the individual is appearing on behalf of Victory '88, the Republican National Committee or some other entity, not on behalf of Bush-Quayle. (A memorandum on the travel expenses of Bush-Quayle representatives is attached.)

4. Pamphlets, Brochures and other Distributional Materials

Victory '88 may reproduce Bush-Quayle campaign materials for dissemination by Victory '88 volunteers as Victory '88 deems appropriate (with appropriate disclaimers by Victory '88). Victory '88, however, should not be asked to pay Bush-Quayle bills for materials being prepared by Bush-Quayle coalitions for Bush-Quayle use.

Legal Guidance

State party officials and their legal counsel are working to ensure that Victory '88 activities are undertaken in accordance with applicable legal requirements. Questions regarding Victory '88 activities should be directed to them. All questions concerning the legal authority for Bush-Quayle coalition activities should be directed to the office of Jan W. Baran, General Counsel to Bush-Quayle: (202)383-4941. No one is authorized to provide legal advice or representation to Bush-Quayle without prior clearance by the General Counsel.

(2)

Arab American
Republican
Federation



October 19, 1988

Dear Arab American Republican,

Election day is near, and as usual, all of us are surrounded by political activity. This year's presidential election will likely shape the future direction of our country for many years. That is why political involvement, especially **voting**, is so important.

In the past, many of us have rallied behind important causes. This year, we realize that the presidential campaign has not generated the expected enthusiasm. Yet, as an Arab American community, we must not use this as an excuse to remain on the sidelines. Our goal of full **political empowerment** for Arab Americans is more critical than ever.

With that in mind, we have forwarded some information that we feel will be helpful. Enclosed is an issue sheet outlining some of Vice President Bush's stances on important issues of concern to Arab Americans. Also enclosed is an open letter to Arab Americans from former Congressman Paul Findley explaining why he thinks George Bush is the best candidate for President. We hope this information will help you generate support for Vice President Bush. If we sit this one out, the only losers in the end will be ourselves. Remember, the big picture is **Arab American political empowerment!**

Therefore, we urge you to get involved - to take the lead in local and state efforts in your area. We encourage you to help organize Arab Americans in you community and to build relations with your local, county and state Republican parties. With a **formalized and institutionalized presence**, we will continue to make an impact long after 1988. Each year we are getting stronger, but we need to broaden our base and stay involved.

One way we can continue to organize is to build and expand the **Arab American Republican Federation**. Enclosed is a Federation brochure. Please take the time to join or renew your membership. The fee is minimal. This will greatly assist us in

(1)

keeping track of Arab American Republican affairs across the country and in the broadening and development of local Republican clubs or organizations.

Also included is a copy of a press release we sent out announcing the formation of the Arab American for Bush/Quayle Committee. Please feel free to call us with any comments or questions at (202) 429-9210. Your input and participation are greatly appreciated.

Sincerely,

Mike

Mike Sarafa

[Signature]

Charles Zogby

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VICE PRESIDENT GEORGE BUSH ON ISSUES
OF CONCERN TO ARAB AMERICANS

Arab Americans face a choice between two very different candidates this November when they go to the polls to determine who will lead this nation for the next four years. But there is only one candidate whose record and message of traditional values, of God, family and economic opportunity reflect the values of Arab Americans. That candidate is George Bush. Below are George Bush's positions on issues of concern to Arab American voters.

o The Middle East Peace Process

While Arab Americans have expressed concern over George Bush's Middle East policy, statements the Vice President has made on the issue are stronger and more positive than that of his opponent. While George Bush has said that he does not support a Palestinian state, he has at the same time stated that if the parties to any negotiations agree that there should be a state that he would not oppose it. George Bush also opposes moving the U.S. Embassy to Jerusalem. Michael Dukakis says he supports the move.

"The Palestinians must be involved at every step in the negotiations. There will be no peace without them. But we must be clear on another matter too. The annexation of the territories by Israel or their permanent control by military occupation" will not lead to peace. 9/7/88

o Lebanon

George Bush is committed to an independent, peaceful and democratic Lebanon. George Bush believes that U.S. policy should be based on the principles of preserving the unity of Lebanon; recognition of and respect for the territorial integrity of Lebanon and the reassertion of Lebanese sovereignty. George Bush has stated that he has a personal, special investment in a Lebanon at peace.

o George Bush on Values, the Individual and Family

"My view of America's future... means viewing government as the last, not the first, recourse in solving problems. I believe, as did Jefferson and Lincoln, that the sole purpose of government is to do for people what they can't do for themselves; that political and social freedom is tied to economic freedom; and that the proper role of a President is to develop a domestic and social agenda to improve the quality of American life through a free, competitive market place, not only of products but ideas ..[E]ach individual is entitled to a fair opportunity to fulfill his or her God-given potential." From "Looking Forward" by George Bush

3

o George Bush on Racism and Bigotry

"I hope to stand for a new harmony, a greater tolerance. Racism has no place in American society. We've come far, but I think we need a new harmony among the races in our country. We're on a journey to a new century, and we've got to leave the tired old baggage of bigotry behind. I want a kinder, gentler nation." 8/18/88

o George Bush on Business and the Economy

George Bush is committed to keeping our economy on the path that has created 18 million new jobs, the majority of these jobs coming from growth in small businesses. George Bush is the only candidate that has promised NOT TO RAISE TAXES. George Bush supports a balanced budget amendment to the constitution, the line-item veto to reduce spending and a cut in the capital gains tax rate to encourage investment and business formation.

o George Bush on Education

"Our program for the future must be built around a strategy of investing in our children. Support for educational excellence will be a primary goal of a Bush Administration because teachers, schools, colleges and universities are so vitally important to the character, strength, and quality of our society and nation." George Bush Issue Statement, 1980

George Bush believes America must invest in education and supports an emphasis on the basics, seeking to strengthen our traditional educational values. George Bush proposes college tax-free savings bonds to help families save for their children's college education. George Bush supports the right for children to pray in school.

o George Bush on Crime and Drugs

"Fighting crime must be a high priority for the next four years. Let's close the loopholes that let crooks go free to repeat their offenses. I want to stop hamstringing our police. Let's strengthen the laws that protect the victim, not the criminal." George Bush Issue Statement, 1980

George Bush supports mandatory sentencing for criminals, has said no to furloughs for killers and will appoint judges who will crack down on criminals. George Bush also supports drug education as part of the curriculum at every level of the public schools.

Arab American Supporters for George Bush
918 16th Street, NW, Suite 501
Washington, DC 20006

4

AN OPEN LETTER TO THE ARAB AMERICAN COMMUNITY
FROM CONGRESSMAN PAUL FINDLEY ON THE
1988 PRESIDENTIAL ELECTION

Dear Friends,

While lacking Arab ancestry -- I wish I had some to brag about! -- I feel very much an Arab American in spirit. My endeavors for peace and justice in the Middle East since 1973, including my book, They Dare to Speak Out: People and Institutions Confront Israel's Lobby make me strongly sympathetic to Arab grievances.

As a 22-year Republican veteran of Congress, I recognize the crucial importance of U.S. policy in bringing, at long last, redress of these grievances. In fact, I am convinced that only resolute leadership by the next U.S. president will avert a terrible new calamity in the Middle East that may engulf the U.S. in war.

I have every confidence that George Bush will provide that leadership. I base my forecast on personal acquaintance covering more than 20 years and this includes private conversations and correspondences on the Arab-Israel dispute, several years ago. It is noteworthy that when I was under heavy attack by Israel's lobby in my ill-fated 1982 campaign, he resisted lobby pressure and spoke in my behalf at a home-district fundraiser.

He knows the Middle East and its cross-currents like the back of his hand. In our nation's most important ambassadorships, as director of the Central Intelligence Agency, and for the past eight years as Vice President, Mr. Bush has witnessed firsthand the frequent and substantial damage Israel's lobby causes to our national interests.

On the Democratic side, Michael Dukakis is a dangerous novice. Given this handicap and the enormous financial support he is accepting from pro-Israel political action committees, he could, as president, be no more than Israel's errand boy.

Don't be confused by last-minute campaign bombast. George Bush knows what must be done in the Middle East, and he has the strength and skill to succeed. You can count on him to assert effectively our own national interest when it diverges from Israel's, and Americans of Arab ancestry owe it to themselves to give him their utmost support.

Your friend,

Paul Findley

15

Bush '88 Quayle

FOR IMMEDIATE RELEASE
October 20, 1988

Contact: Leslie Goodman
(202) 624-8399

BUSH-QUAYLE '88 CAMPAIGN ANNOUNCES ARAB AMERICAN COMMITTEE

WASHINGTON, D.C. -- The Bush-Quayle '88 campaign announced today the formation of Arab Americans for Bush-Quayle '88 Committee, under the honorary chairmanship of former Oregon Governor Victor Atiyeh. Department of Labor Solicitor George R. Salem of Springfield, Virginia, will chair the committee, which is charged with mobilizing support in the Arab American community on behalf of the Vice President.

In accepting the honorary chairmanship of the Committee, Governor Atiyeh called on his fellow Arab American to support the election of George Bush for President. "George Bush is the only candidate who has an intimate knowledge of this nation, its hopes, concerns and vision for the future", said Governor Atiyeh.

Mr. Salem welcomed the formation of the Arab American Committee, stating that "Arab Americans welcome the opportunity to participate in the campaign and look forward to working in the neighborhoods and the precincts on behalf of the Vice President." Mr. Salem went on to note that, "George Bush's record and message of traditional values, God, family, and economic opportunity reflects the concerns and values of the Arab American community."

Also named to the Committee as Vice Chairs were Senator James Abdnor, Administrator of the Small Business Administration, of Washington, D.C.; Spencer Abraham, Chairman of the Michigan Republican Party, of Lansing, Michigan; Michael Baroody, Assistant Secretary for Policy for the U.S. Department of Labor, from Alexandria, Virginia; Mounzer Chaarani, President of Chaarani and Associates, of Santa Ana, California; Mitchell E. Daniels, Jr., President, Hudson Institute and former Assistant to the President for Political and Intergovernmental Affairs, of Indianapolis, Indiana; George Milhim, Mayor of the Village of Hempstead, of Hempstead, New York; Mae Moussa, Former Chairwoman of Republicans Abroad, Lebanon; of Washington, D.C.; Fuad Sahouri, Chairman of the American Arab Business Association, of Great Falls, Virginia; Col. Alfred H.M. Shehab, Chairman of the Board of the National Association of Arab Americans, of Odenton, Maryland; and Dr. Peter Tanous, Former Chairman of the Board of the National Association of Arab Americans, of Bethesda, Maryland.

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RECEIVED

ARAB AMERICAN REPUBLICAN FEDERATION

918 16th Street, N.W., Suite 501, Washington, D.C. 20006

- ☐ **YES!** I declare my support for the Republican campaign and for a strong Arab American Republican organization.
- ☐ Enclosed is my \$3.00 for 1988 dues to help build a strong Arab American Republican Federation.*
- ☐ Renewal Member ☐ New Member

*Subscribing members will receive Election '88 Reports.

7

Arab Americans for George Bush



January 4, 1987

Dear Fellow Arab American,

In 1988 Arab Americans face the important task of electing a leader who will ready this great nation to meet the challenges of tomorrow. Our community will be looking to a candidate with leadership and experience. We need a candidate who brings to the presidency the knowledge and capabilities to make the tough and balanced decisions that will allow us to respond to the needs of this country.

I believe that Vice President George Bush offers these unique qualities and that is why I am asking for your support to help make George Bush the next President of the United States.

I am convinced that a George Bush presidency would be one of leadership, vision and integrity.

The crucial issues that face this country in the years ahead, the issues that Arab Americans are most concerned with, are in the area of foreign policy. George Bush is alone among the candidates in his ability to deal with the complex and difficult international questions that we face. The Vice President's experience and personal involvement are vital assets in our working together to resolve these critical issues.

Governor John Sununu of New Hampshire, an Arab American and a National Co-Chair of the Bush campaign, has pledged to make this a winning campaign and to do everything to achieve that goal. I share with him the goal of electing George Bush and ask you to join with us today in this pledge.

Arab Americans for George Bush will not only be committed to electing our candidate as the next president, but we will work to bring Arab Americans into every level of the campaign process.

Please use the enclosed form to join me in this effort. Sign-up today to work with me to bring Arab Americans in at all levels of the process. Additionally, your contribution of \$1000, \$500, \$250 or \$100 will help bring the message of Arab Americans to the Bush campaign.

We have a great deal of work before us, but I am confident that together we can make a difference.

Sincerely,


Victor Atiyeh
Chairman

9304350230

Arab Americans for George Bush

YES! Governor Atiyeh, I want to join Arab Americans for George Bush. Please make me part of the effort to elect George Bush and bring Arab Americans into the campaign process.

Name _____

Occupation/
Employer _____

Address _____

Phone (day) _____ / _____ (eve) _____ / _____
* * *

I would like to sign-up to:

_____ Work as a volunteer at the George Bush for President campaign office in my city.

_____ Help raise an additional \$500 from family and friends.

_____ Organize an Arab American support network for George Bush in my community.
* * *

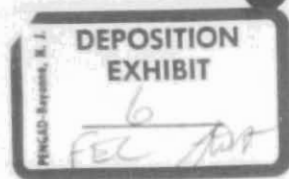
Also, Enclosed is my contribution to the Arab Americans for George Bush effort:*

☐ \$100 ☐ \$250 ☐ \$500 ☐ \$1000 ☐ \$ _____

* Note: Please make checks payable GEORGE BUSH FOR PRESIDENT.

Please return to:

Arab Americans for George Bush
P.O. Box 65153
Washington Square Station
Washington, DC 20035



Arab American Republican Federation



5/24/88

123

Election '88 Report May 1988

Vice President Bush formally sealed the Republican presidential nomination with a victory in Ohio's May 3rd primary, as the state put him over the top in the delegate count. Surveying the latest round of primaries, Arab Americans continue to make impressive gains in the delegate process and are now set to turn their attention towards organizing for the general election

[1] In Ohio, George Bush's sweep of the state's May 3rd primary produced the second Arab American delegate to the 1988 Republican National Convention. **Norman Murdock**, Hamilton County Commissioner and long-time Republican office holder, will be an at-large delegate in the Ohio delegation. Mr. Murdock has indicated interest in representing Ohio on the Platform Committee at the convention.

[2] **Raymond Howar** was elected as a Bush alternate delegate in the District of Columbia's May 3rd primary and will also be headed to New Orleans. Elected from DC Ward #1, Mr. Howar is also an active member of the District's business community.

[3] In Colorado, delegates elected at the April 4th precinct caucuses attended county conventions across the state on April 23rd. **Sherine Hamawy Centenari**, elected as a Bush delegate in Denver County, was selected to move onto the June 4th State Convention. Ms. Centenari also notes that she had the opportunity to meet Neil Bush, the Vice President's brother, at the county convention.

[4] In a late update report from Georgia, **Mary Zumot** was elected as a Bush precinct delegate from DeKalb County's precinct 5, in the 4th congressional district. Ms. Zumot went onto the county convention and from there was elected to attend the state convention in Albany, GA on April 18th.

[5] Also, in addition to our earlier reports on the activities of **Governor John Sununu** of New Hampshire, we neglected to include that the Governor is a Bush delegate and will also be acting as chairman of the New Hampshire delegation to the Republican National Convention in August.

* * * * *

Arab American
Republican
Federation



Election '88 Report #6
April 1988

* * * *

March's Super Tuesday and Illinois primaries, handing Vice president George Bush the Republican nomination, effectively ended active campaigning in the presidential race. Yet the election process continues across the country, with delegates being selected at the precinct caucuses and state primaries that still remain on the calendar. Arab American activity in the 1988 elections pushes forward, particularly at the presidential level, where active planning for the general election has already begun.

[1] Results continue to come in from across the state of Texas where Arab American Republicans have registered impressive gains in the state's caucus system.

* **Houston** - Arab Americans garnered 8 precinct delegate slots in the March 8th caucuses across the Houston area. Many moved on to the March 19th senatorial level conventions and forward still to the state convention, scheduled to take place in Houston on June 9th-11th.

Louis Macey is headed onto the Texas Republican state convention in June as a Bush delegate. Mr. Macey, elected in the 17th senatorial district, precinct 234, has a long record of involvement in Houston politics. A former city council member and presently serving on the Metro Board, the local public transit authority, Mr. Macey notes that his experience with George Bush dates back to 1970 when he worked on Bush's unsuccessful bid for the U.S. Senate.

Samir Jazrawi, also a Bush delegate, has been selected as a alternate to the state convention from senatorial district 7, precinct 504. Mr. Jazrawi was successful in passing a resolution calling for peace in the Middle East.

Victor Maria will also be attending the state Republican convention as an alternate delegate. Both Mr. Maria and his wife, **Norma Maria**, were elected as Bush delegates from precinct 25. Mr. Maria did attempt to introduce a resolution on Palestinian statehood but noted that it was met with strong opposition and some rather contentious behavior on the part of the precinct leadership and other delegates.

Jomana Amara went to both the precinct and senatorial conventions as a Bush delegate. Ms. Amara, elected in senatorial district 17, precinct 4, was also appointed to the resolutions committee, but was unsuccessful in her attempt to introduce resolutions on Palestinian statehood and Lebanon.

Janet Mousa was elected as a Bush delegate from senatorial district 7, precinct 14 and attended both the precinct and senatorial conventions. Though she did not make it to the state convention, Ms. Mousa nonetheless hopes to attend the June state convention as a volunteer.

Assad Shorrosh was also elected as a Bush delegate from senatorial district 7, precinct 648 and attended the March 8th precinct convention.

Zahra Khatib rounds out the field of Arab American Bush delegates. Elected in precinct 350, senatorial district 13, Ms. Khatib attended both the March 8th and 19th conventions.

Though not running as a Bush delegate, Samir Foteh joined with other Arab American businessmen in running advertisements in support of George Bush. The ads, run just before the March 8th primary, were promoted jointly with the Fort Bend County Republican Women's Club.

* Dallas-Ft. Worth - Bill Gunselman was appointed to nominations committee for the 26th congressional district. The committee was charged with selecting delegates to go on to the Republican National Convention in New Orleans. Though not among those selected by the committee, Mr. Gunselman reports that an opportunity to go forward still exists in the at-large delegate process, where he hopes to make it as a national delegate.

George Aldridge and Issa Kamar, both of whom were elected as delegates at the March 8th caucuses in Dallas, made it on to the March 19th senatorial level conventions. Each senatorial convention sent forward 3 delegates to attend the state convention in June. Mr. Aldridge and Mr. Kamar were not selected to go on to the state convention. Joe Chamy, who was also selected to go to the senatorial convention, was unable to attend due to an illness in the family.

[2] In Colorado, Sherine Hamawy Centanari was elected as a Bush delegate at the April 4th precinct caucuses, from 535th precinct in Denver County. Ms. Centanari goes onto the April 23rd county conventions and hopes to make it to the state convention.

[3] Emil Haddad helped give the Bush campaign a boost in Illinois, where Bush handily won the March 15th primary. Mr. Haddad, a committeeman in precinct 29, York Township, worked in getting out the vote on election day and was able to deliver his

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precinct for Bush. Mr. Haddad also had the opportunity to meet the Vice President as he was campaigning through the state.

[4] **George Salem**, representing the Arab American Institute, appeared before the Republican National Committee's **Committee on the Platform** on March 30th, urging the Party to include in its platform a plank calling for Middle East peace based on the formula of Palestinian self-determination, with rights to statehood

Speaking before the Committee, which included Republican National Committee Chairman **Frank J. Fahrenkopf, Jr.**, RNC Co-Chair **Maureen Reagan** and Committee Co-Chair Senator **Bob Kasten**, Mr. Salem cited the "tornado of political violence and unrest" in the Occupied Territories as evidence of the failure of U.S. policy in the region. Noting the brutal tactics used by Israeli soldiers and the resulting deaths and injuries, Mr. Salem stated that these "atrocities should weigh heavily on the conscience of American taxpayers."

In concluding, Mr. Salem urged the Committee to include in the Party's platform a plank supporting Palestinian statehood. A copy of the press release on the hearing is enclosed. A full transcript of Mr. Salem's testimony is available upon request.

The platform process continues with hearings in Kansas City on May 31st, covering domestic and natural resources issues; in Los Angeles on June 30th, covering economic and international trade; and in New Orleans before the national convention in August with the full platform committee meeting. Arab Americans will be meeting with the committee staff in late April to discuss how our community can play a greater role in the process and to insure our concerns receive a hearing before committee.

* In a related note, The Washington Post reported on April 11th that New Hampshire Governor **John Sununu** has been assigned a new job in the Bush campaign by the Vice President. According to the Post's report, Bush aides said the Governor has been designated to oversee platform issues.

[5] Governor **Victor Atiyeh** was in Washington in late March, meeting with Vice President Bush and George Bush for President campaign officials. The campaign, now laying the groundwork for general election, discussed with the Governor the preparation of plans for active Arab American participation in the fall. Governor Atiyeh informed the campaign that efforts to build support for the Vice President in the Arab American community has already succeeded in producing offers of volunteer support in 20 states. The Governor expressed his belief that the Arab American community was willing to play a full role in the Bush campaign and welcomed the organization's efforts to bring Arab Americans into the process.

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[6] In California, the main focus of Arab American Republican political activity centers on the June 7th primary, now little more than a month away, where congressional races and important central committee contests are to be decided.

* **Sam Badawi** has a lock on a Republican Party Central Committee seat in Santa Cruz County. The March filing deadline passed with five candidates, including Mr. Badawi, remaining uncontested, for the central committee in the 5th district.

* In San Mateo County, **Bashir Meer** collected 50 signatures to ensure his presence on the June 7th ballot for a Republican Party central committee seat. Mr. Meer is running in San Mateo's 3rd county district.

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* The Executive Board of the San Jose/South Bay chapter of NAAA met with Republican candidate for California's 12th congressional district seat, **Tom Campbell**, on March 25th. The meeting was arranged by **Sami Ibrahim**, acting as liaison between the Campbell campaign and the chapter. Also attending the meeting were **Abdel El-Shaieb** and **Isam Qubain**. All three gentlemen are members of the Arab American Republican Club of Santa Clara County. Both Campbell and Republican incumbent Rep. **Ernie Konnyu** attended the NAAA chapter's annual banquet on April 9th.

* **Mounzer Chaarani**, Chairman of the Arab American Republican Club of Orange County, reports that the club is keeping a watchful eye on the race for the Republican nomination in the 40th congressional district. The race for the open seat, created by the decision of incumbent Rep. **Robert Badham** not to run for a 7th term, has produced a host of would be contenders. The Orange County club has already met one of the leading candidates, **Nathan Rosenberg**, and hopes to meet with others before the June 7th primary, including another front runner, **Dave Baker**.

An April 15th meeting of the club featured **Costa Mesa City Councilman Peter Buffa**, who only recently withdrew from the congressional race. **Norman Tanber** reports that Mr. Buffa, who is of Italian descent, spoke of his own experiences in meeting with ethnic prejudice and stressed active political participation as a means of overcoming such prejudices.

In another California congressional race, the Orange County club lent its support to Arab American **Luis Acle** at a fundraiser on April 8th. Mr. Chaarani notes that Mr. Acle was able to meet members of the local community and share with them the progress of his campaign. Mr. Chaarani said that he also hoped that club could further aid in Mr. Acle's campaign in the near future.

* In Los Angeles, **Paul Stephen**, President of the **William**

Neima Club, a group of active Arab American Republicans, reports that the club will be holding a May 20th reception for Republican Minority Leader of the California Assembly **Pat Nolan**.

[7] **Mike Sarafa**, running hard for the state legislature in Michigan, picked up two key endorsements in the past weeks. **Colleen Engler**, a former candidate for lieutenant governor and also a former legislator, endorsed Mr. Sarafa after a meeting with the candidate in early April. **California State Senator Waddie Deddah**, a prominent member of the Chaldean community, also lent his support to Mr. Sarafa's effort. The campaign kicks-off with a fundraising event on May 5th.

[8] **Luis Acle's** campaign continues in his race for 44th congressional seat. The campaign got a big boost on April 7th when **Congressman Duncan Hunter** of the 45th district formally endorsed Mr. Acle. Congressman Hunter's endorsement, whose old district covered about 80% of the current 44th, is considered significant in that it brings to the campaign many new supporters and volunteers. The next major event for the campaign comes on April 30th when **Senator Alan Simpson (R-WY)** comes to San Diego for a major fundraising event.

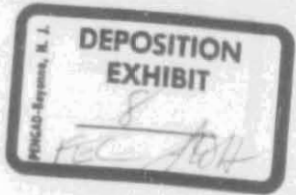
Mr. Acle now faces a June 7th Republican primary challenge from San Diego attorney **Rob Butterfield**. In a district where Democrats outnumber Republicans by almost 2-1, one stark difference between the candidates is in their strategy for appealing to Democratic voters. Mr. Acle believes that his conservative approach will appeal to traditional and fiscal conservative Democrats disaffected with present incumbent **Rep. Bob Bates'** liberal record. Mr. Butterfield's approach is more moderate and liberal on the issues, leading Mr. Acle to feel it difficult for any Republican to out-liberal Bates as a way of attracting Democratic voters.

[9] The Iowa caucuses are but a faint memory but **Tony Nassif** of Cedar Rapids continues his work on behalf of the remaining Republican contender, **Pat Robertson**. Mr. Nassif opted against continuing on in caucus process and instead put in six weeks of work in California, mainly in Los Angeles and Orange County, working as the special events coordinator for the campaign.

[10] The Arab American Republican Federation now has **access to a fax machine**. The machine enables us to send written information over telephone lines, faster, quicker and more reliable than conventional methods. For those with access to a fax machine our number is (202) 429-9214. To take full advantage of this system it also requires us to have knowledge of your fax number. If you have a fax, or access to one, please let us know the number.

The preceding report was compiled by Charles Zogby.

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Arab American Supporters

of

George Bush

cordially invite you to a

GALA RECEPTION

on

Monday, August 15, 1988

six until eight o'clock in the evening

in Galerie 6

Marriott Hotel

555 Canal Street, New Orleans

hosted by the

Arab American Republican Federation

with special thanks to the

National U.S.-Arab Chamber of Commerce

RSVP: Arab American

Republican Federation

202/429-9210

Arab American Republican Federation
918 Sixteenth Street
Suite 501
Washington, D.C. 20006

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BEFORE THE FEDERAL ELECTION COMMISSION

George Bush for President, Inc. and Stan
 Huckaby, as treasurer
 Bush-Quayle '88, Inc. and
 J. Stanley Huckaby, as treasurer
 Greek Americans for Bush and
 William Chirgotis, as chairman
 Arab American Institute, Inc. and James
 Zogby, as Executive Director,
 Arab-American Republican Federation,
 and its treasurer
 William G. Chirgotis

MUR: 2767

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On May 23, 1989, the Commission found reason to believe that the Arab American Republican Federation and its treasurer ("AARF"), violated 2 U.S.C. §§ 433, 434 and 441a(a)(1)(A); that Greek Americans for Bush and its treasurer ("GAB"), violated 2 U.S.C. §§ 433 and 434; and that Bush-Quayle '88, Inc. and J. Stanley Huckaby, as treasurer ("the Presidential Committee"), violated 26 U.S.C. § 9003(b)(2). At the same time, the Commission approved the sending of various discovery requests to these parties, including deposition subpoenas to Charles Zogby, National Secretary of AARF and William Chirgotis, Chairman of GAB. Since that time respondents have submitted responses to the Commission's discovery requests and depositions of William G. Chirgotis and Charles B. Zogby have been taken.

See Attachments I-III.¹ The Commission also declined to pursue

1. The length of the Charles Zogby and William Chirgotis deposition transcripts makes it impractical to attach them in their entirety. Selected portions have been attached where necessary and the full transcripts are available for review in OGC's Docket Room.

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pre-probable cause conciliation in response to a request from the Arab American Republican Federation. At this point the Office of the General Counsel recommends that the Commission find additional reason to believe findings based on information obtained through discovery to date

II. STATUS OF THE CASE

A. Participating Entities

This matter involves a complex factual situation related to a number of individuals and organizations, many of whom are interconnected. Given that fact, it is advisable that the factual background and cast of characters be briefly laid out at the very beginning.

1. Bush-Quayle '88, Inc.

The Bush-Quayle '88, Inc. Committee ("the Presidential Committee") is a common link among all of these individuals and organizations. The Presidential Committee consisted of eight or ten Divisions. See Bush-Quayle '88 7/24/89 Response ("B/Q Response"), Attachment II, pg. 13. This matter focuses on one of those internal campaign divisions, the National Voter Coalitions of Bush-Quayle '88 ("the NVC"). The Director of the NVC was Ceci Cole McInturff; Mark Holman was the Deputy Director. As full-time paid staffers, both McInturff and Holman worked out of the Washington D.C. Presidential Committee Headquarters. Both McInturff and Holman supervised "volunteers" who worked out of the Washington office in pursuit of the Presidential Committee's efforts to involve different coalitions in the Bush-Quayle campaign. Id. at 4.

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As part of the effort, ethnic volunteer leaders and steering committee members were chosen by Bush-Quayle '88 state campaign officials to lead Bush-Quayle campaign efforts at the state level. Id. at 5. In addition to these local organizations, NVC also chose well-known individuals from distinct ethnic or nationality backgrounds to voluntarily mobilize their respective national communities on behalf of the Bush-Quayle Campaign and form organizations within the framework of what was called the Coalition of American Nationalities ("the Coalition"). These individuals were appointed by the Bush-Quayle '88 campaign and accorded the honorary title of chairman of the various ethnic organizations for Bush-Quayle '88. The present matter involves two of the 17 or 18 members of the Coalition of American Nationalities formed by the Presidential Committee in this manner: the Arab Americans for Bush-Quayle '88 ("the Arab Committee") and the Greek Americans for Bush-Quayle '88 ("the Greek Committee"). William G. Chirgotis chaired the Greek Committee. George R. Salem chaired the Arab Committee under the honorary chairmanship of Governor Victor Atiyeh.

Together, the 17 or 18 volunteer ethnic nationality groups actually constituted the Coalition. Id. at Mark Holman Affidavit pg. 1. The Coalition of American Nationalities was advised and kept informed by four "volunteers" working out of the Washington D.C. campaign headquarters of the Presidential Committee. Each of these individuals was given the title "Director, Coalition of American Nationalities." Charles Zogby

Transcript pg. 19. See Chart, Attachment IV.

2. Arab American Republican Federation / Arab American Institute

The Commission has previously found that there is reason to believe that the Arab American Republican Federation and its treasurer, violated 2 U.S.C. §§ 433, 434 and 441a(a)(1)(A). As a result of discovery, the Office of the General Counsel has found information linking AARF with the Arab American Institute "AAI"). AARF and AAI have the same address, the same phone number, share the same office, and have at least one overlapping worker. The one common worker between both organizations is Charles Zogby, who began working as a Republican liaison for AAI in April, 1985, and became the National Secretary for AARF in 1986, while he was still working and being paid full-time by AAI. In fact, Charles Zogby has admitted splitting his work indiscriminately between both organizations in the same office. Charles Zogby Transcript pg. 116.

Apparently AAI and AARF have virtually indistinguishable goals: to encourage Arab Americans to become politically active. AAI provides information on Arab-American elected officials and assists the Arab-American Republican Federation and Arab-American Democratic Federation ("AADF"). Encyclopedia of Associations 1556 (24th ed. 1990).² AARF was founded in 1984 to serve as a liaison to the Republican National Committee on

2. AADF is apparently the counterpart of AARF, only AADF pursues the goal of Arab American political involvement in the Democratic party. Depending upon the results of this investigation we may make further recommendations regarding AADF.

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behalf of Arab-American Republican clubs in an effort to insure recognition of Arab-American concerns on the national level. AARF furthermore provides a network through which Arab-American public office holders may formulate strategies to advance Arab-American concerns. Id. at 1740.

There also are certain differences between these organizations. First, AAI is an incorporated entity and AARF is not. Second, the organizations are structurally distinct: AAI has a staff of 11 and is a nonmembership organization, while AARF is limited to a staff of one and has 575 members distributed throughout 11 local groups. Furthermore, AARF is chaired by Nader Sayegh, and the Executive Director of AAI is Dr. James Zogby. Encyclopedia of Associations 1556 and 1740 (24th ed. 1990). Finally, according to the Encyclopedia of Associations, each organization supposedly meets annually, yet Charles Zogby testified that AARF has held no meetings since 1987. Charles Zogby transcript, pg. 120.

In sum, the ultimate goal of both AAI and AARF is to increase Arab-American political input; with AARF concentrating on Republican Arab-Americans. Given the facts above, it would appear that AAI and AARF are inextricably connected. AARF seems to be the political arm of AAI and may have functioned as the corporation's separate segregated fund.

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3. Greek Americans for Bush and William Chirgotis, as Chairman

The Presidential Committee appointed 79 year-old William G. Chirgotis as the Chairman of the Greek Americans for Bush-Quayle '88 Committee. During his deposition Chirgotis also referred to this group as the Greek Nationalities Group of the Coalition of American Nationalities. Once the Presidential Committee had named Chirgotis as chairman he proceeded to organize the Greek community in support of the Bush-Quayle candidacy. For example, Chirgotis sent out solicitations and used the funds received to place advertisements in Greek oriented newspapers. As set forth in greater detail below, it appears that Chirgotis relied heavily upon Charles Zogby for advice in organizing the Greek community behind Bush-Quayle.

4. Charles Zogby

The central person involved with the individuals and groups discussed above is Charles Zogby. Charles Zogby had connections with the political campaigns of George Bush beginning in 1984 when he worked as a volunteer for the Reagan-Bush '84 ethnic voters division an average of 40 hours a week from August, 1984, until November, 1984. Charles Zogby's contact with the 1988 Presidential Committee dates at least to late 1987. During the 1988 campaign he was a non-salaried worker for the Presidential Committee and was given the title, "Director, Coalition of American Nationalities." He was apparently the Greek and the Arab Committees' contact person at the Presidential Committee. During this same period, Charles Zogby was also a full-time paid

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employee for the Arab American Institute, the National Secretary of AARF, and concurrently attended law school at night.

B. Information obtained through discovery

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The original findings against AARF were based on complainant's submission of a solicitation mailing dated October 19, 1988, which advocated the election of George Bush for President. This mailing, which cost \$537.52, contained no disclaimer of any type. The mailing's cover-letter was signed by Charles Zogby, whom the complainant alleged upon information and belief was Coalition Director for Ethnics of the Presidential Committee.³ The complaint further alleged that Charles Zogby had been receiving either compensation or reimbursement from the Presidential Committee. Based on those facts, complainant alleged that AARF's expenditures were not independent, but instead coordinated with the Presidential Committee. Thus it was alleged that the Presidential Committee had violated 26 U.S.C. § 9003(b) by accepting an in-kind contribution from AARF after certifying to the Commission that it would not accept any contributions in exchange for receiving public funds. Furthermore, the complaint enclosed a New York Times article stating that the October 19th mailing had been sent to about 1,000 people. In light of the above allegations

3. Although Mr. Sayegh prepared the October 1988 mailing, Charles Zogby read the mailing and signed the accompanying letter. Charles Zogby also prepared the membership card that was included in the mailing. The stated rational for having Zogby sign the letter was that the recipients were more familiar with Charles Zogby, as National Secretary, than they were AARF's Chairman, Mr. Sayegh. Charles Zogby Transcript at 87.

and the responses thereto, the Commission found that there was reason to believe that AARF violated 2 U.S.C. §§ 433, 434 and 441a(a)(1)(A)

Information obtained through discovery shows that AARF had previously engaged in fundraising activities on behalf of George Bush for President, Inc. and Stan Huckaby, as treasurer ("the Primary Committee"). On January 4, 1988, AARF spent \$1,988.26 to produce and distribute a solicitation letter advocating the election of George Bush. This letter was signed by Victor Atiyeh, former Governor of Oregon. Charles Zogby Transcript pg. 125; See also Attachment I, pg. 29 & 30. The mailing was sent on letterhead entitled "Arab Americans for George Bush" and denoted a Washington, D.C. P.O. Box for the return of contributions ranging from \$100 to \$1,000, or more, made payable to "GEORGE BUSH FOR PRESIDENT." Charles Zogby testified that the mailing, which displays no disclaimer, was mailed to Republicans on an AAI mailing list that can differentiate between Republicans and Democrats. Charles Zogby Transcript at 142.⁴

In order to fund the preparation and distribution of the January solicitation, Governor Atiyeh sent out a preliminary mailing to Arab American Republicans asking for financial support. These solicitations were followed by phone calls from Charles Zogby. Eventually more than adequate financial support

4. In August 1988 AARF also spent \$1,293.75 to purchase "Ethnic Voters for Bush" campaign buttons for the Republican National Convention.

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enabling distribution of the January letter was collected and deposited into the AARF bank account. Id. at 149.

According to Charles Zogby's testimony, in December of 1987 he created the solicitation page of the January 4, 1988 mailing and edited the coverletter at the AAI/AARF office while he was employed by AAI, and an officer of AARF. Charles Zogby further testified that his past experience with campaign solicitations led him to prepare the solicitation page so as to reflect the name, address, and occupation of the contributor. Id. at 136-137. Testimony indicates that in actuality there was no organization called Arab Americans for George Bush ("AAGB"), but rather that Charles Zogby created that name for this particular mailing and the post office box was set up for the sole purpose of receiving the contributions in response to this solicitation. Charles Zogby indicates that he periodically sent the checks he received from the January solicitation to Fred Bush of the Primary Committee. Although Charles Zogby's deposition reflects some uncertainty, he believes that the funds forwarded to the Primary Committee were somewhat less than \$10,000. Id. at 128.

Sometime after the January mailing, in the early part of 1988, Charles Zogby was called into the Primary Committee headquarters and told that he should not have sent out the January solicitation. Id. at 145. Despite Charles Zogby's deposition testimony that AAGB was not a part of AARF and his belief that he distributed this solicitation in his individual capacity, the Primary Committee reimbursed AARF \$1,988.26 on March 24, 1988, for printing and postage related to this

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mailing. Apparently, neither the excess funds received for the preparation and mailing of the solicitation letter, nor the funds refunded AARF by GBFP were ever refunded to the original contributors. Instead, this money was left in the AARF account. Id. at 150.

Subsequently, in May, 1988, Charles Zogby was invited to attend a meeting to discuss how the ethnic voters program from the 1984 election had been organized and what kind of activities that program had pursued. Also in attendance at that meeting were the following individuals: Mark Holman, the Deputy Director of the Presidential Committee's Bush-Quayle '88 National Voter Coalition; Mark Valenti, of the Republican National Committee; and George Salem, former director of the Reagan/Bush '84 campaign ethnic voters section and then AAI board member, as well as, future Chairman of the 1988 Arab Committee. Id. at 13-15. Other discovery materials indicate that George Salem had previously attempted to advance Arab-American concerns on behalf of AAI by serving as AAI's liaison to the Republican National Committee.⁵

Immediately after the May meeting Charles Zogby contacted Mark Holman to offer his services for the 1988 Presidential Committee's campaign effort. Id. at 15. In the early part of

5. According to an "Election Report" produced by AARF for its members, George Salem, "representing the Arab American Institute, appeared before the Republican National Committee's Committee on the Platform on March 30, 1988, urging the Party to include in its platform a plank calling for Middle East peace based on the formula of Palestinian self-determination." See Charles Zogby Transcript, Exhibit 7, pg. 2.

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July, 1988, Charles Zogby began working for the Presidential Committee. Id. at 18. At that time Charles Zogby began to attend a series of weekly/biweekly meetings at the Presidential Committee's national headquarters to plan the Coalition of American Nationalities' strategy. Those meetings were attended by Mark Holman, Mark Valenti, Myron Wyslyk, Andrew Falkewicz and Ava Natarowicz. Mr. Wyslyk, Mr. Falkewicz, Ms. Natarowicz, and Mr. Zogby were each given the title "Director, Coalition of American Nationalities." Id. at 19. Zogby testified that the discussions at such meetings, among other things, focused on what type of programs the Coalition would pursue, the idea of sending direct letters, and the content of outgoing Coalition newsletters on the candidate's ethnic oriented activities and viewpoints. Mr. Zogby's testimony is at odds with the affidavit of Ms. McInturff, submitted as a part of the Bush-Quayle '88 response, which states that she only had brief conversations with Mr. Zogby and that she is unaware of any meetings in which Mr. Zogby participated. That same response goes on to state that Charles Zogby did not attend any staff meetings of the NVC. B/Q Response at 9.

One of Charles Zogby's responsibilities at the Presidential Committee was to be in charge of assembling the Coalition's weekly newsletter and sending it to the various directors of the local volunteer ethnic organization. At first this newsletter went out to around 400 people, but its weekly circulation eventually reached approximately 1,000. At the same time Charles Zogby was producing the Coalition's weekly newsletters,

he was preparing and distributing monthly Arab American Republican Federation Election '88 Reports. These reports contained information of interest to Arab American Republicans on the 1988 Republican election process. Charles Zogby Transcript pg. 162

Charles Zogby also appears to have served as the "contact" person for at least one other group; the Greek Americans for Bush-Quayle '88 Committee and its Chairman Mr. Chirgotis. Chirgotis testified that his primary contact with the Presidential Committee was Charles Zogby. Chirgotis Transcript at 15. In his position as chairman of Greek Americans for Bush-Quayle '88, Mr. Chirgotis requested Coalition money in order to place advocacy advertisements in Greek publications. According to Chirgotis testimony, as the primary GAB contact at the Presidential Committee, Charles Zogby, most likely told Chirgotis that the Presidential Committee had no funds to place advertisements in Greek publications, but if Chirgotis wanted to raise funds for such ads he could do that. Id. at pp. 38-40. Zogby denies telling anyone that they could raise funds. Charles Zogby Transcript pg. 73.

On October 12, 1988, in his position as Director, Coalition of American Nationalities, Charles Zogby sent some letterhead to William Chirgotis. See Chirgotis Deposition, FEC Exhibit 2 at Attachment V, pg. 1. This letterhead displayed the heading "Bush Quayle 88 Coalition of American Nationalities" and listed William Chirgotis as the Chairman, as well as several other prominent Greek Americans as "Honorary Chairs," "Co-Chairs," and

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a "Vice Chair." See Attachment V at pg 2. Finally, the letterhead Charles Zogby sent contained a disclaimer along the bottom of the paper stating, "Paid for by Bush-Quayle 88." Chirgotis used this letterhead in a solicitation letter sent to approximately 70 or 80 individuals whose names he accumulated through friends and by word of mouth. Chirgotis Deposition at 19. Information utilized by Chirgotis in this solicitation came from materials sent out by the NVC. Id. at 22.⁶

The initial costs associated with the preparation and distribution of this Greek Americans for Bush solicitation amounted to \$985, which was paid by Chirgotis himself. In addition, Chirgotis opened an account with \$1,000 of his own money in which to place future receipts. Id. at 29. In response to the solicitation Chirgotis received \$5,425 in additional contributions that were deposited into the account. These funds were then used to prepare and place advertisements in five Greek oriented publications. Attachment VI. In most instances those advertisements carried the disclaimer, "Paid for by Greek Americans for Bush-Quayle," but in one instance the disclaimer states the following: "Paid for by Bush for

6. While Charles Zogby and the Presidential discovery responses indicate that the letterhead used in the original Greek Americans for Bush solicitation would only have been sent if ordered, Chirgotis states that he did not request this letterhead. Charles Zogby transcript at 50 and Chirgotis transcript at 25. The coalitions, according to the campaign, were comprised solely of volunteers, selected by state campaign officials and were different from the coalition leaders involved in the National Voter Coalition who were paid employees. B/Q Response citing McInturff Affidavit pg. 4-5. Thus, according to the campaign, this letterhead was intended to encourage others to volunteer for the campaign.

President Committee." See Attachment VI, pg. 8.

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The Presidential Committee maintains that its Coalition volunteers were encouraged to participate in activities such as writing Op-Ed pieces and Letters-To-The-Editor of local media, but not to fundraise. B/Q Response citing McInturff Affidavit, pg. 5. According to the affidavit of Mark Holman, the Deputy Director of the NVC, the NVC was allotted a budget of \$10,000 to place advertisements in ethnic newspapers, but none were placed in Greek publications. Id. at Mark Holman Affidavit, pg. 2. In addition, the Presidential Committee acknowledges that it issued two press releases regarding the formation of Greek Americans for Bush-Quayle '88. The Presidential Committee asserts, however, that this organization had nothing to do with Greek Americans for George Bush which was simultaneously organized by the Presidential Committee's own appointed Chairman of the Greek Americans for Bush-Quayle '88. Id. at 2.⁷

The Presidential Committee also sent a memorandum dated October 12, 1988, to all National and State Coalition leaders. That memo from Ceci Cole McInturff, Director for NVC, states that all fundraising efforts undertaken by coalition members should be done in their individual capacities and not on behalf of the Presidential Committee. The memo states that any legal

7. Throughout his deposition Chirgotis does not make any apparent distinction between Greek Americans for George Bush and Greek Americans for Bush-Quayle '88. In fact, Chirgotis testified that he considered Greek Americans for Bush to be connected to the Presidential Committee. Chirgotis Transcript at pg. 66. As discussed herein, both names are alluded to in the same correspondence from Chirgotis.

questions should be directed toward the Presidential Committee's General Counsel at a phone number given in the memo.

Attachment VII: Memorandum sent by McInturff to Coalition Leaders pg. 1-2. Chirgotis' recollection regarding receipt of this "do's and don'ts" memo is unclear. He testified that he could have received something similar to it, but maintains he never received anything that said he could not fundraise Chirgotis Transcript at 43. In fact, Chirgotis emphatically testified that he was never told fundraising was forbidden and that he "went under the assumption that we were authorized to proceed to raise money to pay for the ads, and we went along with that assumption." Id. at 43. Chirgotis further testified that he felt the receipt of Bush-Quayle '88 disclaimer letterhead "authorized" him to raise funds. Id. at 37-38. Mr. Chirgotis does not remember receiving anything that said his activities were not authorized by the campaign until he got notice of the complaint filed by complainants. Id. at 60.

III. ANALYSIS

A. Coordination

A major issue raised in this matter centers on whether expenditures made by AAI, AARF, and GAB to benefit the Primary and Presidential Committees qualify as independent expenditures under the Federal Election Campaign Act of 1971, as amended ("the Act"), and implementing Commission Regulations. If an expenditure does not qualify under the Commission's regulations as an independent expenditure, it is treated as an in-kind contribution to the candidate or candidate's authorized

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committee on whose behalf it is made. 11 C.F.R. § 109.1(c). Under the Presidential Election Campaign Fund Act ("the Fund Act"), organizations may make independent expenditures on behalf of a presidential candidate receiving public financing. 26 U.S.C. § 9001 et seq. However, candidates receiving public funds under the Fund Act cannot accept any outside contributions. 26 U.S.C. § 9003(b)(2).

Section 431(17) of the Act defines "independent expenditure" as

[A]n 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 of, any candidate, or any authorized committee or agent of such candidate.

Commission implementing regulations at Part 109 establish guidelines for determining whether an expenditure falls within this statutory definition. Section 109.1(b)(4)(i) clarifies the terms "cooperation" and "in consultation with" by defining them to mean "any arrangement, coordination, or direction by the candidate or his or her agent prior to the publication, distribution, display or broadcast of the communication." The regulation further states that an expenditure is presumed to be coordinated when it is:

(A) Based on information about the candidate's 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; [or it is]

(B) Made by or through any person who is, or

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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.

11 C.F.R. § 109.1(b)(4)(i)(A) & (B). Central to the inquiry of whether these presumptions of coordination apply is the issue of whether Charles Zogby was an agent of the Primary or Presidential Committees. Commission regulations define an agent as follows:

[A]ny person who has actual oral or written authority, either express or implied, to make or to authorize the making of expenditures on behalf of a candidate, or means any person who has been placed in a position within the campaign organization where it would reasonably appear that in the ordinary course of campaign-related activities he or she may authorize expenditures. 11 C.F.R. § 109.1(b)(5) (emphasis added).

The information disclosed through discovery reveals that Charles Zogby was an agent of the Presidential Committee and in that capacity coordinated the expenditures of AAI, AARF and GAB to the benefit of the Presidential Committee. First, Charles Zogby had all of the trappings of authority: he held the title of Director, Coalition of American Nationalities; used official Bush-Quayle business cards; had his own desk at the National Bush-Quayle '88 headquarters; and was listed in the campaign telephone directory.

Moreover, during his 35+ hour work week for the Presidential Committee, Zogby contacted individuals to see if they would become members of the newly formed ethnic coalitions.

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During the course of such conversations Zogby would state his name, identify that he was from the Bush campaign and that he served on the Presidential Committee's Coalition of American Nationalities. Charles Zogby also became one of the primary contacts with individuals volunteering for the ethnic coalition groups. He gave advice on how to mobilize the different ethnic organizations and ordered ethnic/nationality stationary which he sent out to at least one of the ethnic organizations. Charles Zogby Transcript at 31 & 45.

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Charles Zogby's position within the campaign organization made it reasonable to assume that he had either express or implied authorization to make expenditures. William Chirgotis' testimony confirms that Charles Zogby in fact was perceived as a Presidential Committee campaign official. Certainly William Chirgotis felt that Charles Zogby had authority to make expenditures for advertisements in Greek publications because Chirgotis asked Charles Zogby to do just that. In short, the evidence on hand clearly establishes that Zogby was placed in a position within the campaign organization where it would reasonably appear that he could authorize expenditures, which is all that is required to establish agency under the Commission's Regulation. See 11 C.F.R. § 109.1(b)(5).

As noted earlier, coordination may be presumed where expenditures are made based on information about the candidate's plans, projects, or needs provided by an agent of the candidate's committee. See 11 C.F.R. § 109.1(b)(4)(i)(A). In this matter, Charles Zogby's presence and apparent involvement

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in the campaign organization and on-going operation of the Coalition set up by the NVC indicates that he had access to the candidate's plans, projects, and needs in relation to the Presidential Committee's ethnic outreach. As discussed infra, 9-12, Charles Zogby attended weekly strategy meetings and frequently consulted with Mark Holman, the paid campaign Deputy Director of the Coalitions Division. Charles Zogby also had contact with Ceci McInturff, the director of the NVC, and Leslie Goodman, the NVC press relations director. In addition, as part of his responsibilities, Zogby put together information for at least one press announcement and helped publish a weekly campaign newsletter. Thus, Charles Zogby was in direct contact with all levels of the campaign hierarchy and had access to information regarding the campaign's plans and goals. Cf. MUR 2277 (no direct contact with political committee was an important factor in finding no coordination). Accordingly, under Commission regulations the expenditures made by AAI, AARF and GAB were not independent and should be treated as in-kind contributions.⁸

Moreover, the evidence adduced during discovery suggests that Charles Zogby may have utilized his knowledge of the Presidential Committee's ethnic outreach efforts in connection with the AAI, AARF and GAB expenditures. First, Charles Zogby

8. Charles Zogby's asserted independence is further overcome by his acknowledged receipt of a \$150 reimbursement from the Presidential Committee. Under 11 C.F.R. § 109.1(b)(4)(i)(B) coordination may be presumed by showing that expenditures were made through any person who has received any form of reimbursement from the candidate's committee.

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sent Chirgotis the letterhead for the GAB solicitation only one week prior to the October 19th AARF solicitation, in which Charles Zogby also played a crucial role. Second, the GAB financed newspaper advertisements appeared at a time when NVC Presidential Committee funds were placing advertisements in other ethnic newspapers. Third, Charles Zogby composed and distributed AARF financed monthly Election Reports containing information about Arab American Republican activities, at the same time he worked on the Coalition's weekly newsletter.⁹ In sum, Charles Zogby's assertion (Charles Zogby Transcript pg. 85) that the October 19, 1988 AARF mailing was neither authorized by, nor coordinated with the Presidential Committee is inconsistent with the preponderance of other available evidence. Consequently, rather than being independent expenditures, it appears that the expenditures discussed above constituted coordinated in-kind contributions.

B. Results of Coordination

In light of the fact that the expenditures made by AAI/AARF and GAB appear to be in-kind contributions, new issues and potential violations arise ranging from excessive and corporate contributions to receipt of contributions by a publicly financed campaign.

9. Through additional discovery this Office will seek production of the Presidential Committee's ethnic newspaper advertisements and copies of the Coalition's weekly newsletter so that they may be compared to the GAB advertisements and AARF election reports.

1. Corporate Contributions

The Act specifies that corporations are prohibited from making federal election contributions out of corporate treasury funds. 2 U.S.C. § 441b(a). A contribution or expenditure is defined to include "any direct or indirect payment, distribution, loan, advance, deposit or gift of money or any services, or anything of value... to any candidate, campaign committee... in connection with" any federal election.

2 U.S.C. § 441b(b)(2). It is also unlawful for any officer or director to consent to a corporate contribution or expenditure in connection with a federal campaign. 2 U.S.C. §§ 441b(a). Further, a corporation may not serve as a conduit or intermediary to facilitate the making of contributions, such as by providing envelopes addressed to the candidate or committee. See AOs 1987-29, 1986-4, and 1982-2.

However, there are certain exemptions from Section 441b's broad prohibitions. Section 441b(b)(2)(A), for example, exempts a corporation's internal communications with members of its restricted class from the definition of contribution or expenditure.¹⁰ In addition, 11 C.F.R. § 114.9(a) enables employees or shareholders to make occasional, isolated or incidental use of corporate facilities for "individual volunteer activity," provided certain requirements are met. First, the

10. For purposes of Section 441b, the term "executive or administrative personnel" means individuals employed by a corporation who are paid on a salary basis, and who have policymaking, managerial, professional or supervisory responsibilities. 2 U.S.C. § 441b(b)(7), 11 C.F.R. § 114.1(c).

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use of corporate facilities must be by stockholders or employees of the corporation. Second, the use must be occasional, isolated or incidental. Third, the activity must be on a volunteer basis. In addition to these three requirements, the stockholder or employee using the corporate facilities is required to reimburse the corporation to the extent that the overhead or operating costs of the corporation are increased. See also 11 C.F.R. § 114.9(c) (allowing any person to use the facilities of a corporation to produce materials in connection with a Federal election, provided that person reimburses the corporation within a commercially reasonable time for the normal and usual charge for producing the materials in the commercial market).

It appears that AARF/AAI violated the statutory prohibition against corporate contributions on several grounds. For example, Charles Zogby was paid a salary by AAI during the time period in which he was working over 35 hours a week with the Presidential Committee. In addition, Charles Zogby used AARF/AAI resources to produce both the January solicitation letter and the October mailing. In both instances AAI/AARF facilities, computers, and mailing lists were essential to the ultimate mailing. These activities were coordinated through an agent of the campaign, and therefore must be treated as in-kind contributions. Given the utilization of corporate resources in their production, it appears that they constitute prohibited

corporate contributions.¹¹

Moreover, these expenditures do not appear to fall within any of the exemptions to the Section 441b prohibition. Given that the Primary Committee reimbursed AARF for the costs associated with the January solicitation letter advocating George Bush for President and did not reimburse Charles Zogby, those expenditures cannot be viewed under 11 C.F.R. § 114.9 as connected to the occasional, isolated, or incidental use of corporate facilities by employee Charles Zogby. Charles Zogby, as the person using the AARF/AAI resources to produce the letters, would have been the individual required to reimburse AARF/AAI for the associated costs if the exception of Section 114.9 were to apply. See the General Counsel's Brief in MUR 2185 ("Goldome FSB"). It is also questionable whether the time required to draft the January solicitation letter, distribute it to the AAI list, and transfer the contributions to the Primary Committee would enable these activities to be classified as "occasional, isolated or incidental." It is certainly doubtful that Charles Zogby was later able to carry out his AAI employee duties, as required under the statutory definition of incidental at 11 C.F.R. § 114.9(a)(i), while working greater than 35 hours in October, 1988, for the Presidential Committee and attending law school

In light of the foregoing, the Office of the General

11. It is also noted that the Arab American Republican Federation spent \$1,293.75 for "Ethnic Voters for Bush" campaign buttons for the Republican National Convention.

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Counsel recommends that the Commission find reason to believe that the Arab American Institute Inc. violated 2 U.S.C. § 441b. This Office also recommends the Commission find reason to believe that the Arab American Republican Federation violated 2 U.S.C. § 441b.

2. Excessive Contributions

The Act at Section 441a prohibits any person from making contributions to a given candidate in connection with a particular election, which in aggregate, exceed \$1,000 2 U.S.C. § 441a(a)(1)(A). The facts here indicate that the Presidential Committee, via its agent, coordinated the expenditures of GAB with other campaign efforts directed toward ethnic groups, and thus GAB's expenditures on advertisements in the Greek oriented media constitute in-kind contributions under 11 C.F.R. §§ 109.1(b)(4)(i) and 109.1(c). As demonstrated above, it appears that Charles Zogby was an agent of the Presidential Committee under Commission regulations. William Chirgotis has testified that it was likely Charles Zogby who told Mr. Chirgotis that the Presidential Committee had no funds to place advertisements in Greek publications, but that Chirgotis should feel free to raise funds to place such ads. Shortly thereafter Charles Zogby sent Presidential Committee stationery to Mr. Chirgotis, which he used to raise \$5,425 for the placement of pro-Bush/Quayle advertisements in Greek publications. Thus, the Office of the General Counsel recommends that the Commission find reason to believe that Greek Americans for Bush violated 2 U.S.C. § 441a(a)(1)(A) by

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expending greater than \$1,000 on advertisements advocating the election of George Bush. Also, this Office recommends that the Commission find reason to believe that William G. Chirgotis violated 2 U.S.C. § 441a(a)(1)(A) by contributing more than \$1,000 to GAB to facilitate the production and placement of GAB's advertisements. See infra pg. 13.

3. Liability of Presidential Committees

Under the Act it is unlawful for any federal candidate or political committee to knowingly accept or receive any contribution from a corporation. 2 U.S.C. § 441b(a). Additionally, no federal candidate or political committee may knowingly accept any contribution in excess of the limitations provided in Section 441a. 2 U.S.C. § 441a(f).

With regard to the January solicitation, the Office of the General Counsel recommends that the Commission find that there is also reason to believe George Bush for President, Inc. and Stan Huckaby, as treasurer, violated 2 U.S.C. § 441b by accepting a corporate contribution. Although AARF was reimbursed for the January mailing as noted in the amended March report, such reimbursement only serves as a mitigating factor, and does not excuse the violation.

The Commission previously found that the Presidential Committee violated 26 U.S.C. § 9003(b)(2) by accepting in-kind contributions. While the Presidential Committee may attempt to disclaim responsibility for Charles Zogby's actions, any attempt to do so must fail given the Primary Committee's involvement in the January, 1988 AARF solicitation letter. In AO 1984-30

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the Commission addressed the question whether acknowledged coordination during the primary election could serve to jeopardize the committee's ability to make independent expenditures on behalf of the same candidate in the subsequent general election. The Commission concluded that the "prior arrangement" in the primary election campaign would, in fact, jeopardize independence in the general election campaign. Therefore, the acknowledged reimbursement to AARF by the Primary Committee for the January letter in the present matter, as well as the Committee's reliance on Charles Zogby preclude the Presidential Committee from arguing complete independence from AAI/AARF.

The Presidential Committee must have some accountability for individuals it places in positions where the public will perceive them as representing the Committee. Such accountability is all the more justifiable when the individual in question has shown a prior propensity to overreach his authority, as was the case with Charles Zogby. The Presidential Committee knew, or should have known, of Charles Zogby's past forays into unauthorized fundraising as a result of his January advocacy/solicitation letter for the Primary Committee. Accordingly, the Presidential Committee is responsible for the acts of Charles Zogby.

B. Other Violations

Section 441d of the Act mandates that all express political advocacy communications, or general public political advertising, must carry certain disclaimers. These disclaimers

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are required to state as follows

(1) if paid for and authorized by a candidate, an authorized political committee of a candidate, or its agents, shall clearly state that the communication has been paid for by such authorized political committee, or

(2) if paid for by other persons but authorized by a candidate, an authorized political committee of a candidate, or its agents, shall clearly state that the communication is paid for by such other persons and authorized by such authorized political committee;

(3) if not authorized by a candidate, an authorized political committee of a candidate, or its agents, shall clearly state the name of the person who paid for the communication and state that the communication is not authorized by any candidate or candidate's committee.

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The October 1988 AARF mailing was sent out on a combination of Arab American Republican Federation letterhead, Bush-Quayle '88 letterhead, as well as stationary denoted as coming from the Arab American Supporters for George Bush. None of the pages comprising this October 1988 mailing displays a disclaimer. Likewise, AARF's January 1988 mailing was sent out on letterhead entitled Arab-Americans for George Bush, an apparently fictitious organization. These mailings, which expressly advocated the election of George Bush, failed to include an appropriate disclaimer. Thus, this Office recommends that the Commission find that there is reason to believe that AARF and AAI violated 2 U.S.C. § 441d(a)(3)

William Chirgotis also failed to place the appropriate

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disclaimer on his original solicitation correspondence for GAB on the Bush-Quayle '88 Coalition of American Nationalities stationary sent to him by Charles Zogby. Because Chirgotis actually paid the original printing and distribution costs for this correspondence, but failed to state so, this Office recommends that the Commission find reason to believe that William G. Chirgotis also violated 2 U.S.C. 441d(a)(3).

The advertisements placed by Greek Americans for Bush also failed to meet the disclaimer requirements of 2 U.S.C. § 441d(a)(3) in that they fail to denote whether or not they were authorized by the candidate, while one indicates that it was paid for by the Presidential Committee. Therefore, this Office recommends that the Commission find reason to believe that the Greek Americans for Bush and its treasurer, violated 2 U.S.C. § 441d(a)(3).

Finally, a political committee must disclose in its financial reports all disbursements in their corresponding categories. 2 U.S.C. § 434(b)(4). The Primary Committee reported the March 24, 1988 disbursement to AARF as "event expenses," instead of as an in-kind contribution refund. Therefore, the Office of the General Counsel recommends that the Commission find that there is reason to believe that George Bush for President, Inc. and Stan Huckaby, as treasurer, violated 2 U.S.C. § 434(b)(4)

IV. RECOMMENDATIONS

1. Find reason to believe that the Arab American Institute, Inc. violated 2 U.S.C. §§ 441b(a) and 441d(a).
2. Find reason to believe that the Arab American Republican

Federation violated 2 U.S.C. §§ 441b(a) and 441d(a).

3. Find reason to believe that the Greek Americans for Bush and its treasurer, violated 2 U.S.C. §§ 441a(a)(1)(A) and 441d(a).

4. Find reason to believe that William G. Chirgotis violated 2 U.S.C. §§ 441a(a)(1)(A) and 441d(a).

5. Find reason to believe that the George Bush for President Inc. and Stan Huckaby, as treasurer, violated 2 U.S.C. §§ 434(b)(4) and 441b(a).

6. Approve the appropriate letters and Factual and Legal Analyses.

Date

9/10/90

Lawrence M. Noble
General Counsel

Lawrence M. Noble (292)

Attachments

- I. June 28, 1989 Arab-American Republican Federation Response.
- II. July 24, 1989 Bush-Quayle 88, Inc. Response.
- III. July 27, 1989 William Chirgotis Response.
- IV. Chart of Parties involved in this matter.
- V. Greek Americans for Bush Solicitation.
- VI. Greek Publication Advertisements.
- VII. McInturff Memo to Coalition leaders.
- VIII. Factual and Legal Analyses (4)

Staff Assigned: J. Albert Brown; Nicole Corn

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Red*
DATE: September 10, 1990
SUBJECT: MUR 2767 - General Counsel's Rpt.

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote
Sensitive
Non-Sensitive

XX
XX

24 Hour No Objection
Sensitive
Non-Sensitive

Information
Sensitive
Non-Sensitive

Other

DISTRIBUTION

Compliance ☒

Audit Matters

Litigation

Closed MUR Letters ☐

Status Sheets ☐

Advisory Opinions ☐

Other (see distribution
below) ☐

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/ DONNA ROACH *DL*
COMMISSION SECRETARY

DATE: SEPTEMBER 14, 1990

SUBJECT: MUR 2767 - GENERAL COUNSEL'S REPORT
DATED SEPTEMBER 10, 1990

The above-captioned document was circulated to the
Commission on Monday, September 10, 1990 4:00.

Objection(s) have been received from the Commissioner(s)
as indicated by the name(s) checked below:

Commissioner Aikens	<input type="checkbox"/>
Commissioner Elliott	<input type="checkbox"/>
Commissioner Josefiak	<input checked="" type="checkbox"/> XXXX
Commissioner McDonald	<input type="checkbox"/>
Commissioner McGarry	<input type="checkbox"/>
Commissioner Thomas	<input type="checkbox"/>

This matter will be placed on the meeting agenda
for Tuesday, September 25, 1990.

Please notify us who will represent your Division before the
Commission on this matter.

93043501269



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS /DELORES HARRIS *RH*
COMMISSION SECRETARY

DATE: SEPTEMBER 20, 1990

SUBJECT: MUR 2767 - GENERAL COUNSEL'S REPORT
DATED SEPTEMBER 10, 1990

The above-captioned document was circulated to the
Commission on Monday, September 10, 1990 at 4:00 p.m.

Objection(s) have been received from the Commissioner(s)
as indicated by the name(s) checked below:

Commissioner Aikens	<u>XXX</u>
Commissioner Elliott	<u></u>
Commissioner Josefiak	<u>XXX</u>
Commissioner McDonald	<u></u>
Commissioner McGarry	<u></u>
Commissioner Thomas	<u></u>

This matter will be placed on the meeting agenda
for TUESDAY, SEPTEMBER 25, 1990.

Please notify us who will represent your Division before the
Commission on this matter.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

George Bush for President, Inc. and)
Stan Huckaby, as treasurer;) MUR 2767
Bush-Quayle '88, Inc. and J. Stanley)
Huckaby, as treasurer;)
Greek Americans for Bush and William)
Chirgotis, as chairman;)
Arab American Institute, Inc. and James)
Zogby, as Executive Director;)
Arab-American Republican Federation,)
and its treasurer;)
William G. Chirgotis)

CORRECTED CERTIFICATION

I, Hilda Arnold, recording secretary for the Federal
Election Commission Executive Session of October 4, 1990,
do hereby certify that the Commission decided by a vote of
5-0 to take the following actions in MUR 2767:

1. Find reason to believe that the Arab
American Institute, Inc. violated
2 U.S.C. §§ 441b(a) and 441d(a).
2. Find reason to believe that the Arab
American Republican Federation violated
2 U.S.C. §§ 441b(a) and 441d(a).
3. Find reason to believe that the Greek
Americans for Bush and its treasurer,
violated 2 U.S.C. §§ 441a(a)(1)(A) and
441d(a).
4. Find reason to believe that William G.
Chirgotis violated 2 U.S.C.
§§ 441a(a)(1)(A) and 441d(a).
5. Find reason to believe that the George
Bush for President, Inc. and Stan Huckaby,
as treasurer, violated 2 U.S.C. §§ 434(b)(4)
and 441b(a).

(continued)

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6. Approve the appropriate letters and Factual and Legal Analyses, subject to the amendment of the Factual and Legal Analysis to the George Bush for President, Inc. and Stan Huckaby, as treasurer, to be circulated for Commission approval on a tally vote basis.

Commissioners Elliott, Josefiak, McDonald, McGarry and Thomas voted affirmatively for the decision. Commissioner Aikens was absent.

Attest:

Oct. 26, 1990
Date

Hilda Arnold
Hilda Arnold
Administrative Assistant

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

90 OCT 22 PM 4:42

SENSITIVE

October 22, 1990

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble *LMN*
General Counsel

SUBJECT: MUR 2767
-George Bush for President, Inc. and Stan Huckaby, as
treasurer

On October 4, 1990, the Commission approved a factual and legal analysis to the above-captioned respondent consistent with the Commission's reason to believe findings on that same date (Attachment, pp. 7-8). Attached for the Commission's review is a modified factual and legal analysis. This Office recommends that the Commission approve the attached factual and legal analysis for mailing to the respondent.

RECOMMENDATION

Approve the attached factual and legal analysis to George Bush for President, Inc. and Stan Huckaby, as treasurer.

Attachment
Factual and Legal Analysis
Commission Certification

Staff: J. Albert Brown

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

TO: Office of the Commission Secretary
FROM: Office of General Counsel
DATE: October 22, 1990
SUBJECT: MUR 2767 - Memorandum to the Commission

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote	[xx]
Sensitive	[xx]
Non-Sensitive	[]
24 Hour No Objection	[]
Sensitive	[]
Non-Sensitive	[]
Information	[]
Sensitive	[]
Non-Sensitive	[]
Other	[]

DISTRIBUTION

Compliance	xxxx
Audit Matters	[]
Litigation	[]
Closed MUR Letters	[]
Status Sheets	[]
Advisory Opinions	[]
Other (see distribution below)	[]

93043501274

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
George Bush for President, Inc.) MUR 2767
and Stan Huckaby, as treasurer)

CERTIFICATION

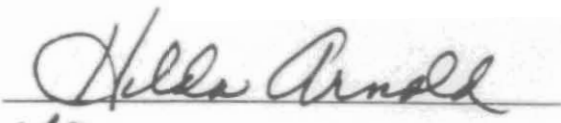
I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 26, 1990, the Commission decided by a vote of 5-0 to approve the factual and legal analysis to George Bush for President, Inc. and Stan Huckaby, as treasurer, as recommended in the General Counsel's Memorandum dated October 22, 1990.

Commissioners Elliott, Josefiak, McDonald, McGarry and Thomas voted affirmatively for the decision; Commissioner Aikens did not vote.

Attest:

Oct. 26, 1990

Date


for Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Monday, Oct. 22, 1990 4:42 p.m.
Circulated to the Commission: Tuesday, Oct. 23, 1990 11:00 a.m.
Deadline for vote: Thursday, Oct. 25, 1990 11:00 a.m.
At the time of deadline, 4 affirmative votes had not been received.
Final vote received: Friday, October 26, 1990 10:21 a.m.

dh

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 27, 1990

Stan Huckaby, Treasurer
George Bush for President, Inc.
228 S. Washington Street
#200
Alexandria, VA 22314

RE: MUR 2767
George Bush for
President, Inc. and
Stan Huckaby, as
treasurer

Dear Mr. Huckaby:

On October 4, 1990, the Federal Election Commission found that there is reason to believe that George Bush for President, Inc. ("the Committee") and you, as treasurer, violated 2 U.S.C. §§ 434(b)(4) and 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office, along with answers to the enclosed questions, within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time

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MUR 2767
Stan Huckaby
page 2

so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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.

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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jim Brown, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lee Ann Elliott
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form
Questions

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS:

George Bush for President,
Inc. and Stan Huckaby, as
treasurer
228 S. Washington Street
#200
Alexandria, VA 22314

MUR: 2767

I. FACTUAL BACKGROUND

Information obtained through discovery by the Federal Election Commission in the above referenced matter has revealed that the Arab American Republican Federation and its treasurer ("AARF") engaged in fundraising activities on behalf of George Bush for President, Inc. and Stan Huckaby, as treasurer ("the Primary Committee"). On January 4, 1988, AARF spent \$1,988.26 to produce and distribute a solicitation letter advocating the election of George Bush. See Attachment I. This letter was signed by Victor Atiyeh, former Governor of Oregon. Attachment I. The mailing was sent on letterhead entitled "Arab Americans for George Bush" and denoted a Washington, D.C. P.O. Box for the return of contributions ranging from \$100 to \$1,000, or more, made payable to "GEORGE BUSH FOR PRESIDENT." It appears that Charles Zogby, National Secretary for AARF in 1988, sent the mailing, which displays no disclaimer, to Republicans on an Arab American Institute, Inc. ("AAI") mailing list that can differentiate between Republicans and Democrats.

As a result of discovery, the Office of the General Counsel has found further information linking AARF to AAI. AARF and AAI

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have the same address, the same phone number, share the same office, and have at least one overlapping worker. The one common worker between both organizations is Charles Zogby, who began working as a Republican liaison for AAI in April, 1985, and became the National Secretary for AARF in 1986, while he was still working and being paid full-time by AAI. In fact, Charles Zogby has admitted splitting his work indiscriminately between both organizations in the same office.

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Apparently AAI and AARF have virtually indistinguishable goals: to encourage Arab Americans to become politically active. AAI provides information on Arab-American elected officials and assists the Arab-American Republican Federation and Arab-American Democratic Federation ("AADF"). Encyclopedia of Associations 1556 (24th ed. 1990). AARF was founded in 1984 to serve as a liaison to the Republican National Committee on behalf of Arab-American Republican clubs in an effort to insure recognition of Arab-American concerns on the national level. AARF furthermore provides a network through which Arab-American public office holders may formulate strategies to advance Arab-American concerns. Id. at 1740.

There also are certain differences between these organizations. First, AAI is an incorporated entity and AARF is not. Second, the organizations are structurally distinct: AAI has a staff of 11 and is a nonmembership organization, while AARF is limited to a staff of one and has 575 members distributed throughout 11 local groups. Furthermore, AARF is chaired by Nader Sayegh, and the Executive Director of AAI is

Dr. James Zogby. Encyclopedia of Associations 1556 and 1740 (24th ed. 1990). Finally, according to the Encyclopedia of Associations, each organization supposedly meets annually, yet Charles Zogby claims that AARF has held no meetings since 1987.

In sum, the ultimate goal of both AAI and AARF is to increase Arab-American political input; with AARF concentrating on Republican Arab-Americans. Given the facts above, it would appear that AAI and AARF are inextricably connected. AARF seems to be the political arm of AAI and may have functioned as the corporation's separate segregated fund.

In order to fund the preparation and distribution of the January, 1988 solicitation, Governor Atiyeh sent out a preliminary mailing to Arab American Republicans asking for financial support. These solicitations were followed by phone calls from Charles Zogby. Eventually more than adequate financial support enabling distribution of the January letter was collected and deposited into the AARF bank account.

In December of 1987, Charles Zogby created the solicitation page of the January 4, 1988 mailing and edited the coverletter at the AAI/AARF office while he was employed by AAI, and an officer of AARF. Charles Zogby further indicated that his past experience with campaign solicitations led him to prepare the solicitation page so as to reflect the name, address, and occupation of the contributor. In actuality there was no organization called Arab Americans for George Bush ("AAGB"), but rather Charles Zogby created that name for this particular mailing and a post office box was set up for the sole purpose of

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receiving the contributions in response to this solicitation. Charles Zogby indicates that he periodically sent the checks he received from the January solicitation to Fred Bush of the Primary Committee. Charles Zogby claims that the funds forwarded to the Primary Committee were somewhat less than \$10,000.

Sometime after the January mailing, in the early part of 1988, Charles Zogby was called into the Primary Committee headquarters and told that he should not have sent out the January solicitation. The Primary Committee then reimbursed AARF \$1,988.26 on March 24, 1988, for printing, postage, and other expenses related to this mailing.

II. LEGAL ANALYSIS

A. Corporate Contribution Violation

Under the Act it is unlawful for any federal candidate or political committee to knowingly accept or receive any contribution from a corporation. 2 U.S.C. § 441b(a). Additionally, no federal candidate or political committee may knowingly accept any contribution in excess of the limitations provided in Section 441a. 2 U.S.C. § 441a(f).

With regard to the January solicitation, there is reason to believe that George Bush for President, Inc. and Stan Huckaby, as treasurer, violated 2 U.S.C. § 441b by accepting a corporate contribution. Although AARF was reimbursed for the January mailing as noted in the amended March report, such reimbursement only serves as a mitigating factor, and does not excuse the violation.

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The expenditures related to the AARF/AAI January, 1988 solicitation/advocacy letter do not appear to fall within the exemptions to the Section 441b prohibition. Commission regulations at 11 C.F.R. § 114.9 allow for the use of corporate facilities, but require reimbursement of the corporation within a commercially reasonable time in the amount of the normal and usual rental charge. 11 C.F.R. § 114.9(d). Here, however, there are indications that AARF/AAI utilized outside facilities in the production, distribution and collection of responses to the January, 1988 mailing. Certainly the procurement of a post office box specifically for the purpose of collecting contributions in response to the January, 1988 mailing cannot be characterized as use of pre-existing corporate facilities. See 11 C.F.R. § 114.9(d). In addition, according to a February 11, 1988 invoice forwarded by AARF to the Primary Committee, the January mailing consisted of 4,783 pieces being posted at \$.22 each, far larger than an 888 piece mailing undertaken by Charles Zogby in October of 1987 for which arrangements were made with an outside firm to reproduce, paste labels, and mail envelopes. Given that AARF has only one employee, it does not appear likely that the 4,783 January solicitation/advocacy letters would have been done "in-house."¹

1. If Charles Zogby handled all of the preparations for the mailing himself his activities probably would not qualify as the "occasional, isolated, or incidental" use of corporate facilities by an employee within the meaning of Commission regulation 11 C.F.R. § 114.9(a).

B. Other Violation

A political committee must disclose in its financial reports all disbursements in their corresponding categories. 2 U.S.C. § 434(b)(4). The Primary Committee reported the March 24, 1988 disbursement to AARF as "event expenses," instead of as an in-kind contribution refund. Therefore, there is reason to believe that George Bush for President, Inc. and Stan Huckaby, as treasurer, violated 2 U.S.C. § 434(b)(4).

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Arab Americans for George Bush

January 4, 1987

Dear Fellow Arab American,

In 1988 Arab Americans face the important task of electing a leader who will ready this great nation to meet the challenges of tomorrow. Our community will be looking to a candidate with leadership and experience. We need a candidate who brings to the presidency the knowledge and capabilities to make the tough and balanced decisions that will allow us to respond to the needs of this country.

I believe that Vice President George Bush offers these unique qualities and that is why I am asking for your support to help make George Bush the next President of the United States.

I am convinced that a George Bush presidency would be one of leadership, vision and integrity.

The crucial issues that face this country in the years ahead, the issues that Arab Americans are most concerned with, are in the area of foreign policy. George Bush is alone among the candidates in his ability to deal with the complex and difficult international questions that we face. The Vice President's experience and personal involvement are vital assets in our working together to resolve these critical issues.

Governor John Sununu of New Hampshire, an Arab American and a National Co-Chair of the Bush campaign, has pledged to make this a winning campaign and to do everything to achieve that goal. I share with him the goal of electing George Bush and ask you to join with us today in this pledge.

Arab Americans for George Bush will not only be committed to electing our candidate as the next president, but we will work to bring Arab Americans into every level of the campaign process.

Please use the enclosed form to join me in this effort. Sign-up today to work with me to bring Arab Americans in at all levels of the process. Additionally, your contribution of \$1000, \$500, \$250 or \$100 will help bring the message of Arab Americans to the Bush campaign.

We have a great deal of work before us, but I am confident that together we can make a difference.

Sincerely,


Victor Atiyeh
Chairman

93043501284

Arab Americans for George Bush

YES! Governor Atiyeh, I want to join Arab Americans for George Bush. Please make me part of the effort to elect George Bush and bring Arab Americans into the campaign process.

Name _____

Occupation/
Employer _____

Address _____

Phone (day) _____ / _____ (eve) _____ / _____

* * *

I would like to sign-up to:

_____ Work as a volunteer at the George Bush for President campaign office in my city.

_____ Help raise an additional \$500 from family and friends.

_____ Organize an Arab American support network for George Bush in my community.

/ * * *

Also, Enclosed is my contribution to the Arab Americans for George Bush effort:*

☐ \$100 ☐ \$250 ☐ \$500 ☐ \$1000 ☐ \$ _____

* Note: Please make checks payable GEORGE BUSH FOR PRESIDENT.

Please return to: Arab Americans for George Bush
P.O. Box 65153
Washington Square Station
Washington, DC 20035

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)
)
)
)

MUR 2767

INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS

TO: Stan Huckaby, Treasurer
George Bush for President, Inc
228 S. Washington Street
#200
Alexandria, VA 22314

93043501286

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals

INSTRUCTIONS

In answering these interrogatories and requests for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in your possession, known by or otherwise available to you, including documents and information appearing in your records

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from September 1, 1987 to August 1, 1988.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

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DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

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INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS

1. State when you first learned of the January 4, 1988 letter which was signed by Victor Atiyeh and is attached hereto as Exhibit I.
2. Describe the circumstances behind how you learned of the January 4, 1988 mailing and your actions upon learning of its existence.
3. Describe the relationship, if any, between George Bush for President, Inc. and the following:
 - a. Victor Atiyeh
 - b. George Salem
 - c. Charles Zogby
 - d. Arab Americans for George Bush
 - e. The Arab-American Republican Federation
 - f. The Arab American Institute
4. Identify all contributions received by George Bush for President, Inc. as a result of the January letter discussed above.
5. Describe how you determined which contributions were made in response to the January letter.
6. Describe the procedure by which George Bush for President, Inc. obtained contributions resulting from the January letter discussed above.
7. Produce all transmittal letters that accompanied contributions resulting from the January letter.
8. Describe the role Fred Bush played in the campaign's receipt of contributions received as a result of the January letter discussed above.

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5-11-87 I
Arab Americans for George Bush

January 4, 1987

Dear Fellow Arab American,

In 1988 Arab Americans face the important task of electing a leader who will ready this great nation to meet the challenges of tomorrow. Our community will be looking to a candidate with leadership and experience. We need a candidate who brings to the presidency the knowledge and capabilities to make the tough and balanced decisions that will allow us to respond to the needs of this country.

I believe that Vice President George Bush offers these unique qualities and that is why I am asking for your support to help make George Bush the next President of the United States.

I am convinced that a George Bush presidency would be one of leadership, vision and integrity.

The crucial issues that face this country in the years ahead, the issues that Arab Americans are most concerned with, are in the area of foreign policy. George Bush is alone among the candidates in his ability to deal with the complex and difficult international questions that we face. The Vice President's experience and personal involvement are vital assets in our working together to resolve these critical issues.

Governor John Sununu of New Hampshire, an Arab American and a National Co-Chair of the Bush campaign, has pledged to make this a winning campaign and to do everything to achieve that goal. I share with him the goal of electing George Bush and ask you to join with us today in this pledge.

Arab Americans for George Bush will not only be committed to electing our candidate as the next president, but we will work to bring Arab Americans into every level of the campaign process.

Please use the enclosed form to join me in this effort. Sign-up today to work with me to bring Arab Americans in at all levels of the process. Additionally, your contribution of \$1000, \$500, \$250 or \$100 will help bring the message of Arab Americans to the Bush campaign.

We have a great deal of work before us, but I am confident that together we can make a difference.

Sincerely,


Victor Atiyeh
Chairman

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Arab Americans for George Bush

YES! Governor Atiyeh, I want to join Arab Americans for George Bush. Please make me part of the effort to elect George Bush and bring Arab Americans into the campaign process

Name _____

Occupation/
Employer _____

Address _____

Phone (day) ____ / ____ (eve) ____ / ____

* * *

I would like to sign-up to:

_____ Work as a volunteer at the George Bush for President campaign office in my city.

_____ Help raise an additional \$500 from family and friends.

_____ Organize an Arab American support network for George Bush in my community.

/ * * *

Also, Enclosed is my contribution to the Arab Americans for George Bush effort:*

[] \$100 [] \$250 [] \$500 [] \$1000 [] \$ _____

* **Note:** Please make checks payable GEORGE BUSH FOR PRESIDENT.

Please return to:

Arab Americans for George Bush
P.O. Box 65153
Washington Square Station
Washington, DC 20035

93043501291



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 27, 1990

Jan W. Baran & Carol A. Laham
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 2767
Bush-Quayle '88, Inc.
and J. Stanley Huckaby,
as treasurer

Dear Mr. Baran and Ms. Laham:

In furtherance of our continuing investigation into the above matter, I have enclosed a second set of Discovery Requests. We request that you submit responses to these requests within 20 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

If you have any questions, please contact Jim Brown, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble

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

BY: Lois G. Lerner
Associate General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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)
)
)

MUR 2767

SECOND SET OF
INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS

TO: Bush-Quayle '88, Inc.
and J. Stanley Huckaby, as treasurer
c/o Jan W. Baran & Carol A. Laham
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

93043501293

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 20 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

INSTRUCTIONS

In answering these interrogatories and requests for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in your possession, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from September 1, 1987 to November 8, 1988.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

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DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

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INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS

1. Identify all ethnic newspapers referenced in your July 24, 1989 response to Interrogatory No. 3 in which the National Voter Coalitions ("NVC") paid for the placement of advertisements urging readers to vote for George Bush.

- (a) Provide the dates each advertisement was placed and the costs incurred per advertisement.
- (b) Produce copies of all such advertisements and invoices related thereto.

2. Identify all "editorials" referenced in your July 24, 1989 discovery response to Interrogatory No. 3 which the NVC sent to ethnic newspapers for voluntary publication.

- (a) Provide the dates each editorial was sent and the costs incurred.
- (b) Produce copies of all such editorials and invoices related thereto.

3. Produce copies of all "weekly mailings" issued to national coalition leaders and referenced in your July 24, 1989 response to Interrogatory No. 3.

4. Your July 24th response and the Mark Holman affidavit indicate that Charles Zogby was responsible primarily for drafting of all of the NVC's weekly informational mailings. Identify all other individuals involved in drafting or revising of such weekly informational mailings prior to their distribution. Provide copies of all such weekly informational mailings.

5. Provide a copy of the "Coalition Handbook" referenced in your July 24, 1989 Response at page 5.

- (a) Identify all persons who received the Coalition Handbook and provide the dates the Handbook was distributed.
- (b) Describe the method(s) the NVC used to ensure that volunteers got a copy of the handbook.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 27, 1990

James Zogby, Executive Director
Arab American Institute
918 16th St., N.W.
Suite 501
Washington, D.C. 20006

RE: MUR 2767
Arab American Institute

Dear Mr. Zogby:

On October 4, 1990, the Federal Election Commission found that there is reason to believe that the Arab American Institute, Inc. ("AAI") violated 2 U.S.C. §§ 441b(a) and 441d(a), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against AAI. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office, along with answers to the enclosed questions, within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against AAI, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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MUR 2767
James Zogby
page 2

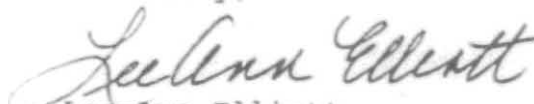
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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.

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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jim Brown, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lee Ann Elliott
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Questions

93043501298

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2767

RESPONDENTS: Arab American Institute, Inc.
and James Zogby, as Executive Director
918 16th St., N.W., Suite 501
Washington, D.C. 20006

I. FACTUAL BACKGROUND

A. Participating Entities

This matter involves a complex factual situation related to a number of individuals and organizations, many of whom are interconnected. Given that fact, it is advisable that the factual background and cast of characters be briefly laid out at the very beginning.

1. Bush-Quayle '88, Inc.

The Bush-Quayle '88, Inc. Committee ("the Presidential Committee") is a common link among all of these individuals and organizations. The Presidential Committee consisted of eight or ten Divisions. This matter focuses on one of those internal campaign divisions, the National Voter Coalitions of Bush-Quayle '88 ("the NVC"). The Director of the NVC was Ceci Cole McInturff; Mark Holman was the Deputy Director. As full-time paid staffers, both McInturff and Holman worked out of the Washington D.C. Presidential Committee Headquarters. Both McInturff and Holman supervised "volunteers" who worked out of the Washington office in pursuit of the Presidential Committee's efforts to involve different coalitions in the Bush-Quayle campaign.

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As part of the effort, ethnic volunteer leaders and steering committee members were chosen by Bush-Quayle '88 state campaign officials to lead Bush-Quayle campaign efforts at the state level. In addition to these local organizations, NVC also chose well-known individuals from distinct ethnic or nationality backgrounds to voluntarily mobilize their respective national communities on behalf of the Bush-Quayle Campaign and form organizations within the framework of what was called the Coalition of American Nationalities ("the Coalition"). These individuals were appointed by the Bush-Quayle '88 campaign and accorded the honorary title of chairman of the various ethnic organizations for Bush-Quayle '88. The present matter involves the Arab Americans for Bush-Quayle '88 ("the Arab Committee"). George R. Salem chaired the Arab Committee under the honorary chairmanship of Governor Victor Atiyeh.

Together, the 17 or 18 volunteer ethnic nationality groups actually constituted the Coalition. The Coalition of American Nationalities was advised and kept informed by four "volunteers" working out of the Washington D.C. campaign headquarters of the Presidential Committee. Each of these individuals was given the title "Director, Coalition of American Nationalities."

2. Arab American Republican Federation/Arab American Institute

The Commission has previously found that there is reason to believe that the Arab American Republican Federation and its treasurer ("AARF"), violated 2 U.S.C. §§ 433, 434 and 441a(a)(1)(A). As a result of discovery, the Office of the

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General Counsel has found information linking AARF with the Arab American Institute ("AAI"). AARF and AAI have the same address, the same phone number, share the same office, and have at least one overlapping worker. The one common worker between both organizations is Charles Zogby, who began working as a Republican liaison for AAI in April, 1985, and became the National Secretary for AARF in 1986, while he was still working and being paid full-time by AAI. In fact, Charles Zogby has admitted splitting his work indiscriminately between both organizations in the same office.

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Apparently AAI and AARF have virtually indistinguishable goals: to encourage Arab Americans to become politically active. AAI provides information on Arab-American elected officials and assists the Arab-American Republican Federation and Arab-American Democratic Federation ("AADF"). Encyclopedia of Associations 1556 (24th ed. 1990).¹ AARF was founded in 1984 to serve as a liaison to the Republican National Committee on behalf of Arab-American Republican clubs in an effort to insure recognition of Arab-American concerns on the national level. AARF furthermore provides a network through which Arab-American public office holders may formulate strategies to advance Arab-American concerns. Id. at 1740

There also are certain differences between these

1. AADF is apparently the counterpart of AARF, only AADF pursues the goal of Arab American political involvement in the Democratic party.

organizations. First, AAI is an incorporated entity and AARF is not. Second, the organizations are structurally distinct: AAI has a staff of 11 and is a nonmembership organization, while AARF is limited to a staff of one and has 575 members distributed throughout 11 local groups. Furthermore, AARF is chaired by Nader Sayegh, and the Executive Director of AAI is Dr. James Zogby. Encyclopedia of Associations 1556 and 1740 (24th ed. 1990). Finally, according to the Encyclopedia of Associations, each organization supposedly meets annually, yet Charles Zogby testified that AARF has held no meetings since 1987

In sum, the ultimate goal of both AAI and AARF is to increase Arab-American political input; with AARF concentrating on Republican Arab-Americans. Given the facts above, it would appear that AAI and AARF are inextricably connected. AARF seems to be the political arm of AAI and may have functioned as the corporation's separate segregated fund.

3. Charles Zogby

The central person involved with the individuals and groups discussed above is Charles Zogby. Charles Zogby had connections with the political campaigns of George Bush beginning in 1984 when he worked as a volunteer for the Reagan-Bush '84 ethnic voters division an average of 40 hours a week from August, 1984, until November, 1984. Charles Zogby's contact with the 1988 Presidential Committee dates at least to late 1987. During the 1988 campaign he was a non-salaried worker for the Presidential Committee and was given the title, "Director, Coalition of

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American Nationalities." He was apparently the Arab Committee's contact person at the Presidential Committee. During this same period, Charles Zogby was also a full-time paid employee for the Arab American Institute, the National Secretary of AARF, and concurrently attended law school at night.

B. Information obtained through discovery

The original findings against AARF were based on complainant's submission of a solicitation mailing dated October 19, 1988, which advocated the election of George Bush for President. This mailing, which cost \$537.52, contained no disclaimer of any type. The mailing's cover-letter was signed by Charles Zogby, whom the complainant alleged upon information and belief was Coalition Director for Ethnics of the Presidential Committee.² The complaint further alleged that Charles Zogby had been receiving either compensation or reimbursement from the Presidential Committee. Based on those facts, complainant alleged that AARF's expenditures were not independent, but instead coordinated with the Presidential Committee. Thus it was alleged that the Presidential Committee had violated 26 U.S.C. § 9003(b) by accepting an in-kind contribution from AARF after certifying to the Commission that it would not accept any contributions in exchange for receiving

2. Although Mr. Sayegh prepared the October 1988 mailing, Charles Zogby read the mailing and signed the accompanying letter. Charles Zogby also prepared the membership card that was included in the mailing. The stated rationale for having Zogby sign the letter was that the recipients were more familiar with Charles Zogby, as National Secretary, than they were AARF's Chairman, Mr. Sayegh.

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public funds. Furthermore, the complaint enclosed a New York Times article stating that the October 19th mailing had been sent to about 1,000 people. In light of the above allegations and the responses thereto, the Commission found that there was reason to believe that AARF violated 2 U.S.C. §§ 433, 434 and 441a(a)(1)(A)

Information obtained through discovery shows that AARF had previously engaged in fundraising activities on behalf of George Bush for President, Inc. and Stan Huckaby, as treasurer ("the Primary Committee"). On January 4, 1988, AARF spent \$1,988.26 to produce and distribute a solicitation letter advocating the election of George Bush. This letter was signed by Victor Atiyeh, former Governor of Oregon. The mailing was sent on letterhead entitled "Arab Americans for George Bush" and denoted a Washington, D.C. P.O. Box for the return of contributions ranging from \$100 to \$1,000, or more, made payable to "GEORGE BUSH FOR PRESIDENT." Charles Zogby testified that the mailing, which displays no disclaimer, was mailed to Republicans on an AAI mailing list that can differentiate between Republicans and Democrats.³

In order to fund the preparation and distribution of the January solicitation, Governor Atiyeh sent out a preliminary mailing to Arab American Republicans asking for financial support. These solicitations were followed by phone calls from

3. In August 1988 AARF also spent \$1,293.75 to purchase "Ethnic Voters for Bush" campaign buttons for the Republican National Convention.

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Charles Zogby. Eventually more than adequate financial support enabling distribution of the January letter was collected and deposited into the AARF bank account.

In December of 1987, Charles Zogby created the solicitation page of the January 4, 1988 mailing and edited the coverletter at the AAI/AARF office while he was employed by AAI, and an officer of AARF. Charles Zogby further indicated that his past experience with campaign solicitations led him to prepare the solicitation page so as to reflect the name, address, and occupation of the contributor. In actuality there was no organization called Arab Americans for George Bush ("AAGB"), but rather Charles Zogby created that name for this particular mailing and a post office box was set up for the sole purpose of receiving the contributions in response to this solicitation. Charles Zogby indicates that he periodically sent the checks he received from the January solicitation to Fred Bush of the Primary Committee. Charles Zogby claims that the funds forwarded to the Primary Committee were somewhat less than \$10,000.

Sometime after the January mailing, in the early part of 1988, Charles Zogby was called into the Primary Committee headquarters and told that he should not have sent out the January solicitation. Despite Charles Zogby's deposition testimony that AAGB was not a part of AARF and his belief that he distributed this solicitation in his individual capacity, the Primary Committee reimbursed AARF \$1,988.26 on March 24, 1988, for printing and postage related to this mailing. Apparently,

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neither the excess funds received for the preparation and mailing of the solicitation letter, nor the funds refunded AARF by GBFP were ever refunded to the original contributors. Instead, this money was left in the AARF account.

Subsequently, in May, 1988, Charles Zogby was invited to attend a meeting to discuss how the ethnic voters program from the 1984 election had been organized and what kind of activities that program had pursued. Also in attendance at that meeting were the following individuals: Mark Holman, the Deputy Director of the Presidential Committee's Bush-Quayle '88 National Voter Coalition; Mark Valenti, of the Republican National Committee; and George Salem, former director of the Reagan/Bush '84 campaign ethnic voters section and then AAI board member, as well as, future Chairman of the 1988 Arab Committee. Other discovery materials indicate that George Salem had previously attempted to advance Arab-American concerns on behalf of AAI by serving as AAI's liaison to the Republican National Committee.⁴

Immediately after the May meeting Charles Zogby contacted Mark Holman to offer his services for the 1988 Presidential Committee's campaign effort. In the early part of July, 1988, Charles Zogby began working for the Presidential Committee. At that time Charles Zogby began to attend a series of

4. According to an "Election Report" produced by AARF for its members, George Salem, "representing the Arab American Institute, appeared before the Republican National Committee's Committee on the Platform on March 30, 1988, urging the Party to include in its platform a plank calling for Middle East peace based on the formula of Palestinian self-determination."

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weekly/biweekly meetings at the Presidential Committee's national headquarters to plan the Coalition of American Nationalities' strategy. Those meetings were attended by Mark Holman, Mark Valenti, Myron Wyslyk, Andrew Falkewicz and Ava Netarowicz. Mr. Wyslyk, Mr. Falkewicz, Ms. Netarowicz, and Mr. Zogby were each given the title "Director, Coalition of American Nationalities." Zogby testified that the discussions at such meetings, among other things, focused on what type of programs the Coalition would pursue, the idea of sending direct letters, and the content of outgoing Coalition newsletters on the candidate's ethnic oriented activities and viewpoints.

One of Charles Zogby's responsibilities at the Presidential Committee was to be in charge of assembling the Coalition's weekly newsletter and sending it to the various directors of the local volunteer ethnic organization. At first this newsletter went out to around 400 people, but its weekly circulation eventually reached approximately 1,000. At the same time Charles Zogby was producing the Coalition's weekly newsletters, he was preparing and distributing monthly Arab American Republican Federation Election '88 Reports. These reports contained information of interest to Arab American Republicans on the 1988 Republican election process.

The Presidential Committee sent a memorandum dated October 12, 1988, to all National and State Coalition leaders. That memo from Ceci Cole McInturff, Director for NVC, states that all fundraising efforts undertaken by coalition members should be done in their individual capacities and not on behalf

of the Presidential Committee. The memo states that any legal questions should be directed toward the Presidential Committee's General Counsel at a phone number given in the memo.

II. LEGAL ANALYSIS

A. Coordination

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A major issue raised in this matter centers on whether expenditures made by AAI/AARF to benefit the Primary and Presidential Committees qualify as independent expenditures under the Federal Election Campaign Act of 1971, as amended ("the Act"), and implementing Commission Regulations. If an expenditure does not qualify under the Commission's regulations as an independent expenditure, it is treated as an in-kind contribution to the candidate or candidate's authorized committee on whose behalf it is made. 11 C.F.R. § 109.1(c). Under the Presidential Election Campaign Fund Act ("the Fund Act"), organizations may make independent expenditures on behalf of a presidential candidate receiving public financing. 26 U.S.C. § 9001 et seq. However, candidates receiving public funds under the Fund Act cannot accept any outside contributions. 26 U.S.C. § 9003(b)(2).

Section 431(17) of the Act defines "independent expenditure" as:

[A]n 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 of, any candidate, or any authorized committee or agent of such candidate.

Commission implementing regulations at Part 109 establish guidelines for determining whether an expenditure falls within this statutory definition. Section 109.1(b)(4)(i) clarifies the terms "cooperation" and "in consultation with" by defining them to mean "any arrangement, coordination, or direction by the candidate or his or her agent prior to the publication, distribution, display or broadcast of the communication." The regulation further states that an expenditure is presumed to be coordinated when it is:

(A) Based on information about the candidate's 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; [or 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.

11 C.F.R. § 109.1(b)(4)(i)(A) & (B). Central to the inquiry of whether these presumptions of coordination apply is the issue of whether Charles Zogby was an agent of the Primary or Presidential Committees. Commission regulations define an agent as follows:

[A]ny person who has actual oral or written authority, either express or implied, to make or to authorize the making of expenditures on behalf of a candidate, or means any person who has been placed in a position within the campaign organization where it would reasonably appear that in the ordinary course of campaign-related activities he or she may authorize expenditures. 11 C.F.R. § 109.1(b)(5) (emphasis added).

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The information disclosed through discovery reveals that Charles Zogby was an agent of the Presidential Committee and in that capacity coordinated the expenditures of AAI and AARF to the benefit of the Presidential Committee. First, Charles Zogby had all of the trappings of authority: he held the title of Director, Coalition of American Nationalities; used official Bush-Quayle business cards; had his own desk at the National Bush-Quayle '88 headquarters; and was listed in the campaign telephone directory.

Moreover, during his 35+ hour work week for the Presidential Committee, Zogby contacted individuals to see if they would become members of the newly formed ethnic coalitions. During the course of such conversations Zogby would state his name, identify that he was from the Bush campaign and that he served on the Presidential Committee's Coalition of American Nationalities. Charles Zogby also became one of the primary contacts with individuals volunteering for the ethnic coalition groups. He gave advice on how to mobilize the different ethnic organizations and ordered ethnic/nationality stationary which he sent out to at least one of the ethnic organizations.

Charles Zogby's position within the campaign organization made it reasonable to assume that he had either express or implied authorization to make expenditures. In short, the evidence on hand clearly establishes that Zogby was placed in a position within the campaign organization where it would reasonably appear that he could authorize expenditures, which is

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all that is required to establish agency under the Commission's Regulation. See 11 C.F.R. § 109.1(b)(5).

As noted earlier, coordination may be presumed where expenditures are made based on information about the candidate's plans, projects, or needs provided by an agent of the candidate's committee. See 11 C.F.R. § 109.1(b)(4)(i)(A). In this matter, Charles Zogby's presence and apparent involvement in the campaign organization and on-going operation of the Coalition set up by the NVC indicates that he had access to the candidate's plans, projects, and needs in relation to the Presidential Committee's ethnic outreach. As discussed, Charles Zogby attended weekly strategy meetings and frequently consulted with Mark Holman, the paid campaign Deputy Director of the Coalitions Division. Charles Zogby also had contact with Ceci McInturff, the director of the NVC, and Leslie Goodman, the NVC press relations director. In addition, as part of his responsibilities, Zogby put together information for at least one press announcement and helped publish a weekly campaign newsletter. Thus, Charles Zogby was in direct contact with all levels of the campaign hierarchy and had access to information regarding the campaign's plans and goals. Cf. MUR 2277 (no direct contact with political committee was an important factor in finding no coordination). Accordingly, under Commission regulations the expenditures made by AAI and AARF were not

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independent and should be treated as in-kind contributions.⁵

Moreover, the evidence adduced during discovery suggests that Charles Zogby may have utilized his knowledge of the Presidential Committee's ethnic outreach efforts in connection with the AAI and AARF expenditures. Charles Zogby composed and distributed AARF financed monthly Election Reports containing information about Arab American Republican activities, at the same time he worked on the Coalition's weekly newsletter. In sum, Charles Zogby's assertion that the October 19, 1988 AARF mailing was neither authorized by, nor coordinated with the Presidential Committee is inconsistent with the preponderance of other available evidence. Consequently, rather than being independent expenditures, it appears that the expenditures discussed above constituted coordinated in-kind contributions.

B. Corporate Contributions

The Act specifies that corporations are prohibited from making federal election contributions out of corporate treasury funds. 2 U.S.C. § 441b(a). A contribution or expenditure is defined to include "any direct or indirect payment, distribution, loan, advance, deposit or gift of money or any services, or anything of value... to any candidate, campaign committee... in connection with" any federal election.

2 U.S.C. § 441b(b)(2). It is also unlawful for any officer or

5. Charles Zogby's asserted independence is further overcome by his acknowledged receipt of a \$150 reimbursement from the Presidential Committee. Under 11 C.F.R. § 109.1(b)(4)(i)(B) coordination may be presumed by showing that expenditures were made through any person who has received any form of reimbursement from the candidate's committee.

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director to consent to a corporate contribution or expenditure in connection with a federal campaign. 2 U.S.C. §§ 441b(a). Further, a corporation may not serve as a conduit or intermediary to facilitate the making of contributions, such as by providing envelopes addressed to the candidate or committee. See AOs 1987-29, 1986-4, and 1982-2.

However, there are certain exemptions from Section 441b's broad prohibitions. Section 441b(b)(2)(A), for example, exempts a corporation's internal communications with members of its restricted class from the definition of contribution or expenditure.⁶ In addition, 11 C.F.R. § 114.9(a) enables employees or shareholders to make occasional, isolated or incidental use of corporate facilities for "individual volunteer activity," provided certain requirements are met. First, the use of corporate facilities must be by stockholders or employees of the corporation. Second, the use must be occasional, isolated or incidental. Third, the activity must be on a volunteer basis. In addition to these three requirements, the stockholder or employee using the corporate facilities is required to reimburse the corporation to the extent that the overhead or operating costs of the corporation are increased. See also 11 C.F.R. § 114.9(c) (allowing any person to use the facilities of a corporation to produce materials in connection

6. For purposes of Section 441b, the term "executive or administrative personnel" means individuals employed by a corporation who are paid on a salary basis, and who have policymaking, managerial, professional or supervisory responsibilities. 2 U.S.C. § 441b(b)(7), 11 C.F.R. § 114.1(c)

with a Federal election, provided that person reimburses the corporation within a commercially reasonable time for the normal and usual charge for producing the materials in the commercial market)

It appears that AARF/AAI violated the statutory prohibition against corporate contributions on several grounds. For example Charles Zogby was paid a salary by AAI during the time period in which he was working over 35 hours a week with the Presidential Committee. In addition, Charles Zogby used AARF/AAI resources to produce both the January solicitation letter and the October mailing. In both instances AAI/AARF facilities, computers, and mailing lists were essential to the ultimate mailing. These activities were coordinated through an agent of the campaign, and therefore must be treated as in-kind contributions. Given the utilization of corporate resources in their production, it appears that they constitute prohibited corporate contributions.⁷

The expenditures related to the AARF/AAI January, 1988 solicitation/advocacy letter do not appear to fall within the exemptions to the Section 441b prohibition. Commission regulations at 11 C.F.R. § 114.9 allow for the use of corporate facilities, but require reimbursement of the corporation within a commercially reasonable time in the amount of the normal and usual rental charge. 11 C.F.R. § 114.9(d). Here, however,

7. It is also noted that the Arab American Republican Federation spent \$1,293.75 for "Ethnic Voters for Bush" campaign buttons for the Republican National Convention.

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there are indications that AARF/AAI utilized outside facilities in the production, distribution and collection of responses to the January, 1988 mailing. Certainly the procurement of a post office box specifically for the purpose of collecting contributions in response to the January, 1988 mailing cannot be characterized as use of pre-existing corporate facilities. See 11 C.F.R. § 114.9(d). In addition, according to a February 11, 1988 invoice forwarded by AARF to the Primary Committee, the January mailing consisted of 4,783 pieces being posted at \$.22 each, far larger than an 888 piece mailing undertaken by Charles Zogby in October of 1987 for which arrangements were made with an outside firm to reproduce, paste labels, and mail envelopes. Given that AARF has only one employee, it does not appear likely that the 4,783 January solicitation/advocacy letters would have been done "in-house."⁸

In light of the foregoing, there is reason to believe that the Arab American Institute, Inc. violated 2 U.S.C. § 441b.

C. Other Violations

Section 441d of the Act mandates that all express political advocacy communications, or general public political advertising, must carry certain disclaimers. These disclaimers are required to state as follows:

- (1) if paid for and authorized by a candidate, an authorized political

8. If Charles Zogby handled all of the preparations for the mailing himself his activities probably would not qualify as the "occasional, isolated, or incidental" use of corporate facilities by an employee within the meaning of Commission regulation 11 C.F.R. § 114.9(a).

committee of a candidate, or its agents, shall clearly state that the communication has been paid for by such authorized political committee, or

(2) if paid for by other persons but authorized by a candidate, an authorized political committee of a candidate, or its agents, shall clearly state that the communication is paid for by such other persons and authorized by such authorized political committee;

(3) if not authorized by a candidate, an authorized political committee of a candidate, or its agents, shall clearly state the name of the person who paid for the communication and state that the communication is not authorized by any candidate or candidate's committee.

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The October 1988 AARF mailing was sent out on a combination of Arab American Republican Federation letterhead, Bush-Quayle '88 letterhead, as well as stationary denoted as coming from the Arab American Supporters for George Bush. None of the pages comprising this October 1988 mailing displays a disclaimer. Likewise, AARF's January 1988 mailing was sent out on letterhead entitled Arab-Americans for George Bush, an apparently fictitious organization. These mailings, which expressly advocated the election of George Bush, failed to include an appropriate disclaimer. Thus, there is reason to believe that AAI violated 2 U.S.C. § 441d(a).

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)
) MUR 2767
)

INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS

TO: James Zogby, Executive Director
Arab American Institute, Inc.
918 16th St., N.W., Suite 501
Washington, D.C. 20006

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

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INSTRUCTIONS

In answering these interrogatories and requests for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in your possession, known by or otherwise available to you, including documents and information appearing in your records

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from September 1, 1987 to November 8, 1988.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

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DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

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INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS

1. Describe the purpose(s) and goal(s) of the Arab American Institute, Inc. ("AAI") and detail the methods used to achieve them.
2. State whether AAI has a written policy against accepting financial support from corporate or labor organizations. If so, produce a copy of that policy.
3. State whether AAI is a tax exempt organization, and if so, specify its exact status under the Internal Revenue Code.
4. Produce each of the following documents pertaining to AAI:
 - (a) Articles of Incorporation and Bylaws
 - (b) Organizational rosters
 - (c) Employee manuals.
5. Describe the relationship between AAI and the Arab American Republican Federation ("AARF") including but not limited to the following aspects:
 - (a) structural or organizational differences
 - (b) the identities of each organization's board of directors and employees
 - (c) whether each organization maintains separate bank accounts and payrolls; and if so where
 - (d) the location of each organization's office, and if at the same address, how separation is maintained.
6. Provide all supporting documentation for the assertion that AARF pays AAI for its share of staff support and office space.
7. Describe the relationship between AAI and the Arab American Democratic Federation ("AADF"); including but not limited to the following aspects:
 - (a) any structural or organizational differences
 - (b) the identities of each organization's board of directors and employees
 - (c) whether each organization maintains separate bank accounts and payrolls; and if so where
 - (d) the location of each organizations office, and if at the same address, how separation is maintained.

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8. Identify all lists from which names were obtained for AAI/AARF/AADF mailings which advocated or supported the election or defeat of George Bush for President. Specify which lists were used for each such mailing.

9. Describe the relationship between AAI and Charles Zogby, specifically referencing his position and employment status at the time of any mailings advocating the election or defeat of George Bush for President

- (a) State the number of hours a week, and by whom, Charles Zogby was being paid during the period in question.

11. Identify all individuals who supervised or assisted in the mailings referenced in response to question 8.

12. Identify all AAI facilities and equipment utilized in the production and distribution of the mailings referenced in response to question 8.

13. Identify all outside companies used to produce or distribute the January 4, 1988 letter attached to these interrogatories and provide all billing statements and photocopies of canceled checks for such services rendered.

14. State whether any funds received in response to the January letter discussed above were placed in an AAI bank account. If so, provide all information pertinent to such deposits, including but not limited to:

- a. the name of bank
- b. the account number
- c. the contributors' name and date of original contribution
- d. the ultimate recipient of the funds and the date of transfer of the funds, if the funds were transferred

15. Describe all contacts between AAI and the George Bush presidential campaign. Identify all individuals involved in such contacts.

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Arab Americans for George Bush

January 4, 1987

Dear Fellow Arab American,

In 1988 Arab Americans face the important task of electing a leader who will ready this great nation to meet the challenges of tomorrow. Our community will be looking to a candidate with leadership and experience. We need a candidate who brings to the presidency the knowledge and capabilities to make the tough and balanced decisions that will allow us to respond to the needs of this country.

I believe that Vice President George Bush offers these unique qualities and that is why I am asking for your support to help make George Bush the next President of the United States.

I am convinced that a George Bush presidency would be one of leadership, vision and integrity.

The crucial issues that face this country in the years ahead, the issues that Arab Americans are most concerned with, are in the area of foreign policy. George Bush is alone among the candidates in his ability to deal with the complex and difficult international questions that we face. The Vice President's experience and personal involvement are vital assets in our working together to resolve these critical issues.

Governor John Sununu of New Hampshire, an Arab American and a National Co-Chair of the Bush campaign, has pledged to make this a winning campaign and to do everything to achieve that goal. I share with him the goal of electing George Bush and ask you to join with us today in this pledge.

Arab Americans for George Bush will not only be committed to electing our candidate as the next president, but we will work to bring Arab Americans into every level of the campaign process.

Please use the enclosed form to join me in this effort. Sign-up today to work with me to bring Arab Americans in at all levels of the process. Additionally, your contribution of \$1000, \$500, \$250 or \$100 will help bring the message of Arab Americans to the Bush campaign.

We have a great deal of work before us, but I am confident that together we can make a difference.

Sincerely,


Victor Atiyeh
Chairman

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Arab Americans for George Bush

YES! Governor Atiyeh, I want to join Arab Americans for George Bush. Please make me part of the effort to elect George Bush and bring Arab Americans into the campaign process.

Name _____
Occupation/
Employer _____
Address _____

Phone (day) ____/____ (eve) ____/____
* * *

I would like to sign-up to:

- ____ Work as a volunteer at the George Bush for President campaign office in my city.
____ Help raise an additional \$500 from family and friends.
____ Organize an Arab American support network for George Bush in my community.

/ * * *

Also, Enclosed is my contribution to the Arab Americans for George Bush effort:*

☐ \$100 ☐ \$250 ☐ \$500 ☐ \$1000 ☐ \$ _____

* **Note:** Please make checks payable GEORGE BUSH FOR PRESIDENT.

Please return to:

Arab Americans for George Bush
P.O. Box 65153
Washington Square Station
Washington, DC 20035

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 27, 1990

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Richard Mayberry, Esquire
Richard Mayberry & Associates
Fifth Floor
888 16th Street, N.W.
Washington, D.C. 20006

RE: MUR 2767
Arab-American Republican
Federation

Dear Mr. Mayberry:

On November 7, 1988, the Federal Election Commission notified your clients, the Arab-American Republican Federation and its treasurer ("AARF"), of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was enclosed with that notification.

Upon further review of the allegations contained in the complaint, information ascertained during the subsequent investigation, and information supplied by your clients, the Commission, on October 4, 1990, found that there is also reason to believe that the Arab-American Republican Federation and its treasurer violated 2 U.S.C. §§ 441b(a) and 441d(a), provisions of the Act. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, your clients have an opportunity to demonstrate that no action should be taken against them. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office along with answers to the enclosed questions within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

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MUR 2767
Richard Mayberry
page 2

In the absence of any additional information which demonstrates that no further action should be taken against your clients, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 investigation to be made public.

If you have any questions, please contact Jim Brown, the attorney assigned to this matter, at (202) 376-8200.

Sincerely


Lee Ann Elliott
Chairman

Enclosures
Factual and Legal Analysis
Questions

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2767

RESPONDENTS: Arab-American Republican Federation,
and its treasurer
c/o Richard Mayberry, Esquire
Richard Mayberry & Associates
888 16th Street, N.W., Fifth Floor
Washington, D.C. 20006

I. FACTUAL BACKGROUND

A. Participating Entities

This matter involves a complex factual situation related to a number of individuals and organizations, many of whom are interconnected. Given that fact, it is advisable that the factual background and cast of characters be briefly laid out at the very beginning.

1. Bush-Quayle '88, Inc.

The Bush-Quayle '88, Inc. Committee ("the Presidential Committee") is a common link among all of these individuals and organizations. The Presidential Committee consisted of eight or ten Divisions. This matter focuses on one of those internal campaign divisions, the National Voter Coalitions of Bush-Quayle '88 ("the NVC"). The Director of the NVC was Ceci Cole McInturff; Mark Holman was the Deputy Director. As full-time paid staffers, both McInturff and Holman worked out of the Washington D.C. Presidential Committee Headquarters. Both McInturff and Holman supervised "volunteers" who worked out of the Washington office in pursuit of the Presidential Committee's

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efforts to involve different coalitions in the Bush-Quayle campaign.

As part of the effort, ethnic volunteer leaders and steering committee members were chosen by Bush-Quayle '88 state campaign officials to lead Bush-Quayle campaign efforts at the state level. In addition to these local organizations, NVC also chose well-known individuals from distinct ethnic or nationality backgrounds to voluntarily mobilize their respective national communities on behalf of the Bush-Quayle Campaign and form organizations within the framework of what was called the Coalition of American Nationalities ("the Coalition"). These individuals were appointed by the Bush-Quayle '88 campaign and accorded the honorary title of chairman of the various ethnic organizations for Bush-Quayle '88. The present matter involves the Arab Americans for Bush-Quayle '88 ("the Arab Committee"). George R. Salem chaired the Arab Committee under the honorary chairmanship of Governor Victor Atiyeh

Together, the 17 or 18 volunteer ethnic nationality groups actually constituted the Coalition. The Coalition of American Nationalities was advised and kept informed by four "volunteers" working out of the Washington D.C. campaign headquarters of the Presidential Committee. Each of these individuals was given the title "Director, Coalition of American Nationalities." Charles Zogby Transcript pg. 19.

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2. Arab American Republican Federation/Arab American Institute

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The Commission has previously found that there is reason to believe that the Arab American Republican Federation and its treasurer, violated 2 U.S.C. §§ 433, 434 and 441a(a)(1)(A). As a result of discovery, the Office of the General Counsel has found information linking AARF with the Arab American Institute ("AAI"). AARF and AAI have the same address, the same phone number, share the same office, and have at least one overlapping worker. The one common worker between both organizations is Charles Zogby, who began working as a Republican liaison for AAI in April, 1985, and became the National Secretary for AARF in 1986, while he was still working and being paid full-time by AAI. In fact, Charles Zogby has admitted splitting his work indiscriminately between both organizations in the same office. Charles Zogby Transcript pg. 116.

Apparently AAI and AARF have virtually indistinguishable goals: to encourage Arab Americans to become politically active. AAI provides information on Arab-American elected officials and assists the Arab-American Republican Federation and Arab-American Democratic Federation ("AADF"). Encyclopedia of Associations 1556 (24th ed. 1990).¹ AARF was founded in 1984 to serve as a liaison to the Republican National Committee on behalf of Arab-American Republican clubs in an effort to insure recognition of Arab-American concerns on the national level.

1. AADF is apparently the counterpart of AARF, only AADF pursues the goal of Arab American political involvement in the Democratic party

AARF furthermore provides a network through which Arab-American public office holders may formulate strategies to advance Arab-American concerns. Id. at 1740.

There also are certain differences between these organizations. First, AAI is an incorporated entity and AARF is not. Second, the organizations are structurally distinct: AAI has a staff of 11 and is a nonmembership organization, while AARF is limited to a staff of one and has 575 members distributed throughout 11 local groups. Furthermore, AARF is chaired by Nader Sayegh, and the Executive Director of AAI is Dr. James Zogby. Encyclopedia of Associations 1556 and 1740 (24th ed. 1990). Finally, according to the Encyclopedia of Associations, each organization supposedly meets annually, yet Charles Zogby testified that AARF has held no meetings since 1987. Charles Zogby transcript, pg. 120.

In sum, the ultimate goal of both AAI and AARF is to increase Arab-American political input; with AARF concentrating on Republican Arab-Americans. Given the facts above, it would appear that AAI and AARF are inextricably connected. AARF seems to be the political arm of AAI and may have functioned as the corporation's separate segregated fund.

3. Charles Zogby

The central person involved with the individuals and groups discussed above is Charles Zogby. Charles Zogby had connections with the political campaigns of George Bush beginning in 1984 when he worked as a volunteer for the Reagan-Bush '84 ethnic voters division an average of 40 hours a week from August, 1984,

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until November, 1984. Charles Zogby's contact with the 1988 Presidential Committee dates at least to late 1987. During the 1988 campaign he was a non-salaried worker for the Presidential Committee and was given the title, "Director, Coalition of American Nationalities." He was apparently the Arab Committee's contact person at the Presidential Committee. During this same period, Charles Zogby was also a full-time paid employee for the Arab American Institute, the National Secretary of AARF, and concurrently attended law school at night.

B. Information obtained through discovery

The original findings against AARF were based on complainant's submission of a solicitation mailing dated October 19, 1988, which advocated the election of George Bush for President. This mailing, which cost \$537.52, contained no disclaimer of any type. The mailing's cover-letter was signed by Charles Zogby, whom the complainant alleged upon information and belief was Coalition Director for Ethnic of the Presidential Committee.² The complaint further alleged that Charles Zogby had been receiving either compensation or reimbursement from the Presidential Committee. Based on those facts, complainant alleged that AARF's expenditures were not independent, but instead coordinated with the Presidential

2. Although Mr. Sayegh prepared the October 1988 mailing, Charles Zogby read the mailing and signed the accompanying letter. Charles Zogby also prepared the membership card that was included in the mailing. The stated rationale for having Zogby sign the letter was that the recipients were more familiar with Charles Zogby, as National Secretary, than they were AARF's Chairman, Mr. Sayegh. Charles Zogby Transcript at 87.

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Committee. Thus it was alleged that the Presidential Committee had violated 26 U.S.C. § 9003(b) by accepting an in-kind contribution from AARF after certifying to the Commission that it would not accept any contributions in exchange for receiving public funds. Furthermore, the complaint enclosed a New York Times article stating that the October 19th mailing had been sent to about 1,000 people. In light of the above allegations and the responses thereto, the Commission found that there was reason to believe that AARF violated 2 U.S.C. §§ 433, 434 and 441a(a)(1)(A)

Information obtained through discovery shows that AARF had previously engaged in fundraising activities on behalf of George Bush for President, Inc. and Stan Huckaby, as treasurer ("the Primary Committee"). On January 4, 1988, AARF spent \$1,988.26 to produce and distribute a solicitation letter advocating the election of George Bush. This letter was signed by Victor Atiyeh, former Governor of Oregon. Charles Zogby Transcript pg. 125. The mailing was sent on letterhead entitled "Arab Americans for George Bush" and denoted a Washington, D.C. P.O. Box for the return of contributions ranging from \$100 to \$1,000, or more, made payable to "GEORGE BUSH FOR PRESIDENT." Charles Zogby testified that the mailing, which displays no disclaimer, was mailed to Republicans on an AAI mailing list that can differentiate between Republicans and Democrats. Charles Zogby

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Transcript at 142.³

In order to fund the preparation and distribution of the January solicitation, Governor Atiyeh sent out a preliminary mailing to Arab American Republicans asking for financial support. These solicitations were followed by phone calls from Charles Zogby. Eventually more than adequate financial support enabling distribution of the January letter was collected and deposited into the AARF bank account. Id. at 149.

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In December of 1987, Charles Zogby created the solicitation page of the January 4, 1988 mailing and edited the coverletter at the AAI/AARF office while he was employed by AAI, and an officer of AARF. Charles Zogby further indicated that his past experience with campaign solicitations led him to prepare the solicitation page so as to reflect the name, address, and occupation of the contributor. In actuality there was no organization called Arab Americans for George Bush ("AAGB"), but rather Charles Zogby created that name for this particular mailing and a post office box was set up for the sole purpose of receiving the contributions in response to this solicitation. Charles Zogby indicates that he periodically sent the checks he received from the January solicitation to Fred Bush of the Primary Committee. Charles Zogby claims that the funds forwarded to the Primary Committee were somewhat less than \$10,000.

3. In August 1988 AARF also spent \$1,293.75 to purchase "Ethnic Voters for Bush" campaign buttons for the Republican National Convention.

Sometime after the January mailing, in the early part of 1988, Charles Zogby was called into the Primary Committee headquarters and told that he should not have sent out the January solicitation. Id. at 145. Despite Charles Zogby's deposition testimony that AAGB was not a part of AARF and his belief that he distributed this solicitation in his individual capacity, the Primary Committee reimbursed AARF \$1,988.26 on March 24, 1988, for printing and postage related to this mailing. Apparently, neither the excess funds received for the preparation and mailing of the solicitation letter, nor the funds refunded AARF by GBFP were ever refunded to the original contributors. Instead, this money was left in the AARF account. Id. at 150.

Subsequently, in May, 1988, Charles Zogby was invited to attend a meeting to discuss how the ethnic voters program from the 1984 election had been organized and what kind of activities that program had pursued. Also in attendance at that meeting were the following individuals: Mark Holman, the Deputy Director of the Presidential Committee's Bush-Quayle '88 National Voter Coalition; Mark Valenti, of the Republican National Committee; and George Salem, former director of the Reagan/Bush '84 campaign ethnic voters section and then AAI board member, as well as, future Chairman of the 1988 Arab Committee. Id. at 13-15. Other discovery materials indicate that George Salem had previously attempted to advance Arab-American concerns on behalf of AAI by serving as AAI's

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liaison to the Republican National Committee.⁴

Immediately after the May meeting Charles Zogby contacted Mark Holman to offer his services for the 1988 Presidential Committee's campaign effort. Id. at 15. In the early part of July, 1988, Charles Zogby began working for the Presidential Committee. Id. at 18. At that time Charles Zogby began to attend a series of weekly/biweekly meetings at the Presidential Committee's national headquarters to plan the Coalition of American Nationalities' strategy. Those meetings were attended by Mark Holman, Mark Valenti, Myron Wyslyk, Andrew Falkewicz and Ava Netarowicz. Mr. Wyslyk, Mr. Falkewicz, Ms. Netarowicz, and Mr. Zogby were each given the title "Director, Coalition of American Nationalities." Id. at 19. Zogby testified that the discussions at such meetings, among other things, focused on what type of programs the Coalition would pursue, the idea of sending direct letters, and the content of outgoing Coalition newsletters on the candidate's ethnic oriented activities and viewpoints.

One of Charles Zogby's responsibilities at the Presidential Committee was to be in charge of assembling the Coalition's weekly newsletter and sending it to the various directors of the local volunteer ethnic organization. At first this newsletter

4. According to an "Election Report" produced by AARF for its members, George Salem, "representing the Arab American Institute, appeared before the Republican National Committee's Committee on the Platform on March 30, 1988, urging the Party to include in its platform a plank calling for Middle East peace based on the formula of Palestinian self-determination." See Charles Zogby Transcript, Exhibit 7, pg. 2.

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went out to around 400 people, but its weekly circulation eventually reached approximately 1,000. At the same time Charles Zogby was producing the Coalition's weekly newsletters, he was preparing and distributing monthly Arab American Republican Federation Election '88 Reports. These reports contained information of interest to Arab American Republicans on the 1988 Republican election process. Charles Zogby Transcript pg. 162.

The Presidential Committee sent a memorandum dated October 12, 1988, to all National and State Coalition leaders. That memo from Ceci Cole McInturff, Director for NVC, states that all fundraising efforts undertaken by coalition members should be done in their individual capacities and not on behalf of the Presidential Committee. The memo states that any legal questions should be directed toward the Presidential Committee's General Counsel at a phone number given in the memo.

II. LEGAL ANALYSIS

A. Coordination

A major issue raised in this matter centers on whether expenditures made by AAI and AARF to benefit the Primary and Presidential Committees qualify as independent expenditures under the Federal Election Campaign Act of 1971, as amended ("the Act"), and implementing Commission Regulations. If an expenditure does not qualify under the Commission's regulations as an independent expenditure, it is treated as an in-kind contribution to the candidate or candidate's authorized committee on whose behalf it is made. 11 C.F.R. § 109.1(c).

Under the Presidential Election Campaign Fund Act ("the Fund Act"), organizations may make independent expenditures on behalf of a presidential candidate receiving public financing.

26 U.S.C. § 9001 et seq. However, candidates receiving public funds under the Fund Act cannot accept any outside contributions. 26 U.S.C. § 9003(b)(2)

Section 431(17) of the Act defines "independent expenditure" as:

[A]n 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 of, any candidate, or any authorized committee or agent of such candidate.

Commission implementing regulations at Part 109 establish guidelines for determining whether an expenditure falls within this statutory definition. Section 109.1(b)(4)(i) clarifies the terms "cooperation" and "in consultation with" by defining them to mean "any arrangement, coordination, or direction by the candidate or his or her agent prior to the publication, distribution, display or broadcast of the communication." The regulation further states that an expenditure is presumed to be coordinated when it is:

(A) Based on information about the candidate's 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; [or 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

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authorized committee, or who is, or has been, receiving any form of compensation or reimbursement from the candidate, the candidate's committee or agent.

11 C.F.R. § 109.1(b)(4)(i)(A) & (B). Central to the inquiry of whether these presumptions of coordination apply is the issue of whether Charles Zogby was an agent of the Primary or Presidential Committees. Commission regulations define an agent as follows

[A]ny person who has actual oral or written authority, either express or implied, to make or to authorize the making of expenditures on behalf of a candidate, or means any person who has been placed in a position within the campaign organization where it would reasonably appear that in the ordinary course of campaign-related activities he or she may authorize expenditures. 11 C.F.R. § 109.1(b)(5) (emphasis added).

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The information disclosed through discovery reveals that Charles Zogby was an agent of the Presidential Committee and in that capacity coordinated the expenditures of AAI and AARF to the benefit of the Presidential Committee. First, Charles Zogby had all of the trappings of authority: he held the title of Director, Coalition of American Nationalities; used official Bush-Quayle business cards; had his own desk at the National Bush-Quayle '88 headquarters; and was listed in the campaign telephone directory.

Moreover, during his 35+ hour work week for the Presidential Committee, Zogby contacted individuals to see if they would become members of the newly formed ethnic coalitions. During the course of such conversations Zogby would state his

name, identify that he was from the Bush campaign and that he served on the Presidential Committee's Coalition of American Nationalities. Charles Zogby also became one of the primary contacts with individuals volunteering for the ethnic coalition groups. He gave advice on how to mobilize the different ethnic organizations and ordered ethnic/nationality stationary which he sent out to at least one of the ethnic organizations. Charles Zogby Transcript at 31 & 45.

Charles Zogby's position within the campaign organization made it reasonable to assume that he had either express or implied authorization to make expenditures. In short, the evidence on hand clearly establishes that Zogby was placed in a position within the campaign organization where it would reasonably appear that he could authorize expenditures, which is all that is required to establish agency under the Commission's Regulation. See 11 C.F.R. § 109.1(b)(5)

As noted earlier, coordination may be presumed where expenditures are made based on information about the candidate's plans, projects, or needs provided by an agent of the candidate's committee. See 11 C.F.R. § 109.1(b)(4)(i)(A). In this matter, Charles Zogby's presence and apparent involvement in the campaign organization and on-going operation of the Coalition set up by the NVC indicates that he had access to the candidate's plans, projects, and needs in relation to the Presidential Committee's ethnic outreach. As discussed, Charles Zogby attended weekly strategy meetings and frequently consulted with Mark Holman, the paid campaign Deputy Director of

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the Coalitions Division. Charles Zogby also had contact with Ceci McInturff, the director of the NVC, and Leslie Goodman, the NVC press relations director. In addition, as part of his responsibilities, Zogby put together information for at least one press announcement and helped publish a weekly campaign newsletter. Thus, Charles Zogby was in direct contact with all levels of the campaign hierarchy and had access to information regarding the campaign's plans and goals. Cf. MUR 2277 (no direct contact with political committee was an important factor in finding no coordination). Accordingly, under Commission regulations the expenditures made by AAI, AARF and GAB were not independent and should be treated as in-kind contributions.⁵

Moreover, the evidence adduced during discovery suggests that Charles Zogby may have utilized his knowledge of the Presidential Committee's ethnic outreach efforts in connection with the AAI and AARF expenditures. Charles Zogby composed and distributed AARF financed monthly Election Reports containing information about Arab American Republican activities, at the same time he worked on the Coalition's weekly newsletter. In sum, Charles Zogby's assertion (Charles Zogby Transcript pg. 85) that the October 19, 1988 AARF mailing was neither authorized by, nor coordinated with the Presidential Committee is inconsistent with the preponderance of other available evidence.

5. Charles Zogby's asserted independence is further overcome by his acknowledged receipt of a \$150 reimbursement from the Presidential Committee. Under 11 C.F.R. § 109.1(b)(4)(i)(B) coordination may be presumed by showing that expenditures were made through any person who has received any form of reimbursement from the candidate's committee.

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Consequently, rather than being independent expenditures, it appears that the expenditures discussed above constituted coordinated in-kind contributions.

B. Corporate Contributions

The Act specifies that corporations are prohibited from making federal election contributions out of corporate treasury funds. 2 U.S.C. § 441b(a). A contribution or expenditure is defined to include "any direct or indirect payment distribution, loan, advance, deposit or gift of money or any services, or anything of value... to any candidate, campaign committee... in connection with" any federal election.

2 U.S.C. § 441b(b)(2). It is also unlawful for any officer or director to consent to a corporate contribution or expenditure in connection with a federal campaign. 2 U.S.C. §§ 441b(a). Further, a corporation may not serve as a conduit or intermediary to facilitate the making of contributions, such as by providing envelopes addressed to the candidate or committee. See AOs 1987-29, 1986-4, and 1982-2.

However, there are certain exemptions from Section 441b's broad prohibitions. Section 441b(b)(2)(A), for example, exempts a corporation's internal communications with members of its restricted class from the definition of contribution or expenditure.⁶ In addition, 11 C.F.R. § 114.9(a) enables

6. For purposes of Section 441b, the term "executive or administrative personnel" means individuals employed by a corporation who are paid on a salary basis, and who have policymaking, managerial, professional or supervisory responsibilities. 2 U.S.C. § 441b(b)(7), 11 C.F.R. § 114.1(c).

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employees or shareholders to make occasional, isolated or incidental use of corporate facilities for "individual volunteer activity," provided certain requirements are met. First, the use of corporate facilities must be by stockholders or employees of the corporation. Second, the use must be occasional, isolated or incidental. Third, the activity must be on a volunteer basis. In addition to these three requirements, the stockholder or employee using the corporate facilities is required to reimburse the corporation to the extent that the overhead or operating costs of the corporation are increased. See also 11 C.F.R. § 114.9(c) (allowing any person to use the facilities of a corporation to produce materials in connection with a Federal election, provided that person reimburses the corporation within a commercially reasonable time for the normal and usual charge for producing the materials in the commercial market).

It appears that AARF/AAI violated the statutory prohibition against corporate contributions on several grounds. For example, Charles Zogby was paid a salary by AAI during the time period in which he was working over 35 hours a week with the Presidential Committee. In addition, Charles Zogby used AARF/AAI resources to produce both the January solicitation letter and the October mailing. In both instances AAI/AARF facilities, computers, and mailing lists were essential to the ultimate mailing. These activities were coordinated through an agent of the campaign, and therefore must be treated as in-kind contributions. Given the utilization of corporate resources in

their production, it appears that they constitute prohibited corporate contributions.⁷

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The expenditures related to the AARF/AAI January, 1988 solicitation/advocacy letter do not appear to fall within the exemptions to the Section 441b prohibition. Commission regulations at 11 C.F.R. § 114.9 allow for the use of corporate facilities, but require reimbursement of the corporation within a commercially reasonable time in the amount of the normal and usual rental charge. 11 C.F.R. § 114.9(d). Here, however, there are indications that AARF/AAI utilized outside facilities in the production, distribution and collection of responses to the January, 1988 mailing. Certainly the procurement of a post office box specifically for the purpose of collecting contributions in response to the January, 1988 mailing cannot be characterized as use of pre-existing corporate facilities. See 11 C.F.R. § 114.9(d). In addition, according to a February 11, 1988 invoice forwarded by AARF to the Primary Committee, the January mailing consisted of 4,783 pieces being posted at \$.22 each, far larger than an 888 piece mailing undertaken by Charles Zogby in October of 1987 for which arrangements were made with an outside firm to reproduce, paste labels, and mail envelopes. Given that AARF has only one employee, it does not appear likely that the 4,783 January

7. It is also noted that the Arab American Republican Federation spent \$1,293.75 for "Ethnic Voters for Bush" campaign buttons for the Republican National Convention.

solicitation/advocacy letters would have been done "in-house."⁸

In light of the foregoing, there is reason to believe that Arab American Republican Federation violated 2 U.S.C. § 441b.

C. Other Violations

Section 441d of the Act mandates that all express political advocacy communications, or general public political advertising, must carry certain disclaimers. These disclaimers are required to state as follows:

(1) if paid for and authorized by a candidate, an authorized political committee of a candidate, or its agents, shall clearly state that the communication has been paid for by such authorized political committee, or

(2) if paid for by other persons but authorized by a candidate, an authorized political committee of a candidate, or its agents, shall clearly state that the communication is paid for by such other persons and authorized by such authorized political committee;

(3) if not authorized by a candidate, an authorized political committee of a candidate, or its agents, shall clearly state the name of the person who paid for the communication and state that the communication is not authorized by any candidate or candidate's committee.

The October 1988 AARF mailing was sent out on a combination of Arab American Republican Federation letterhead, Bush-Quayle '88 letterhead, as well as stationary denoted as coming from the

8. If Charles Zogby handled all of the preparations for the mailing himself his activities probably would not qualify as the "occasional, isolated, or incidental" use of corporate facilities by an employee within the meaning of Commission regulation 11 C.F.R. § 114.9(a).

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Arab American Supporters for George Bush. None of the pages comprising this October 1988 mailing displays a disclaimer. Likewise, AARF's January 1988 mailing was sent out on letterhead entitled Arab-Americans for George Bush, an apparently fictitious organization. These mailings, which expressly advocated the election of George Bush, failed to include an appropriate disclaimer. Thus, there is reason to believe that AARF violated 2 U.S.C. § 441d(a).

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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MUR 2767

INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS

TO: Arab-American Republican Federation
918 16th St., N.W., Suite 501
Washington, D.C. 20006

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In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

INSTRUCTIONS

In answering these interrogatories and requests for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in your possession, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from September 1, 1987 to November 1, 1988.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

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DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

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INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS

1. Describe the purpose(s) and goal(s) of the Arab American Republican Federation ("AARF") and detail the methods used to achieve them.
2. State whether it is the policy of AAI to accept financial support from corporate or labor organizations.
3. Identify any lists of names which were used for specific AARF mailings which advocated or supported the election or defeat of George Bush for president.
4. State whether any funds received in response to the January 4, 1988 letter attached hereto were placed in an AARF bank account. If so, provide all information pertinent to such deposits, including but not limited to:
 - a. the name of bank;
 - b. the account number
 - c. the contributors' name and date of original contribution;
 - d. the ultimate recipient of the funds and the date the funds were transferred to that recipient.
5. Identify all outside companies used to produce or distribute the January 4, 1988 letter attached hereto and provide all billing statements and photocopies of canceled checks for such services rendered.
6. Identify all contacts between AARF, or its employees, and the George Bush presidential campaign.
7. Produce all AARF '88 Election Reports with which Charles Zogby was involved in the production or distribution, and which have not been previously produced.

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Arab Americans for George Bush

January 4, 1987

Dear Fellow Arab American,

In 1988 Arab Americans face the important task of electing a leader who will ready this great nation to meet the challenges of tomorrow. Our community will be looking to a candidate with leadership and experience. We need a candidate who brings to the presidency the knowledge and capabilities to make the tough and balanced decisions that will allow us to respond to the needs of this country.

I believe that Vice President George Bush offers these unique qualities and that is why I am asking for your support to help make George Bush the next President of the United States.

I am convinced that a George Bush presidency would be one of leadership, vision and integrity.

The crucial issues that face this country in the years ahead, the issues that Arab Americans are most concerned with, are in the area of foreign policy. George Bush is alone among the candidates in his ability to deal with the complex and difficult international questions that we face. The Vice President's experience and personal involvement are vital assets in our working together to resolve these critical issues.

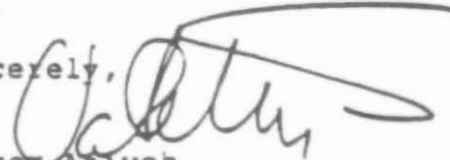
Governor John Sununu of New Hampshire, an Arab American and a National Co-Chair of the Bush campaign, has pledged to make this a winning campaign and to do everything to achieve that goal. I share with him the goal of electing George Bush and ask you to join with us today in this pledge.

Arab Americans for George Bush will not only be committed to electing our candidate as the next president, but we will work to bring Arab Americans into every level of the campaign process.

Please use the enclosed form to join me in this effort. Sign-up today to work with me to bring Arab Americans in at all levels of the process. Additionally, your contribution of \$1000, \$500, \$250 or \$100 will help bring the message of Arab Americans to the Bush campaign.

We have a great deal of work before us, but I am confident that together we can make a difference.

Sincerely,



Victor Atiyeh
Chairman

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Arab Americans for George Bush

YES! Governor Atiyeh, I want to join Arab Americans for George Bush. Please make me part of the effort to elect George Bush and bring Arab Americans into the campaign process.

Name _____

Occupation/
Employer _____

Address _____

Phone (day) _____ (eve) _____

* * *

I would like to sign-up to:

- _____ Work as a volunteer at the George Bush for President campaign office in my city.
- _____ Help raise an additional \$500 from family and friends.
- _____ Organize an Arab American support network for George Bush in my community.

/ * *

Also, Enclosed is my contribution to the Arab Americans for George Bush effort:*

☐ \$100 ☐ \$250 ☐ \$500 ☐ \$1000 ☐ \$ _____

* Note: Please make checks payable GEORGE BUSH FOR PRESIDENT.

Please return to:

Arab Americans for George Bush
P.O. Box 65153
Washington Square Station
Washington, DC 20035

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 27, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J.N. Parker, Esquire
1100 Connecticut Avenue, N.W.
Washington, D.C.
20036-4101

RE: MUR 2767
Greek Americans for Bush
William G. Chirgotis

Dear Mr. Parker:

On November 1, 1988, the Federal Election Commission notified your clients, the Greek Americans for Bush ("GAB") and William G. Chirgotis, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was enclosed with that notification.

Upon further review of the allegations contained in the complaint, information ascertained during the subsequent investigation, and information supplied by your clients, the Commission, on October 4, 1990, found that there is also reason to believe that the Greek Americans for Bush and its treasurer violated 2 U.S.C. §§ 441a(a)(1)(A) and 441d(a), provisions of the Act. Furthermore, on that same date the Commission found that there is reason to believe that William G. Chirgotis personally violated 2 U.S.C. §§ 441a(a)(1)(A) and 441d(a). The Factual and Legal Analysis, which formed a basis for the Commission's findings, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your clients. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Statements should be submitted under oath. All responses must be submitted to the General Counsel's Office within 15 days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your clients, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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MUR 2767
Richard Mayberry
page 2


If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 investigation to be made public.

If you have any questions, please contact Jim Brown, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lee Ann Elliott
Chairman

Enclosures
Factual and Legal Analysis

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

Greek Americans for Bush and
William Chirgotis, as chairman
c/o John N. Parker
1100 Connecticut Avenue, N.W.
Washington, D.C
20036-4101

MUR 2767

I. FACTUAL BACKGROUND

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The Bush-Quayle '88, Inc. Committee ("the Presidential Committee") consisted of eight or ten Divisions. This matter focuses on one of those internal campaign divisions, the National Voter Coalitions of Bush-Quayle '88 ("the NVC"). The Director of the NVC was Ceci Cole McInturff; Mark Holman was the Deputy Director. As full-time paid staffers, both McInturff and Holman worked out of the Washington D.C. Presidential Committee Headquarters. Both McInturff and Holman supervised "volunteers" who worked out of the Washington office in pursuit of the Presidential Committee's efforts to involve different coalitions in the Bush-Quayle campaign.

As part of the effort, ethnic volunteer leaders and steering committee members were chosen by Bush-Quayle '88 state campaign officials to lead Bush-Quayle campaign efforts at the state level. In addition to these local organizations, NVC also chose well-known individuals from distinct ethnic or nationality backgrounds to voluntarily mobilize their respective national communities on behalf of the Bush-Quayle Campaign and form organizations within the framework of what was called the

Coalition of American Nationalities ("the Coalition"). These individuals were appointed by the Bush-Quayle '88 campaign and accorded the honorary title of chairman of the various ethnic organizations for Bush-Quayle '88. Together, the 17 or 18 volunteer ethnic nationality groups actually constituted the Coalition. The Coalition of American Nationalities was advised and kept informed by four "volunteers" working out of the Washington D.C. campaign headquarters of the Presidential Committee. Each of these individuals was given the title "Director, Coalition of American Nationalities." The present matter involves one of the Coalitions members, the Greek Americans for Bush-Quayle '88 ("GAB")

The Presidential Committee appointed William G. Chirgotis as the Chairman of the Greek Americans for Bush-Quayle '88 Committee. During his deposition Chirgotis also referred to this group as the Greek Nationalities Group of the Coalition of American Nationalities. Once the Presidential Committee had named Chirgotis as chairman he proceeded to organize the Greek community in support of the Bush-Quayle candidacy. For example, Chirgotis sent out solicitations and used the funds received to place advertisements in Greek oriented newspapers. As set forth in greater detail below, it appears that Chirgotis relied heavily upon Charles Zogby for advice in organizing the Greek community behind Bush-Quayle.

Charles Zogby had connections with the political campaigns of George Bush beginning in 1984 when he worked as a volunteer for the Reagan-Bush '84 ethnic voters division an average of 40

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hours a week from August, 1984, until November, 1984. Charles Zogby's contact with the 1988 Presidential Committee dates at least to late 1987. During the 1988 campaign he was a non-salaried worker for the Presidential Committee and was given the title, "Director, Coalition of American Nationalities." He was apparently GAB's contact person at the Presidential Committee

Chirgotis testified that his primary contact with the Presidential Committee was Charles Zogby. Chirgotis Transcript at 15. In his position as chairman of Greek Americans for Bush-Quayle '88, Mr. Chirgotis requested Coalition money in order to place advocacy advertisements in Greek publications. According to Chirgotis testimony, as the primary GAB contact at the Presidential Committee, Charles Zogby most likely told Chirgotis that the Presidential Committee had no funds to place advertisements in Greek publications, but if Chirgotis wanted to raise funds for such ads he could do that. Id. at pp. 38-40. Zogby denies telling anyone that they could raise funds.

On October 12, 1988, in his position as Director, Coalition of American Nationalities, Charles Zogby sent some letterhead to William Chirgotis. See Chirgotis Deposition, FEC Exhibit 2. This letterhead displayed the heading "Bush Quayle 88 Coalition of American Nationalities" and listed William Chirgotis as the Chairman, as well as several other prominent Greek Americans as "Honorary Chairs," "Co-Chairs," and a "Vice Chair." Finally, the letterhead Charles Zogby sent contained a disclaimer along the bottom of the paper stating, "Paid for by Bush-Quayle 88."

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Chirgotis used this letterhead in a solicitation letter sent to approximately 70 or 80 individuals whose names he accumulated through friends and by word of mouth. Chirgotis Deposition at 19. Information utilized by Chirgotis in this solicitation came from materials sent out by the NVC. Id. at 22.¹

The initial costs associated with the preparation and distribution of this Greek Americans for Bush solicitation amounted to \$985, which was paid by Chirgotis himself. In addition, Chirgotis opened an account with \$1,000 of his own money in which to place future receipts. Id. at 29. In response to the solicitation Chirgotis received \$5,425 in additional contributions that were deposited into the account. These funds were then used to prepare and place advertisements in five Greek oriented publications. In most instances those advertisements carried the disclaimer, "Paid for by Greek Americans for Bush-Quayle," but in one instance the disclaimer states the following: "Paid for by Bush for President Committee."

The Presidential Committee maintains that its Coalition volunteers were encouraged to participate in activities such as writing Op-Ed pieces and Letters-To-The-Editor of local media,

1. Mr. Chirgotis states that he did not request letterhead, although there is some indication that letterhead used in the original Greek Americans for Bush solicitation would only have been provided if ordered. Chirgotis transcript at 25. The coalitions, according to the campaign, were comprised solely of volunteers, selected by state campaign officials and were different from the coalition leaders involved in the National Voter Coalition who were paid employees. Thus, this letterhead was supposedly intended to encourage others to volunteer for the campaign.

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but not to fundraise. According to Mark Holman, the Deputy Director of the NVC, the NVC was allotted a budget of \$10,000 to place advertisements in ethnic newspapers, but none were placed in Greek publications. In addition, the Presidential Committee acknowledges that it issued two press releases regarding the formation of Greek Americans for Bush-Quayle '88. The Presidential Committee asserts, however, that this organization had nothing to do with Greek Americans for George Bush which was simultaneously organized by the Presidential Committee's own appointed Chairman of the Greek Americans for Bush-Quayle '88.²

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The Presidential Committee also sent a memorandum dated October 12, 1988, to all National and State Coalition leaders. That memo from Ceci Cole McInturff, Director for NVC, states that all fundraising efforts undertaken by coalition members should be done in their individual capacities and not on behalf of the Presidential Committee. The memo states that any legal questions should be directed toward the Presidential Committee's General Counsel at a phone number given in the memo. Memorandum sent by McInturff to Coalition Leaders pg. 1-2. Chirgotis' recollection regarding receipt of this "do's and don'ts" memo is unclear. He testified that he could have received something similar to it, but maintains he never received anything that

2. Throughout his deposition Chirgotis does not make any apparent distinction between Greek Americans for George Bush ("GAB") and Greek Americans for Bush-Quayle '88. In fact, Chirgotis testified that he considered Greek Americans for Bush to be connected to the Presidential Committee. Chirgotis Transcript at pg. 66. As discussed herein, both names are alluded to in the same correspondence from Chirgotis.

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said he could not fundraise. Chirgotis Transcript at 43. In fact, Chirgotis emphatically testified that he was never told fundraising was forbidden and that he "went under the assumption that we were authorized to proceed to raise money to pay for the ads, and we went along with that assumption." Id. at 43. Chirgotis further testified that he felt the receipt of Bush-Quayle '88 disclaimer letterhead "authorized" him to raise funds. Id. at 37-38. Mr. Chirgotis does not remember receiving anything that said his activities were not authorized by the campaign until he got notice of the complaint filed by complainants. Id. at 60.

II. LEGAL ANALYSIS

A. Coordination

A major issue raised in this matter centers on whether the expenditures made by GAB to benefit the Presidential Committee qualify as independent expenditures under the Federal Election Campaign Act of 1971, as amended ("the Act"), and implementing Commission Regulations. If an expenditure does not qualify under the Commission's regulations as an independent expenditure, it is treated as an in-kind contribution to the candidate or candidate's authorized committee on whose behalf it is made. 11 C.F.R. § 109.1(c). Under the Presidential Election Campaign Fund Act ("the Fund Act"), organizations may make independent expenditures on behalf of a presidential candidate receiving public financing. 26 U.S.C. § 9001 et seq. However candidates receiving public funds under the Fund Act cannot accept any outside contributions. 26 U.S.C. § 9003(b)(2).

Section 431(17) of the Act defines "independent expenditure" as

[A]n 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 of, any candidate, or any authorized committee or agent of such candidate

Commission implementing regulations at Part 109 establish guidelines for determining whether an expenditure falls within this statutory definition. Section 109.1(b)(4)(i) clarifies the terms "cooperation" and "in consultation with" by defining them to mean "any arrangement, coordination, or direction by the candidate or his or her agent prior to the publication, distribution, display or broadcast of the communication." The regulation further states that an expenditure is presumed to be coordinated when it is

(A) Based on information about the candidate's 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; [or 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.

11 C.F.R. § 109.1(b)(4)(i)(A) & (B). Central to the inquiry of whether these presumptions of coordination apply is the

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issue of whether Charles Zogby was an agent of the Primary or Presidential Committees. Commission regulations define an agent as follows

[A]ny person who has actual oral or written authority, either express or implied, to make or to authorize the making of expenditures on behalf of a candidate, or means any person who has been placed in a position within the campaign organization where it would reasonably appear that in the ordinary course of campaign-related activities he or she may authorize expenditures. 11 C.F.R. § 109.1(b)(5) (emphasis added).

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The information disclosed through discovery reveals that Charles Zogby was an agent of the Presidential Committee and in that capacity coordinated the expenditures of GAB to the benefit of the Presidential Committee. First, Charles Zogby had all of the trappings of authority: he held the title of Director, Coalition of American Nationalities; used official Bush-Quayle business cards; had his own desk at the National Bush-Quayle '88 headquarters; and was listed in the campaign telephone directory.

Moreover, during his 35+ hour work week for the Presidential Committee, Zogby contacted individuals to see if they would become members of the newly formed ethnic coalitions. During the course of such conversations Zogby would state his name, identify that he was from the Bush campaign and that he served on the Presidential Committee's Coalition of American Nationalities. Charles Zogby also became one of the primary contacts with individuals volunteering for the ethnic coalition groups. He gave advice on how to mobilize the different ethnic

organizations and ordered ethnic/nationality stationary which he sent out to at least one of the ethnic organizations.

Charles Zogby's position within the campaign organization made it reasonable to assume that he had either express or implied authorization to make expenditures. William Chirgotis' testimony confirms that Charles Zogby in fact was perceived as a Presidential Committee campaign official. Certainly William Chirgotis felt that Charles Zogby had authority to make expenditures for advertisements in Greek publications because Chirgotis asked Charles Zogby to do just that. In short, the evidence on hand clearly establishes that Zogby was placed in a position within the campaign organization where it would reasonably appear that he could authorize expenditures, which is all that is required to establish agency under the Commission's Regulation. See 11 C.F.R. § 109.1(b)(5).

As noted earlier, coordination may be presumed where expenditures are made based on information about the candidate's plans, projects, or needs provided by an agent of the candidate's committee. See 11 C.F.R. § 109.1(b)(4)(i)(A). In this matter, Charles Zogby's presence and apparent involvement in the campaign organization and on-going operation of the Coalition set up by the NVC indicates that he had access to the candidate's plans, projects, and needs in relation to the Presidential Committee's ethnic outreach. Accordingly, under Commission regulations the expenditures made by GAB were not independent and should be treated as in-kind contributions.

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B. Excessive Contributions

The Act at Section 441a prohibits any person from making contributions to a given candidate in connection with a particular election, which in aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A). The facts here indicate that the Presidential Committee, via its agent, coordinated the expenditures of GAB with other campaign efforts directed toward ethnic groups, and thus GAB's expenditures on advertisements in the Greek oriented media constitute in-kind contributions under 11 C.F.R. §§ 109.1(b)(4)(i) and 109.1(c). As demonstrated above, it appears that Charles Zogby was an agent of the Presidential Committee under Commission regulations. William Chirgotis has testified that it was likely Charles Zogby who told Mr. Chirgotis that the Presidential Committee had no funds to place advertisements in Greek publications, but that Chirgotis should feel free to raise funds to place such ads. Shortly thereafter Charles Zogby sent Presidential Committee stationary to Mr. Chirgotis, which he used to raise \$5,425 for the placement of pro-Bush/Quayle advertisements in Greek publications. Thus, there is reason to believe that Greek Americans for Bush violated 2 U.S.C. § 441a(a)(1)(A) by expending greater than \$1,000 on advertisements advocating the election of George Bush. Also, there is reason to believe that William G. Chirgotis violated 2 U.S.C. § 441a(a)(1)(A) by contributing more than \$1,000 to GAB to facilitate the production and placement of GAB's advertisements.

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C. Other Violations

Section 441d of the Act mandates that all express political advocacy communications, or general public political advertising, must carry certain disclaimers. These disclaimers are required to state as follows:

(1) if paid for and authorized by a candidate, an authorized political committee of a candidate, or its agents, shall clearly state that the communication has been paid for by such authorized political committee, or

(2) if paid for by other persons but authorized by a candidate, an authorized political committee of a candidate, or its agents, shall clearly state that the communication is paid for by such other persons and authorized by such authorized political committee;

(3) if not authorized by a candidate, an authorized political committee of a candidate, or its agents, shall clearly state the name of the person who paid for the communication and state that the communication is not authorized by any candidate or candidate's committee.

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William Chirgotis failed to place the appropriate disclaimer on his original solicitation correspondence for GAB on the Bush-Quayle '88 Coalition of American Nationalities stationary sent to him by Charles Zogby. Because Chirgotis actually paid the original printing and distribution costs for this correspondence but failed to state so, there is reason to believe that William G. Chirgotis also violated 2 U.S.C. 441d(a)(3).

The advertisements placed by Greek Americans for Bush also

failed to meet the disclaimer requirements of 2 U.S.C. § 441d(a)(3) in that they fail to denote whether or not they were authorized by the candidate, while one indicates that it was paid for by the Presidential Committee. Therefore, there is reason to believe that Greek Americans for Bush and its treasurer, violated 2 U.S.C. § 441d(a)

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OGC 8780

LAW OFFICE OF
RICHARD MAYBERRY & ASSOCIATES
FIFTH FLOOR
888 16TH STREET, N.W.
WASHINGTON, D.C. 20006
(202) 785-6677

November 29, 1990

BY HAND

Jim Brown, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, NW, Sixth Floor
Washington, DC 20463

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL
90 NOV 29 AM 3:23

Re: MUR 2767, Arab-American Institute

Dear Mr. Brown:

On behalf of my client, the Arab-American Institute, I request a twenty-day extension of time to respond to the Commission's reason to believe finding and interrogatories and document requests. The discovery is extensive and will require the additional time to answer and produce the documents. Moreover, we are entering the holiday season and those responding will be on leave for part of the period. Also, the current work flow makes it impossible to have the response prepared within fifteen days. Therefore, we request the additional twenty-day extension to respond. Thank you for your consideration of this request.

Very truly yours,

Richard Mayberry

Richard Mayberry

RM:cgk

cc: Mrs. Helen Samhan

93043501365



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 4, 1990

Richard Mayberry
888 16th Street, N.W.
Washington, D.C.
20006

RE: MUR 2767
-Arab-American Institute
-Arab-American
Republican Federation

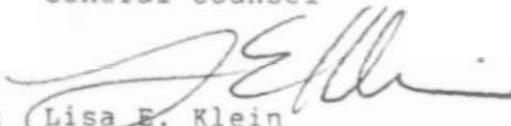
Dear Mr. Mayberry:

This is in response to your letter dated November 29, 1990, which we received on November 29, 1990, requesting an extension of 20 days to respond to the Commission's reason to believe findings and discovery requests in the above cited matter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on January 3, 1991.

If you have any questions, please contact Jim Brown, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lisa E. Klein
Assistant General Counsel

93043501366

8851
LAW OFFICE OF
RICHARD MAYBERRY & ASSOCIATES
FIFTH FLOOR
888 16TH STREET, N.W.
WASHINGTON, D.C. 20006
(202) 785-6677

December 4, 1990

BY HAND

93043501367
Jim Brown, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, NW, Sixth Floor
Washington, DC 20463

Re: MUR 2767, Arab-American Republican Federation

Dear Mr. Brown:

I request a twenty-day extension in which to respond to the Commission's brief, interrogatories and production of documents. The staff of the Arab American Institute are busy preparing their own discovery responses. Additional time is needed to respond to the Republican Federation's discovery. The present work-load makes it impossible to respond within fifteen days. Combined with leave of personnel for the holidays, an additional twenty days of time are required. Thank you for your consideration of this request.

Very truly yours,

Richard Mayberry

Richard Mayberry

RM:cgk

cc: Mrs. Helen Samhan

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF ATTORNEY GENERAL
90 DEC -4 PM 12:20



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 6, 1990

Richard Mayberry
888 16th Street, N.W.
Washington, D.C.
20006

RE: MUR 2767
-Arab-American
Republican Federation

Dear Mr. Mayberry:

This is in response to your letter dated December 4, 1990, which we received on December 4, 1990, requesting an extension of 20 days to respond to the Commission's reason to believe findings and discovery requests in the above cited matter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on January 3, 1991.

If you have any questions, please contact Jim Brown, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lisa E. Klein
Assistant General Counsel

93043501368

OGC 8871

1100 CONNECTICUT AVENUE N.W. WASHINGTON, D.C. 20036

JOHN NICHOLAS PARKER

December 6, 1990

Mr. Jim Brown
Federal Election Commission
999 E Street, N.W.
Room 657
Washington, D.C. 20463

90 DEC -7 AM 8:32

FEDERAL ELECTION COMMISSION

Re: MUR 2767
Greek Americans for Bush
William G. Chirgotis

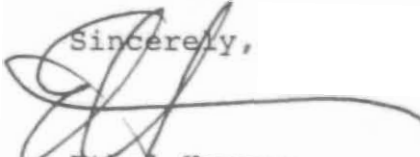
Dear Mr. Brown:

John N. Parker is out of the country and says he does not expect to be back in time for the deadline for the filing of the above-named complaint. He asked that I write to you and request an extension.

When we spoke on the phone you asked me to mention that the complaint letter dated November 27, 1990 and marked certified mail was only stamped into our office on December 4, 1990. It was not sent certified but only regular mail. I enclose a copy of the green card which was taped to the back of the envelope. As you can see, there is no certified number assigned to the card. No signature was obtained.

If I can be of any further assistance, please let me know. I can be reached at 862-1336.

Sincerely,



Ethel Hammer
Assistant

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9 3 0 4 3 5 0 1 3 7 0

<p>● SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4. Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.</p> <p>1. <input type="checkbox"/> Show to whom delivered, date, and addressee's address. 2. <input type="checkbox"/> Restricted Delivery.</p>	
<p>3. Article Addressed to:</p> <p>J. N. Parker, Esquire 1100 Connecticut Ave., N.W. Washington, D.C. 20036-4101</p>	<p>4. Article Number</p> <hr/> <p>Type of Service:</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail</p> <p>Always obtain signature of addressee or agent and DATE DELIVERED.</p>
<p>5. Signature — Addressee</p> <p>X</p>	<p>8. Addressee's Address (ONLY if requested and fee paid)</p>
<p>6. Signature — Agent</p> <p>X</p>	
<p>7. Date of Delivery</p>	



Arab American Institute

CGC 8935
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 DEC 11 AM 10:46

December 7, 1990

BY MESSENGER

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2767

Dear Madam or Sir:

This is to inform you that the Arab American Institute, Inc. hereby designates Edward S. Knight and William J. Farah of the law firm Akin, Gump, Strauss, Hauer & Feld as counsel in the above-captioned matter and authorizes them to receive any notification and other communications from the Commission and to act on its behalf before the Commission.

Counsel's address and telephone number is as follows:

1333 New Hampshire Avenue, N.W.
Suite 400
Washington, D.C. 20036
202/887-4000

Sincerely,

James J. Zogby
Executive Director

RECEIVED
FEDERAL ELECTION COMMISSION
90 DEC 11 PM 3:43

93043501371

060 830

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

December 11, 1990

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

ATTN: Jim Brown, Esq.

Re: MUR 2767 (Bush-Quayle 88, Inc. and
J. Stanley Huckaby, as Treasurer)

Dear Mr. Noble:

I am in receipt of your letter of November 27, 1990, enclosing a second set of interrogatories in the above-captioned matter. A response to these interrogatories is currently due on December 18, 1990.

The Committee is now searching its files for the information requested in your interrogatories. Unfortunately, in order to respond to the interrogatories and request for documents, we will need to request an extension of time. Our client last dealt with this matter some 16 months ago, and it will take some time to obtain and review records from storage, especially in light of the Holiday Season. Thus, we respectfully request a 30-day extension of time to and including January 17, 1991, within which to respond. This requested extension will not prejudice the Matter in any way.

Your favorable consideration of this request will be appreciated.

Sincerely,

Jan Baran /H/L
Jan Witold Baran

rpb

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 DEC 11 PM 1:50

93043501372

06C 8958

FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION

AKIN, GUMP, STRAUSS, HAUER & FELD
90 DEC 11 PM 3:33

ATTORNEYS AT LAW

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

1333 NEW HAMPSHIRE AVENUE, N.W.
SUITE 400

WASHINGTON, D.C. 20036

(202) 887-4000

FAX (202) 887-4288

4135

WRITER'S DIRECT DIAL NUMBER (202) 887-

4100 FIRST CITY CENTER
1700 PACIFIC AVENUE
DALLAS, TEXAS 75201-4618
(214) 969-2800

1500 INTERFIRST PLAZA
300 CONVENT STREET
SAN ANTONIO, TEXAS 78205
(512) 270-0800

2100 ONE CONGRESS PLAZA
111 CONGRESS AVENUE
AUSTIN, TEXAS 78701
(512) 499-6200

3200 REPUBLICBANK CENTER
700 LOUISIANA STREET
HOUSTON, TEXAS 77002
(713) 221-0101

December 11, 1990

BY MESSENGER

Lee Ann Elliott, Chairman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Mur 2767

Dear Chairman Elliott:

This letter is to request that the Federal Election Commission ("FEC") grant an extension of time for the Arab American Institute, Inc. ("AAI") to demonstrate that no action should be taken against it in the above-captioned matter.

AAI was notified by letter of November 27, 1990, of the Commission's belief that AAI had violated the law. AAI began to search for representation and contacted counsel to arrange to meet to discuss representation. On December 6, counsel was retained. A letter designating representation was filed with the Commission this morning.

The FEC's Office of General Counsel ("OGC") granted AAI's request through other counsel for an extension of time to January 3, 1991 (we understand this to be the maximum extension OGC is authorized to grant). For the reasons set forth below, however, we believe additional time is necessary in order to prepare an adequate response to the several allegations made against AAI by the FEC.

New counsel will not have the full benefit of the previously granted extension. Moreover, the Commission, in its "Factual and Legal Analysis" for MUR 2767 states that "[t]his matter involves a complex factual situation related to a number of individuals and organizations ..." In view of these complexities and the numerous allegations that the Commission is levelling in this matter, counsel will require substantial time to review the record, investigate the allegations and prepare an adequate response.

90 DEC 12 PM 2:39

90 DEC 12 PM 4:37

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

93043501373

AKIN, GUMP, STRAUSS, HAUER & FELD

RECEIVED
FEDERAL BUREAU OF INVESTIGATION
ADMINISTRATIVE DIVISION
90 DEC 11 PM 3:33

Lee Ann Elliott
December 11, 1990
Page Two

With religious holidays upon us, the availability of individuals with information relevant to this matter and the time of counsel will be limited. We urge the Commission, therefore, to grant an extension of time for AAI to respond to January 14, 1990.

Sincerely,

Edward S. Knight

Edward S. Knight
William J. Farah

cc: Jim Brown, Esq.

93043501374



Arab American Institute

RECEIVED

90 DEC 11 AM 10:45

December 7, 1990

BY MESSENGER

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2767

Dear Madam or Sir:

This is to inform you that the Arab American Institute, Inc. hereby designates Edward S. Knight and William J. Farah of the law firm Akin, Gump, Strauss, Hauer & Feld as counsel in the above-captioned matter and authorizes them to receive any notification and other communications from the Commission and to act on its behalf before the Commission.

Counsel's address and telephone number is as follows:

1333 New Hampshire Avenue, N.W.
Suite 400
Washington, D.C. 20036
202/887-4000

Sincerely,

A handwritten signature in dark ink, appearing to read 'James J. Zogby', is written over a light-colored rectangular background.

James J. Zogby
Executive Director

93043501375



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 10, 1990

John N. Parker, Esq.
c/o Ethel Hammer
1100 Connecticut Avenue, N.W.
Washington, D.C. 20036

RE: MUR 2767
-Greek Americans for Bush
-William G. Chirgotis

Dear Mr. Parker:

This is in response to your assistant's request of December 6, 1990, which we received on December 7, 1990, for an extension in responding to the Commission findings in the above matter. It appears that there was some irregularity in the mailing of the Commission's certified notice letter, and that your office received the letter outlining the Commission's findings on December 4, 1990. After considering the circumstances presented by your assistant over the phone and in her letter, I have granted an extension. Accordingly, your response is due by the close of business on January 8, 1991.

If you have any questions, please contact Jim Brown, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lisa E. Klein
Assistant General Counsel

93043501376

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

December 11, 1990

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

ATTN: Jim Brown, Esq.

Re: MUR 2767 (Bush-Quayle 88, Inc. and
J. Stanley Huckaby, as Treasurer)

Dear Mr. Noble:

I am in receipt of your letter of November 27, 1990, enclosing a second set of interrogatories in the above-captioned matter. A response to these interrogatories is currently due on December 18, 1990.

The Committee is now searching its files for the information requested in your interrogatories. Unfortunately, in order to respond to the interrogatories and request for documents, we will need to request an extension of time. Our client last dealt with this matter some 16 months ago, and it will take some time to obtain and review records from storage, especially in light of the Holiday Season. Thus, we respectfully request a 30-day extension of time to and including January 17, 1991, within which to respond. This requested extension will not prejudice the Matter in any way.

Your favorable consideration of this request will be appreciated.

Sincerely,

Jan Baran /ctz
Jan Witold Baran

rpb

90 DEC 11 PM 1:50

93043501377



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 14, 1990

Jan W. Baran and Carol A. Laham
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 2767
-Bush-Quayle '88, Inc.
and J. Stanley Huckaby
as treasurer

Dear Mr. Baran and Ms. Laham:

This is in response to your letter dated December 11, 1990, which we received on December 11, 1990, requesting an extension of 30 days to respond to the Commission's interrogatories in the above-captioned matter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on January 17, 1991.

If you have any questions, please contact Jim Brown, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel


BY: Lisa E. Klein
Assistant General Counsel

93043501378

06C 9065

LAW OFFICE OF
RICHARD MAYBERRY & ASSOCIATES
FIFTH FLOOR
888 16TH STREET, N.W.
WASHINGTON, D.C. 20006
(202) 785-6677

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 DEC 20 AM 11:36

December 19, 1990

The Honorable Lee Ann Elliott, Chairman
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: MUR 2767, Arab American Republican Federation

Dear Chairman Elliott:

By letter of November 27, 1990, the Arab American Republican Federation ("AARF") was informed by the Federal Election Commission ("FEC" or "Commission") that it had found reason to believe that AARF had violated various provisions of the Federal Election Campaign Act ("Act"). This finding comes subsequent to the Commission's finding of reason to believe last year that AARF had violated certain other provisions of the Act. In its letter of November 27, the Commission also served AARF with several interrogatories and requested the production of certain documents.

We transmit herewith our response to the Commission's interrogatories and its request for documents. In addition, we would like to take this opportunity to demonstrate to the Commission why no further action in this matter is necessary or appropriate.

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The Honorable Lee Ann Elliott
December 19, 1990
Page 2

Taken together, the FEC Office of General Counsel's ("OGC") November 27, 1990 and June 1, 1989 "Factual and Legal Analyses" allege that AARF and the Arab American Institute (AAI) are inextricably linked and that AARF is the political arm of AAI and may have functioned as its separate segregated fund ("SSF"). See MUR 2767, FEC, OGC Factual and Legal Analysis, p. 4 (Nov. 27, 1990). In addition, with respect to AARF,¹ the OGC report alleges that Charles Zogby, an employee of AAI and a volunteer for AARF, on two occasions (January 4, 1988 and October 19, 1988) may have coordinated expenditures by AARF with President Bush's presidential primary committee and Bush-Quayle '88, Inc. Committee ("Bush-Quayle '88"). Id. at 16-18. The OGC report further states that the mailings for which these coordinated expenditures were made failed to display the requisite disclaimers. Id. at 18-19. Finally, based on these activities, the OGC's June 1, 1989 report opines that AARF should have registered with the Commission as a political committee. See MUR 2767, FEC OGC Factual and Legal Analysis, p. 2 (June 1, 1989). Our response to each of these allegations is set forth below.

¹ OGC also alleges that AAI may have made an impermissible in-kind contribution to Bush-Quayle '88 Committee, Inc., in paying the salary of Charles Zogby, who was a volunteer for Bush-Quayle during the months of July, August, September and October 1990. AARF is not qualified to address this issue.

The Honorable Lee Ann Elliott
December 19, 1990
Page 3

1. AARF is a separate, distinct entity from the Arab American Institute

Contrary to the OGC's belief that AARF and AAI are extricably linked, AARF is a separate, distinct and independent entity from AAI for purposes of the Federal election laws.

First, structurally the two entities are distinct. AARF is an unincorporated association, while AAI is incorporated as a not-for-profit corporation under §501 (c)(4) of the Internal Revenue Code. AARF and AAI are controlled by different individuals. In addition, AARF and AAI maintain separate bank accounts and keep separate records, and AARF is responsible for its own operational costs.

Second, AARF and AAI are separately controlled. AARF is chaired by Nadar Sayegh and AAI is headed by Dr. James Zogby, who holds no position with AARF.

Third, the OGC report erroneously concludes that the AAI and AARF "[a]pparently . . . have virtually indistinguishable goals." MUR 2767, FEC OGC Factual and Legal Analysis, p. 3 (Nov. 27, 1990). AAI is an educational and training institute, providing information and training to Americans of Arab descent to promote participation in the American political process. AAI's goals include increased Arab American voter registration and involvement at the Federal, state and local levels. AAI also provides leadership training in campaign/

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The Honorable Lee Ann Elliott
December 19, 1990
Page 4

election skills, understanding local government, and developing political coalitions. Finally, AAI provides policy research and information on issues of concern to Arab Americans.

Quite distinct from AAI, AARF is an association of local Arab American Republican clubs. The purpose of AARF is to represent on a national level the involvement and concerns of these clubs and to act as their liaison to the National Republican Party. See AARF Response to FEC Interrogatory #1 (attached).

Fourth, although AAI and AARF operate out of the same offices, AARF rents the space and pays its share for use of AAI facilities. See AAI Annual Billing for Expenses and Services rendered to AARF (in attached production of documents). Accordingly, AARF maintains its independence from AAI and pays its own way. It is a subtenant of the AAI office suite and purchases at an arm's length the use of services of AAI.

Given the separate control over the two entities, their separate record-keeping and bank accounts, and their distinct purposes and goals, AAI and AARF should not be viewed by the Commission as inextricably linked.

2. AARF is not the separate, segregated fund of AAI

AARF is not the separate, segregated fund of AAI. First, AAI is separate from, and not connected to, AAI. See supra. Second, AARF's goal is to represent local Arab American clubs and to act as their liaison to the National Republican Party. It is not AARF's purpose to influence elections. The activity subject of this MUR is isolated, inadvertent and not programmatic for AARF.

3. The January 4, 1988 and October 19, 1988 mailings involved independent expenditures

The January 4, 1988 and October 19, 1988 mailings were independent expenditures and were not coordinated with Bush-Quayle '88. Charles Zogby was not in a position to authorize or expend funds on behalf of Bush-Quayle. Indeed, at the time of the January 4, 1988 mailing, Charles Zogby had no relationship with Bush-Quayle '88 or the Bush primary presidential committee.

The OGC report of November 27, 1990 argues that, as a "director" of the Coalition of American Nationalities ("Coalition") for Bush-Quayle '88, Charles Zogby was an agent of the Bush-Quayle '88 campaign committee. The OGC reaches this conclusion based on the belief that "Charles Zogby was in direct contact with all levels of the campaign hierarchy and had access to information regarding the campaign's plans and goals." See FEC OGC's Factual and Legal Analysis, p. 14 (Nov. 27, 1990). This was simply not the case.

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The Honorable Lee Ann Elliott
December 19, 1990
Page 6

As a volunteer for Bush-Quayle from July 1988 to October 1988, Charles Zogby's principal duty was to prepare a newsletter for the campaign to send to Coalition members to inform them of ethnic events involving then-Vice-President George Bush. All of the information contained in the newsletter came from "common knowledge." See, e.g., Deposition of Charles Zogby, p. 57-59 (Aug. 9, 1989). Charles Zogby had no access to, did not participate in any discussions concerning, and did not come by, any information with regard to Bush-Quayle '88 campaign strategy.

With respect to the title "director", the Commission should be aware that presidential committees tend to give virtually all volunteers a title and business cards. Indeed, among the Coalition there were several chairs, honorary chairs, members and directors. Moreover, it was clearly established throughout his deposition of August 9, 1989, that Charles Zogby had no authority to disburse funds or incur expenses on behalf of the campaign.

The OGC report notes a single disbursement to Charles Zogby from Bush-Quayle '88 of \$150 for travel expenses as evidence of his agency relationship to the campaign committee. Charles Zogby, along with numerous other volunteers, was given a lump sum payment of \$150 to cover his subway fare from the time he was working for the campaign. Other than this single \$150 payment, Charles

Zogby did not receive any money from the campaign, nor did he have authority to spend campaign funds. To establish an agency relationship pursuant to 11 C.F.R. §109.1(b)(4)(i) based solely on such a single payment is inconsistent with the spirit of that rule and clearly inconsistent with its intent.

In sum, Charles Zogby was not an agent or officer of Bush-Quayle '88, and any expenditures he and/or AARF may be responsible for were in no way coordinated with Bush-Quayle '88. Thus, the payments for the January 4, and October 19, 1988, mailings were inadvertent independent expenditures.

a. The January 4, 1988 mailing

The January 4, 1988 mailing was paid for initially with money raised by Charles Zogby. The January 4 solicitation letter was sent on letterhead entitled "Arab Americans for George Bush" and asked that any contribution checks be made payable to "George Bush for President" (the presidential primary committee). All of the checks subsequently were turned over to the Bush presidential primary committee. The total cost for that mailing was \$1,988.26. See AARF Response to FEC Interrogatory No. 4, p. 4 (June 28, 1989). Upon learning of the mailing, Bush-Quayle '88 reimbursed AARF for the cost of the January 4, 1988 mailing. Id.

93043501385

The Honorable Lee Ann Elliott
December 19, 1990
Page 8

Charles Zogby acted on his own in undertaking the solicitation of January 4. His use of privately raised funds commingled with AARF funds to pay for the mailing, however, was inappropriate. Notwithstanding, a self-remedy already has been imposed in this case. Bush-Quayle '88 reimbursed AARF for the cost of the January 4 mailing, and all of the checks collected by Charles Zogby were turned over to the campaign. Therefore, the incident, to the maximum extent possible, has been remedied. To impose further penalties on AARF for its inadvertent involvement in this activity is unnecessary and would penalize an act of self-enforcement.

b. The October 19, 1988 mailing

The October 19, 1988 mailing involved an isolated occurrence of express advocacy by AARF. In fact, most of the message of this letter simply urges Arab Americans to become politically active. The actual text of the letter from AARF advocating George Bush for President is limited to a single sentence. We recognize, of course, that the referenced letter therein from Congressman Paul Findley includes several passages advocating George Bush for President. But the nature of AARF (an unincorporated, voluntary association of ethnic clubs) makes infeasible the careful review of all mailing literature by outside counsel as is enjoyed by large corporations, trade associations and other well-financed

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The Honorable Lee Ann Elliott
December 19, 1990
Page 9

institutions. Furthermore, the cost of the October 19, 1988, mailing was relatively de minimis -- \$537.52. See AARF Response to FEC Interrogatory No. 4, p. 4 (June 28, 1989).

In view of the isolated, incidental and inadvertent nature of this expenditure, the nature of AARF (i.e., limited resources), and the de minimis amount involved, the Commission should impose no penalty in this matter. In addition, given the ethnic-based composition of AARF (as opposed to a business interest) and its laudable goals (representing ethnic clubs before the National Republican Party), the Commission should exercise additional leniency in this case. We therefore request pre-probable cause conciliation.

Very truly yours,

Richard Mayberry

Richard Mayberry

RM:cgk

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 DEC 20 AM 11:36

In The Matter of)

Arab-American Republican Federation.)

MUR No. 2767

RESPONSE TO FEDERAL ELECTION COMMISSION INTERROGATORIES

Charles Zogby, former National Secretary of the Arab-American Republican Federation ("Federation" or "AARF"), responds to the Federal Election Commission's Interrogatories as follows:

Question 1.

The purpose of the Arab-American Republican Federation is to represent on a national level the involvement and concerns of local Arab-American Republican clubs and activists and to encourage participation in the Republican Party. AARF served as the administrating body for its member clubs and sent out occasional mailings on news of the Federation. AARF also provided some logistical support to clubs for local activities and events. AARF also served as a liaison to the national Republican party on behalf of its member clubs.

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Question 2.

This is an issue best addressed by AAI. AARF is not qualified to comment on AAI's policies.

Question 3.

The AARF mailing of October 1988 utilized the Federation's list of members and supporters as well as the list of Arab-Americans who supported the Reagan-Bush campaign in 1984.

Question 4.

No funds from the January 4, 1988 mailing were placed in an AARF bank account.

Question 5.

The mailing in question was printed and mailed by International Graphics Printing Services of Brentwood, Maryland; labels were provided by MacSystems of Beltsville, Maryland. Copies of invoices and cancelled checks are attached.

Question 6.

Contacts between AARF and the George Bush campaign consisted of discussion of the January 1988 mailing for the Arab-Americans for George Bush; and the volunteer services of AARF national secretary Charles Zogby in ethnic outreach for the Bush-Quayle campaign during the fall of 1988.

Question 7.

AARF Election Reports nos. 1-8 (Nov. '87-June '88) are attached.

Respectfully submitted,

Date: December 19, 1990


Charles B. Ziegler

93043501391

INTERNATIONAL GRAPHICS

INVOICE



NO. 10316

DATE 1/7/88

4411 FORTY-FIRST STREET
BENTWOOD, MD. 20722
PHONE: (301) 779-7774

"Arab-Americans for George Bush" % ANRF
Arab-American Institute
918 Sixteenth St. NW, Suite 501
Washington, DC 20006

SOLD
TO

OUR ORDER NO.	YOUR ORDER NO.	DATE	TERMS	SHIPPED VIA	Ppd. or Coll.
11334	C. Zogby	12/20/87	net 20 days	P.O. / our truck	
QUANTITY	DESCRIPTION			PRICE	AMOUNT
5000	Letterheads - Arab-Americans for G. Bush Letter printed on letterhead				175.00
5000	#9 Envelopes				125.00
5000	#10 Envelopes				125.00
5000	Second page letter				125.00
	Insert three items, affix labels, stamp and mail				200.00
	pd 1.25.88 #1013 702.26				
	SALES TAX				

PLEASE RETURN THE YELLOW COPY
WITH YOUR PAYMENT.

TOTAL \$750.00

(R) (47.74)
702.26

credit for postage

ANRF
Question 5.

9 3 0 4 3 5 0 1 3 9 3
INTERNATIONAL GRAPHICS

INVOICE



NO 10362

DATE 1/15/88

4411 FORTY-FIRST STREET
BENTWOOD, MD. 20722
PHONE: (301) 779-7774

SOLD TO ☐ Arab Americans for George Bush % AARF
Arab-American Institute
918 16th St. NW, Suite 501
Washington, DC 20006

OUR ORDER NO.	YOUR ORDER NO.	DATE	TERMS	SHIPPED VIA	Ppd. or Coll.	
11440	C. Zogby	1/12/88	net 20 days	our truck		
QUANTITY	DESCRIPTION				PRICE	AMOUNT
500	Letterheads - Arab Americans for Bush					60.00
500	#10 Envelopes					
				<input type="checkbox"/> SALES TAX		

PLEASE RETURN THE YELLOW COPY
WITH YOUR PAYMENT

TOTAL \$60.00

MAC SYSTEM
P.O. Box 957
BELTSVILLE, MD 20705

invoice

(301) 937-0090

Arab-American Institute
Attn: Accounts Payable
918 16th Street NW
Suite 501
Washington DC 20006

SALESPERSON Invoice #41261 DATE OF INVOICE October 28, 198

SHIP TO

* 2% 10 days-Net 30 days

ACCOUNT NO.	DATE SHIPPED	SHIPPED VIA	COL P.P.	F.O.B. POINT	TERMS	YOUR ORDER NUMBER
LEB					*	T. Price

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	Select and print cheshire labels (LSL - 1,639; LRU, LRR, LRD - 3,336) and deliver.		172

See Invoice *57.50*
AA's for Bush
% AARF *\$115.00*

TOTAL	172
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ORIGINAL

43501394


9

93043501395

Washington Square Station

153

Always show your P.O. Box No. and ZIP Code in your return address 20035

Received Post Office Box/Caller Service Fees From: (Name of Customer) <u>Charles Zagly</u>		Amount <u>\$11.00</u>
<u>Arab American for Human Rights</u>		(Dating Stamp)
Box Number <u>65153</u>	<input checked="" type="checkbox"/> For one semiannual payment period <input type="checkbox"/> For Annual payment period <input type="checkbox"/> Reserved Number Fee Ending (Date) <u>6/30/88</u>	
Postmaster By <u>[Signature]</u>		

PS Form 1538
Feb. 1984

RECEIPT FOR POST OFFICE BOX/CALLER SERVICE FEES

U.S. Government Printing Office: 1984-755-427

Original

ARAB AMERICAN REPUBLICAN FEDERATION
918 - 15TH ST., N.W., SUITE 501
WASHINGTON, D.C. 20006

1013

15-55/540

PAY
TO THE
ORDER OF

January 25 1988

International Graphics

\$ 702.26

Seven hundred and two doll

26 / 100 DOLLARS

AMERICAN SECURITY BANK, N.A.
City Office
192 K Street, N.W.
Washington, D.C. 20006

FOR

⑈001013⑈ ⑆054000551⑆ 13-865 61 313⑈ ⑈0000070226⑈

ARAB AMERICAN REPUBLICAN FEDERATION
918 - 15TH ST., N.W., SUITE 501
WASHINGTON, D.C. 20006

1020

15-55/540

PAY
TO THE
ORDER OF

June 3 1988

International Graphics

\$ 60.00

Sixty dollars

60 / 100 DOLLARS

AMERICAN SECURITY BANK, N.A.
City Office
192 K Street, N.W.
Washington, D.C. 20006

FOR

⑈001020⑈ ⑆054000551⑆ 13-865 61 313⑈ ⑈0000006000⑈

ARAB AMERICAN REPUBLICAN FEDERATION
918 - 15TH ST., N.W., SUITE 501
WASHINGTON, D.C. 20006

1012

15-55/540

PAY
TO THE
ORDER OF

January 4 1988

International Graphics

\$ 1100.00

One thousand-one hundred doll

00 / 100 DOLLARS

AMERICAN SECURITY BANK, N.A.
City Office
192 K Street, N.W.
Washington, D.C. 20006

FOR

postage ck 7190 (see)

⑈001012⑈ ⑆054000551⑆ 13-865 61 313⑈ ⑈0000110000⑈

ARAB AMERICAN REPUBLICAN FEDERATION

918 - 16TH ST., N.W., SUITE 501

WASHINGTON, D.C. 20006

1009

November 24 1987

15-55/540

PAY
TO THE
ORDER OF

MAC Systems

\$ 115.00

One hundred fifteen dollars

115/100 DOLLARS



AMERICAN SECURITY BANK, N.A.

City Office
1802 K Street, N.W.
Washington, D.C. 20006

FOR

Inv. # 41261

⑈001009⑈-⑈05400055⑈13⑈865 61 313⑈ ⑈000000⑈1500⑈

ARAB AMERICAN REPUBLICAN FEDERATION

918 - 16TH ST., N.W., SUITE 501

WASHINGTON, D.C. 20006

429-9210(0)

1010

December 7 1987

15-55/540

PAY
TO THE
ORDER OF

U.S. Postmaster

\$ 11.00

Eleven dollars

11/100 DOLLARS



AMERICAN SECURITY BANK, N.A.

City Office
1802 K Street, N.W.
Washington, D.C. 20006

FOR

⑈001010⑈-⑈05400055⑈13⑈865 61 313⑈ ⑈000000⑈1100⑈

AAKF
Question 7.

Arab American
Republican
Federation



ARF June Election Report
Sent to ARF key list
6/22/88

129

Election '88 Report
June 1988

As the primary season gives way to the general election, efforts that began in January 1988 to organize the Arab American community around the Bush for President campaign are now moving into full swing. Our focus this month is on a central priority of Arab American Republican work through November -- capitalizing on the opportunities afforded by the presidential campaign to strengthen and expand the Arab American Republican club network and Arab American access and visibility in the Republican Party.

[1] Enclosed you will find a "Proposal for Arab American Republican Activity in the 1988 Elections". This proposal outlines steps essential to constructing an organized, nationwide network charged with mobilizing the Arab American community in support of George Bush.

a) A Brief Overview of the Bush Campaign's Program

The ethnic voter division of the Bush campaign will operate in much the same way as it did in the Reagan-Bush '84 campaign. The centerpiece of the division's efforts will be the declaration of support program, whereby Arab Americans declare their support for George Bush. The goal is to register as many community members as possible. In this same program in 1984 Arab Americans placed first among 42 nationality groups in registering support for the Reagan-Bush ticket. The Federation hopes to duplicate this result in 1988 -- one that can only be achieved with the active participation of the Arab American Republican club networks in the local communities.

The Republican Federation has also lent its assistance to the campaign's voter division to set up an "Arab Americans for George Bush" national leadership committee. The structure of this committee will be similar to the one laid out in Step #2 of the enclosed proposal. The Federation will pass on more detailed information on this committee as soon its available.

b. Arab American Efforts Beyond the Campaign's Program

On a substantive level, this proposal goes beyond the campaign program of simply registering as many individuals as possible. Specifically, the proposal is calculated to translate community efforts on behalf of Bush into political gains at the local level, by involving Arab Americans, through the Republican

clubs, directly into the local campaign and Party. Our goal is again -- to reinforce the already existing Republican clubs, to establish new clubs and expand our Arab American Republican network so that beyond November the Federation has in place a permanent base for future political action.

Arab Americans efforts on behalf of the Bush campaign, on a local level offers our community the opportunity:

- * of greater access to campaign and party leadership;
- * to establish our credentials as an organized constituency;
- * to gain hands-on campaign experience; and
- * to play leadership roles within the Party;

This proposal is geared towards enabling the Federation and the clubs to mobilize Arab Americans to take full advantage of these opportunities and to head into 1989 sounder organizationally and stronger politically.

Please take a moment to review the enclosed proposal. Your comments or suggestions on the implementation of this plan are encouraged and welcomed. In the coming weeks, the Federation and the Bush campaign will be contacting you to discuss the implementation of this proposal.

[2] In California, Arab American Republicans secured one Party central committee seat and registered impressive showings in races for two other seats. Sam Badawi was elected in Santa Cruz County's 5th supervisorial district, holding one of the five open seats.

In Santa Clara County, John Farage, President of the county Arab American Republican club, ran sixth with 8,100 votes in the central committee elections, but not enough to capture one of the 1st district's five open seats. David Salah, running in the county's 2nd district, collected 3,000 votes but fell short of capturing a committee seat.

[3] Luis Acle, in a hard-fought race in California's 44th congressional district, was defeated by his Republican primary opponent Rob Butterfield. Mr. Acle, who received 10,000 votes, 43% of the vote total, remains optimistic about the experience and includes another run for the seat in his future plans.

[4] In Hamilton County, OH, Norman Murdock, a Bush at-large delegate, announced plans to run for the county's Court of Common Pleas, the highest trial level court in the state.

Next month's report will carry an update report on the progress of the campaign organizing. We'll also take a look at Arab American plans for a visible presence at the Republican National Convention.

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Arab American
Republican
Federation



Sent to Key/Key list
ARF

11/20/87

(20)

November 20, 1987

Dear Arab American Republican,

This mailing begins what I hope will be a continuing series of reports on the 1988 Republican Presidential nominating process and Arab American involvement in that process.

[1] Arab Americans for Dole continues to organize community support for the Senator. Mounzer Chaarani, national co-chair of the Dole campaign, is confident that the group will meet its commitment to the Dole campaign. Mounzer urges that if you are interested in working with AA's for Dole or know of others in the community who may be interested to please contact him at (714) 972-2727.

[2] Little more than two months remain before the Michigan Republican Party begins choosing its national convention delegates. The contest over precinct delegates, often termed a "war" between Bush and Robertson forces, is now entering its final stage. Suzanne Sareini, chair of the Arab American Republican Club of Detroit, is currently identifying Arab Americans delegates in the process and also looking for open precincts for possible appointments of Arab Americans to these seats at the January convention. An article on the Robertson campaign is enclosed.

[3] Efforts are also underway to form an "Arab Americans for George Bush" committee. Governor John Sununu of New Hampshire is the Vice President's leading supporter in that important primary state, acting as chairman of the campaign. Former Oregon Governor Victor Atiyeh and Pennsylvania Republican Thomas Yezbak have also indicated their support for George Bush. The Vice President, widely considered the "winner" in the October candidates debate, has maintained a strong lead in recent polls. But while his support grows, others continue to ask just who is George Bush?

Your own comments on the 1988 race and the activities of your local community would be greatly appreciated.

Sincerely,

Charles Zogby

Arab American
Republican
Federation



Election '88 Report
May 1988

Vice President Bush formally sealed the Republican presidential nomination with a victory in Ohio's May 3rd primary, as the state put him over the top in the delegate count. Surveying the latest round of primaries, Arab Americans continue to make impressive gains in the delegate process and are now set to turn their attention towards organizing for the general election.

[1] In Ohio, George Bush's sweep of the state's May 3rd primary produced the second Arab American delegate to the 1988 Republican National Convention. **Norman Murdock**, Hamilton County Commissioner and long-time Republican office holder, will be an at-large delegate in the Ohio delegation. Mr. Murdock has indicated interest in representing Ohio on the Platform Committee at the convention.

[2] **Raymond Howar** was elected as a Bush alternate delegate in the District of Columbia's May 3rd primary and will also be headed to New Orleans. Elected from DC Ward #1, Mr. Howar is also an active member of the District's business community.

[3] In Colorado, delegates elected at the April 4th precinct caucuses attended county conventions across the state on April 23rd. **Sherine Hamawy Centenari**, elected as a Bush delegate in Denver County, was selected to move onto the June 4th State Convention. Ms. Centenari also notes that she had the opportunity to meet Neil Bush, the Vice President's brother, at the county convention.

[4] In a late update report from Georgia, **Mary Zumot** was elected as a Bush precinct delegate from DeKalb County's precinct 5, in the 4th congressional district. Ms. Zumot went onto the county convention and from there was elected to attend the state convention in Albany, GA on April 18th.

[5] Also, in addition to our earlier reports on the activities of **Governor John Sununu** of New Hampshire, we neglected to include that the Governor is a Bush delegate and will also be acting as chairman of the New Hampshire delegation to the Republican National Convention in August.

* * * *

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[6] With only the major presidential primaries of California and New Jersey left on the political calendar, attention now turns to the likelihood of a Bush-Dukakis match-up. Meanwhile, Arab American Republicans, mindful of the organizational opportunities the upcoming election offers, have developed plans aimed at building a nationwide Republican support network for the '88 elections and expanding the base of active Republican clubs. Governor Victor Atiyeh, instrumental in Arab American electoral strategies to date, has undertaken to supervise the implementation of this project. The Governor has received strong and enthusiastic support from the community for the project and hopes to have it officially launched in late May.

[7] In New York City, the Arab American Republican Club held a meeting on May 11th to discuss upcoming local races and what role the club could play in electing Republican candidates. Club coordinator Michele Forzley notes that of particular interest to the club is the race for State Assembly in the 52nd district where Arab American Valerie Butros Simuro is running as the endorsed candidate on the Republican Party ticket. The 52nd district covers Atlantic Avenue, Bay Ridge and Downtown Brooklyn, all areas with a heavy concentration of Arab American voters.

At the meeting, the club met the Republican District Leader for the 52nd district, Joseph Sisisso, to discuss what role the club can play in Ms. Simuro's campaign and how they could mobilize the Arab American community on her behalf. A follow-up meeting to organizing these efforts is planned for May 24th. The club has also tentatively scheduled a July fundraiser for the campaign.

[8] Mike Sarafa kicked off his race for the state legislature in Michigan with a fundraiser on May 5th. Attended by over 500 people from the 69th district, the fundraiser was attended by California State Senator Waddie Deddah, Jim Karoub, Nick Antakli, and former Chair of the National Republican Heritage Groups Council Frank Stella.

[9] In California, Luis Acle will have his first test in the June 7th primary against opponent Rob Butterfield. Mr. Acle continues to pick up solid support from California's Republican organizations. Over the last month, Mr. Acle has received endorsements from the California Republican Assembly, the Hispanic Republican Assembly and the Young Americans for Freedom.

[10] Governor John Sununu ended weeks of speculation and announced at a news conference on May 16th that he would not seek a 4th two-year term. Citing personal matters as his reason for stepping down, Governor Sununu said that he would take a job in private business to help pay for his children's education. The Governor did not rule out running for elective office again. An article on the Governor's announcement is enclosed.

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[11] The Republican Senatorial Committee's April 25th Election Update notes that **Charles Howell**, former state legislator and Tennessee conservation commissioner, has been named as a co-chairman for **Bill Andersen's** 1988 senatorial campaign. Mr. Anderson is a partner in the law office of White House Chief of Staff and former Sen. Howard Baker.

[12] We enclose "Attack of the Killer Pundits" by Don Hodel, and a recent editorial from the Wall Street Journal. Keeping November 1988 in mind, both take a look at why Republicans win elections (by stressing issues) and how they lose them (by running as Democratic look-alikes). As these articles suggest, Republicans, and in particular Vice President Bush, can only win in November by articulating a clear message ("the vision thing") -- conservative ideas and a conservative agenda -- giving Americans a reason to vote Republican. Don Hodel also offers some interesting advice on how Republicans should deal with the Robertson/social conservative wing of the Party.

* * * *

[13] Next month we turning our attention to the Republican Convention and plans for a visible Arab American presence in New Orleans. As these plans develop it is critical that we know of those interested in attending the convention -- there will be activities that you can participate in even if you're not a delegate. Please let the Republican Federation know if you're thinking of going to the convention.

[14] Finally, we'll also take a look at campaign organizing plans for the fall along with the results from the remaining primary states, particularly in California where Arab Americans are running for important Republican County Central Committee seats.

Please keep us in touch with the activities taking place in your own community. This is particularly important as we head into the summer months and ready for the fall campaigns.

The preceding report was compiled by Charles Zogby

93043501403

Governor of New Hampshire Bars Drive for Re-election to 4th Term

By ALLAN R. GOLD

Gov. John H. Sununu of New Hampshire announced yesterday that he would not seek a fourth two-year term.

The 48-year-old Republican said that he would take a job in private business so he could concentrate on personal matters, primarily to earn more to help pay for his children's education. Mr. Sununu, whose annual salary is \$66,000, has eight children, two of whom are in college.

There has been speculation that Mr. Sununu could be a candidate for a Cabinet position should Vice President Bush be elected President in November. The Governor was chairman of Mr. Bush's successful New Hampshire Presidential primary campaign last February.

The announcement at an afternoon news conference in Concord threw open a gubernatorial race that was widely expected to be a sure thing for Mr. Sununu.

On the Republican side, Robert F. Shaw, the former Mayor of Manchester, announced a year ago that he would run for the nomination in the September primary. Representative Judd Gregg, who has been in Congress since 1980, has been mentioned as a candidate. In a statement from Washington yesterday, Mr. Gregg said he would reflect on the implications of the Governor's decision and would announce his plans in the near future. Other candidates are also likely to emerge.

Mr. Sununu's announcement cheered the state Democratic Party and its likely nominee, Paul McEachern, who lost to Mr. Sununu in 1986 with 46 percent of the vote. "It gives me a tremendous opportunity because it will focus the race on me while the Republicans are in their sorting-out phase," Mr. McEachern said yesterday.

Mr. Sununu has strongly supported the nuclear power plant in Seabrook, N.H., which does not have an operating license. His position on the issue frequently put him at odds with Gov. Michael S. Dukakis of Massachusetts, an opponent of the plant who is the likely Democratic Presidential nominee.

Mr. Sununu takes credit for turning around New Hampshire's financial situation while holding down govern-



Associated Press

Gov. John H. Sununu of New Hampshire announcing he will not seek re-election.

ment growth. For most of his years in office, New Hampshire has had the strongest employment picture in the nation.

Mr. Sununu's national reputation has grown in recent years. He is chairman of the National Governors Association and will serve as Mr. Bush's representative to the Republican National Committee's platform panel at the national convention in August.

The Governor said that the Vice President had called him Sunday to ask about his plans. Mr. Sununu would not disclose whether any particular positions were discussed but said there were few he would accept. He added that the possibility of moving to Washington was not a factor in his decision against running for re-election. He also said he would not rule out running for office again.

A graduate of the Massachusetts Institute of Technology, Mr. Sununu taught engineering at Tufts University outside Boston and worked as a consultant before he became Governor. He defeated an incumbent Governor, Hugh Gallen, a Democrat, in 1982.

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Attack of the KILLER PUNDITS

IN 1980, when Ronald Reagan swept into the White House and the Republicans took the Senate, many concluded that America had turned decisively to the Right. Eight years later, the old liberal coalition, exhilarated at the prospect of overturning Reaganism, has launched an aggressive campaign to convince us that the conservative movement is a thing of the past.

In the 1988 primary season, different components of the Reagan coalition naturally engaged in speculations (now over) about who would lead the GOP in the next round of battles for conservative values. But the Democratic coalition and its allies among liberal political commentators are much more interested in getting us to jettison conservative values themselves. To this end, they have resurrected two old tactics.

Tactic #1: Convince Republicans the conservative policies that brought Reagan's victories will today only bring defeat.

One year ago, *Time* published an essay: "A Change in the Weather—As Reagan's era recedes, compassion and government activism regain favor." "Americans," the essay announced, are "coming back home from the picnic of restored nationalism and morale," and are recognizing that it is "time to move beyond the era of self-congratulation and beer-commercial patriotism." In any event, *Time* reported, conservatism "was never an agenda that took deep root anyway." The political rhetoric of compassion is "a signal of [the public's] recoil against the meannesses of Reaganism . . ."

That's quite a mouthful. In support of its bold assertions, the essay trotted out polling data that show that 60 per cent of those surveyed "support increased spending for social programs even if it would require an increase in taxes," and that, by a 3 to 1 margin, respondents want to increase spending for social rather than for military programs. That kind of poll doesn't specify the nature or extent of the proposed increase in social programs, much less the size of the tax hike (\$2? \$50? \$500?) people are willing to endure. And, of course, it doesn't tell us which sacrifices in America's defense capability the public would find acceptable.

I don't buy the theory that America is swinging left. The coalition Ronald Reagan trounced in 1984 is just trying to drag us that way. A Gallup survey published last fall by *Times Mirror* found that 43 per cent of those polled called themselves conservative, while only 30 per cent admitted to being liberal.

Nonetheless, certain conservative commentators seem to be picking up and relaying the *Time* essay's central thesis. George Will recently wrote in his *Washington Post* column that "George McGovern . . . may soon savor a victory especially sweet for being long delayed. The conservative era, such as it was, is coming to an emphatic close." Following Super Tuesday, William Safire advised that "the center of gravity of the Republican Party has moved inexorably to the left."

I think these pundits are wrong. All of the Republican presidential candidates projected messages that would have been deemed radically right-wing in the pre-Reagan era. As Jack Kemp has remarked, "There are no liberals left in the Republican Party. We're all conservatives." Nevertheless, there is a danger that remarks like Will's and Safire's may end up becoming self-fulfilling prophecies if GOP opinion leaders become convinced that, in order to win in November, the Republican Party must build bridges to the Left.

The GOP tried that strategy ritualistically for decades; it doesn't work. The bridges always collapse, leaving Republican candidates high and dry on the losing side. That's what happened in 1986: in one case after another, Republican senatorial candidates sought to distance themselves from the Reagan Administration, and not just on one or two unpopular issues. These Republicans, some of whom had been elected to the Senate in 1980 on Ronald Reagan's coattails, ignored conservative themes, and in some cases rejected offers of assistance from conservative groups. They lost races they should have won, and the GOP lost the Senate.

ONE TROUBLE with kowtowing to liberal Democratic idols is that Republicans will never be able to outbid politicians like House Speaker Jim Wright. According to the *Washington Post*, a senior House Democrat quotes Wright as saying: "Taxing and spending is what we're supposed to do; taxing and spending is what government is all about." We know from experience: if the only difference between Democrats and Republicans is that we want to spend slightly less money on the same "desperately needed" social programs, the GOP loses. Republicans who fail to articulate conservative values only end up sounding cheap and mean-spirited. Without a positive message of their own to respond to, conservative voters stay home and conservative activists fail to work precincts, mass volunteer telephone banks, and shoulder the other Reagan

Mr. Hodel is Secretary of the Interior.

but essential campaign chores for which slick TV advertising can never substitute.

Nor will we deserve to win if the only thing the Republicans offer is a promise to manage the ever-growing Federal Government more efficiently than the Democrats. Political values, like moral ones, have consequences. Republicans will deserve to lose future elections if, by heeding false calls to sell principles for votes, we confuse politics, the world's second oldest profession, with the world's oldest. We have won not by pandering to polls, but by mobilizing our own majority.

Tactic #2: *Divide and conquer.*

As Bill Rusher pointed out in *The Rise of the Right*, the winning conservative coalition consists of three forces: economic conservatives, who favor free markets and limited government; social conservatives, who stress the importance of family and religious values; and foreign-policy conservatives, who emphasize that America must be militarily strong and diplomatically resolute to withstand the threat of Soviet imperialism. Together, this tripartite coalition delivered tens of millions of traditionally Democratic votes to the Republican Party. Faced with the strength of this coalition, Democratic strategists now have hit upon a new use for an old tactic: make the conservatives fight among themselves.

There are any number of ways to play Divide and Conquer. Some journalists do it by repeatedly asserting that the conservative coalition has collapsed. "Republicans in 1988 risk a split between their traditional elite and populist newcomers who helped elect Reagan," trumpets the lead of an article last fall in the *National Journal*. David Shribman, who writes about politics for the *Wall Street Journal*, reported last spring that "a bitter struggle to shape conservatism in the post-Reagan era is already getting under way, and there is little hope of any resolution before the first political tests early next year." More recently Shribman quotes Kirk O'Donnell, president of the Center for National Policy, a Democratic think-tank, as saying "the Republican Party is a coalition that is about to fracture."

Another version of this tactic is to egg on one component of the coalition against another. The *Washington Post* reported that, at the annual meeting of the American

Political Science Association last year, Arizona State University's Warren E. Miller argued "that the chances of . . . Bush defeating a Democratic opponent in 1988 would improve in direct proportion to Bush's willingness to do battle with the Christian Right during the primaries." Taking the other side, in their new book *Politics and Society in the South*, Earl and Merle Black caustically refer to "country clubs and magnificent resorts, the natural habitats of the Republican elite . . ."

Even conservatives play. Two days after the Vice President's third-place finish in the Iowa caucuses, the *Wall Street Journal* reported that well-known political strategist Kevin Phillips "thinks Mr. Bush's best chance to restore his fortunes is to pick a fight with Mr. Robertson." In a *Washington Post* article last August, Phillips asserted that "the Reagan coalition . . . is breaking down."

Phillips is wrong: the Vice President has triumphed without attacking Mr. Robertson—indeed, he has won the support of many social conservatives.

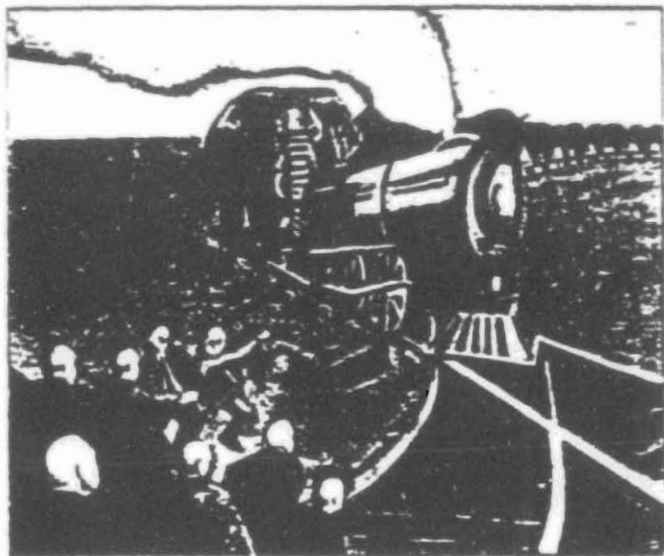
THERE is trouble ahead, however, if the GOP takes social conservatives for granted. Southern voters, blue-collar voters, and ethnic voters deserted the Democratic Party in droves when Democratic candidates failed to address their fears about the breakdown of the family, drugs and pornography, and the triumph of Sixties morality over America's traditional values.

But the Republican Party can't count on maintaining the political support of these traditionally Democratic social conservatives forever. Memories of the Democrats' excesses may fade—and a good many Democrats appear to have learned their lesson: when it comes to extolling "family values," the Democrats' rhetoric (if not their performance) is just as good as Republicans'. As Bill Lacy, formerly of the White House Office of Political Affairs, puts it, "It is important that the Republican Party understand that they are now part of our coalition and that the issues that brought them in are crucial and cannot be dropped." The back burner simply isn't any place for the legitimate concerns of social conservatives.

The GOP ought to invite social conservatives into its party organization. The other side of the coin, of course, is that the newcomers ought to avoid unnecessary fights with those party officials who, although they might not have supported Robertson, have labored long and hard for the conservative coalition. How Republican officials treat social conservatives between now and New Orleans may well determine whether Republican candidates receive their enthusiastic support.

What should the GOP avoid? Shrill statements like the one attributed by the *Washington Post* to a South Carolina Republican who compared a Robertson meeting to "a Nazi pep rally." Nor do we need the kind of blood-letting evident in January's Michigan caucuses, which led Rich Bond, Vice President Bush's Deputy Campaign Manager, to describe Michigan aptly as "the Beirut of Republican politics," and set Congressman Guy Vander Jagt worrying about losing the "blue-collar, suburban Detroit vote Pat Robertson attracted, [which] was an important part of the Reagan coalition." I agree.

This is a matter of some urgency, for the conservative
(Continues on page 60)



Bush and the Presidency

Polls this week show George Bush running 10 points or more behind Michael Dukakis. Anyone in the Bush campaign still arguing that the vice president can overcome this deficit with a quiet campaign should be shipped off to Kennebunkport to play croquet for the next six months. The question is no longer whether it's wise for the vice president to run for the presidency on a slate of concrete issues; the debate now is what those issues should be.

There's some evidence that Mr. Bush himself is arriving at the same conclusion. He is reportedly thinking of hiring speech writers Josh Gilder and Christopher Buckley, whose instincts are to shape issues rather than shovel pabulum. We'd like to be able to feel good about this turn, but we worry more about the Republican tendency, under pressure from the Democrats or the press, to play defense. Somehow for Republicans, life is always a goal-line stand.

The Republican Party has never been able to outgrow a generation of being the congressional minority. Its habit is to believe the road to victory is to be more like the Democrats, to slip into the center, to be better at following the public-opinion polls, to seize some tactical advantage like presidential coattails and to avoid making waves. This has time and again failed, most recently in the Republican loss of the Senate in 1986, which we summarized in a two-sentence editorial: "Issueless elections are not good for Republicans. Maybe they can remember that in 1988."

The polls are often misleading, because they measure what voters think before the issues are debated, while elections measure the outcome of the campaign. But the current polls certainly ought to dispatch the notion that the vice president can simply slide into the presidency. This is a no-win prescription. The route to a Bush victory, quite conceivably a big one, is to take the issues to the people.

By this we have in mind something more than quick bursts, such as beating up on Dan Rather, blurting out a series of disconnected "commitments" at the end of a debate, or of coming up with "moderate alternatives" to such Democratic ploys as the sky as plant-closing laws or universal health insurance. We certainly do not have in mind dredging up a wish list from some pollster's focus groups. What Candidate Bush needs is a diagnosis of what's ailing the Republic, a prescription for a cure, and a request for a mandate from voters. What we'd

suggest is a unifying theme of the American presidency itself, of restoring the proper role for the office Mr. Bush is seeking.

The modern American presidency is a paradox. It remains the world's most powerful institution and commands vast resources. But because of the political and legal depredations presidential authority has absorbed the past 20 years—Vietnam, Watergate, the War Powers Act, the Budget Reform Act, the Ethics in Government Act, Iranamok—there is now a sense in which the office is barely worth having. This year four substantial Democrats—Nunn, Cuomo, Bradley and Robb—turned their backs on candidacy.

Michael Dukakis as president would necessarily be less his own man than a creature of his constituencies. This is why Democratic presidential candidates talk less about foreign policy or the traditional functions of the presidency than about long-term health care, day care, job retraining, and on and on. Mr. Bush's alternative vision of what he is trying to do would come clearer if he fixed in his mind that he is running to become the country's president, not its packhorse. Mr. Bush himself obviously sensed the tendency of these efforts to descend into nonpresidential babble when he remarked during the Republican-Democratic debate that the average viewer might be better off watching "Jake and the Fatman."

There is time enough to draw up a final, comprehensive list of policy initiatives that would emerge from the central matrix of a restored presidency. But three important areas of presidential concern flow out naturally—foreign policy, the Congress and the economy.

Why is the speaker of the House running U.S. foreign policy in Central America? Why has Congress been allowed to wreck the budgeting process and eviscerate the veto authority with a succession of continuing resolutions? The economy is strong because a president acted decisively, driving Congress—and his own economic advisers—to reduce the burden of taxation on productive citizens.

If we have learned anything the past 20 years it is that winning the modern presidency is a mixed blessing. The forces arrayed against the office are large. Mr. Bush should seek his mandate for a strong presidency now so that if he succeeds in November, he has some prospect of succeeding in the next four years.

HODEL

(Continued from page 33)

coalition could break down if the Republican Party begins to believe that there is some inherent inconsistency in its coalition. Perhaps with that in mind, pundits—still pursuing tactic #2—are offering a veritable menu of "choices" conservatives allegedly must make. A *Wall Street Journal* article, for example, tells us that conservatives "have to choose whether to give a greater voice to the Religious Right or to young professionals who twenty years ago might have been lured into the liberals' camp but who today worry about issues of economic growth."

Nonsense! We do not have to choose between the different agendas of the component parts of the conservative movement. A major political party not only can but should deal with a large variety of the problems and issues that confront our society. Voters who identify with conservative candidates primarily because they want economic growth are also concerned about the quality and moral content of the education their children receive—as William Bennett points out, "Everybody cares about their kids." And social conservatives who joined the party mainly because they don't want to be junior partners in a political coalition that includes NOW and the National Gay & Lesbian Task Force can also agree that the answer is less, not more, federal intrusion into our lives.

On specific issues, conservatives may well disagree among themselves. Then Republican leaders will be challenged to accommodate, lest they be forced to choose between, disparate powers of view. That's the function of leadership.

But the surest road to GOP defeat is to lose confidence in the ~~conservative~~ rightness and viability of the conservative coalition—which brought America peace and prosperity, and the Republican Party out of the wilderness. Our enemies are engaged in what I believe is a calculated effort to split the conservative coalition. The stakes are far too high to allow them to succeed.

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Arab American
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Election '88 Report #6
April 1988

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March's Super Tuesday and Illinois primaries, handing Vice President George Bush the Republican nomination, effectively ended active campaigning in the presidential race. Yet the election process continues across the country, with delegates being selected at the precinct caucuses and state primaries that still remain on the calendar. Arab American activity in the 1988 elections pushes forward, particularly at the presidential level, where active planning for the general election has already begun.

[1] Results continue to come in from across the state of Texas where Arab American Republicans have registered impressive gains in the state's caucus system.

* **Houston - Arab Americans garnered 8 precinct delegate slots** in the March 8th caucuses across the Houston area. Many moved on to the March 19th senatorial level conventions and forward still to the to state convention, scheduled to take place in Houston on June 9th-11th.

Louis Macey is headed onto the Texas Republican state convention in June as a Bush delegate. Mr. Macey, elected in the 17th senatorial district, precinct 234, has a long record of involvement in Houston politics. A former city council member and presently serving on the Metro Board, the local public transit authority, Mr. Macey notes that his experience with George Bush dates back to 1970 when he worked on Bush's unsuccessful bid for the U.S. Senate.

Samir Jazrawi, also a Bush delegate, has been selected as a alternate to the state convention from senatorial district 7, precinct 504. Mr. Jazrawi was successful in passing a resolution calling for peace in the Middle East.

Victor Maria will also be attending the state Republican convention as an alternate delegate. Both Mr. Maria and his wife, **Norma Maria**, were elected as Bush delegates from precinct 25. Mr. Maria did attempt to introduce a resolution on Palestinian statehood but noted that it was met with strong opposition and some rather contentious behavior on the part of the precinct leadership and other delegates.

Jomana Amara went to both the precinct and senatorial conventions as a Bush delegate. Ms. Amara, elected in senatorial district 17, precinct 4, was also appointed to the resolutions committee, but was unsuccessful in her attempt to introduce resolutions on Palestinian statehood and Lebanon.

Janet Mousa was elected as a Bush delegate from senatorial district 7, precinct 14 and attended both the precinct and senatorial conventions. Though she did not make it to the state convention, Ms. Mousa nonetheless hopes to attend the June state convention as a volunteer.

Assad Shorrosh was also elected as a Bush delegate from senatorial district 7, precinct 648 and attended the March 8th precinct convention.

Zahra Khatib rounds out the field of Arab American Bush delegates. Elected in precinct 350, senatorial district 13, Ms. Khatib attended both the March 8th and 19th conventions.

Though not running as a Bush delegate, **Samir Foteh** joined with other Arab American businessmen in running advertisements in support of George Bush. The ads, run just before the March 8th primary, were promoted jointly with the Fort Bend County Republican Women's Club.

* **Dallas-Ft. Worth** - **Bill Gunselman** was appointed to nominations committee for the 26th congressional district. The committee was charged with selecting delegates to go on to the Republican National Convention in New Orleans. Though not among those selected by the committee, Mr. Gunselman reports that an opportunity to go forward still exists in the at-large delegate process, where he hopes to make it as a national delegate.

George Aldridge and **Issa Kamar**, both of whom were elected as delegates at the March 8th caucuses in Dallas, made it on to the March 19th senatorial level conventions. Each senatorial convention sent forward 3 delegates to attend the state convention in June. Mr. Aldridge and Mr. Kamar were not selected to go on to the state convention. **Joe Chamy**, who was also selected to go to the senatorial convention, was unable to attend due to an illness in the family.

[2] In Colorado, **Sherine Hamawy Centanari** was elected as a Bush delegate at the April 4th precinct caucuses, from 535th precinct in Denver County. Ms. Centanari goes onto the April 23rd county conventions and hopes to make it to the state convention.

[3] **Emil Haddad** helped give the Bush campaign a boost in Illinois, where Bush handily won the March 15th primary. Mr. Haddad, a committeeman in precinct 29, York Township, worked in getting out the vote on election day and was able to deliver his

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precinct for Bush. Mr. Haddad also had the opportunity to meet the Vice President as he was campaigning through the state.

[4] **George Salem**, representing the Arab American Institute, appeared before the Republican National Committee's **Committee on the Platform** on March 30th, urging the Party to include in its platform a plank calling for Middle East peace based on the formula of Palestinian self-determination, with rights to statehood.

Speaking before the Committee, which included Republican National Committee **Chairman Frank J. Fahrenkopf, Jr.**, RNC Co-Chair **Maureen Reagan** and Committee Co-Chair **Senator Bob Kasten**, Mr. Salem cited the "tornado of political violence and unrest" in the Occupied Territories as evidence of the failure of U.S. policy in the region. Noting the brutal tactics used by Israeli soldiers and the resulting deaths and injuries, Mr. Salem stated that these "atrocities should weigh heavily on the conscience of American taxpayers."

In concluding, Mr. Salem urged the Committee to include in the Party's platform a plank supporting Palestinian statehood. A copy of the press release on the hearing is enclosed. A full transcript of Mr. Salem's testimony is available upon request.

The platform process continues with hearings in Kansas City on May 31st, covering domestic and natural resources issues; in Los Angeles on June 30th, covering economic and international trade; and in New Orleans before the national convention in August with the full platform committee meeting. Arab Americans will be meeting with the committee staff in late April to discuss how our community can play a greater role in the process and to insure our concerns receive a hearing before committee.

* In a related note, The Washington Post reported on April 11th that New Hampshire **Governor John Sununu** has been assigned a new job in the Bush campaign by the Vice President. According to the Post's report, Bush aides said the Governor has been designated to oversee platform issues.

[5] **Governor Victor Atiyeh** was in Washington in late March, meeting with Vice President Bush and George Bush for President campaign officials. The campaign, now laying the groundwork for general election, discussed with the Governor the preparation of plans for active Arab American participation in the fall. Governor Atiyeh informed the campaign that efforts to build support for the Vice President in the Arab American community has already succeeded in producing offers of volunteer support in 20 states. The Governor expressed his belief that the Arab American community was willing to play a full role in the Bush campaign and welcomed the organization's efforts to bring Arab Americans into the process.

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[6] In California, the main focus of Arab American Republican political activity centers on the June 7th primary, now little more than a month away, where congressional races and important central committee contests are to be decided.

* **Sam Badawi** has a lock on a Republican Party Central Committee seat in Santa Cruz County. The March filing deadline passed with five candidates, including Mr. Badawi, remaining uncontested, for the central committee in the 5th district.

* In San Mateo County, **Bashir Meer** collected 50 signatures to ensure his presence on the June 7th ballot for a Republican Party central committee seat. Mr. Meer is running in San Mateo's 3rd county district.

* The Executive Board of the San Jose/South Bay chapter of NAAA met with Republican candidate for California's 12th congressional district seat, **Tom Campbell**, on March 25th. The meeting was arranged by **Sami Ibrahim**, acting as liaison between the Campbell campaign and the chapter. Also attending the meeting were **Abdel El-Shaieb** and **Isam Qubain**. All three gentlemen are members of the Arab American Republican Club of Santa Clara County. Both Campbell and Republican incumbent Rep. **Ernie Konnyu** attended the NAAA chapter's annual banquet on April 9th.

* **Mounzer Chaarani**, Chairman of the Arab American Republican Club of Orange County, reports that the club is keeping a watchful eye on the race for the Republican nomination in the 40th congressional district. The race for the open seat, created by the decision of incumbent Rep. **Robert Badham** not to run for a 7th term, has produced a host of would be contenders. The Orange County club has already met one of the leading candidates, **Nathan Rosenberg**, and hopes to meet with others before the June 7th primary, including another front runner, **Dave Baker**.

An April 15th meeting of the club featured **Costa Mesa City Councilman Peter Buffa**, who only recently withdrew from the congressional race. **Norman Tanber** reports that Mr. Buffa, who is of Italian descent, spoke of his own experiences in meeting with ethnic prejudice and stressed active political participation as a means of overcoming such prejudices.

In another California congressional race, the Orange County club lent its support to Arab American **Luis Acle** at a fundraiser on April 8th. Mr. Chaarani notes that Mr. Acle was able to meet members of the local community and share with them the progress of his campaign. Mr. Chaarani said that he also hoped that club could further aid in Mr. Acle's campaign in the near future.

* In Los Angeles, **Paul Stephen**, President of the **William**

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Neima Club, a group of active Arab American Republicans, reports that the club will be holding a May 20th reception for Republican Minority Leader of the California Assembly **Pat Nolan**.

[7] **Mike Sarafa**, running hard for the state legislature in Michigan, picked up two key endorsements in the past weeks. **Colleen Engler**, a former candidate for lieutenant governor and also a former legislator, endorsed Mr. Sarafa after a meeting with the candidate in early April. California State Senator **Waddie Deddah**, a prominent member of the Chaldean community, also lent his support to Mr. Sarafa's effort. The campaign kicks-off with a fundraising event on May 5th.

[8] **Luis Acle's** campaign continues in his race for 44th congressional seat. The campaign got a big boost on April 7th when Congressman **Duncan Hunter** of the 45th district formally endorsed Mr. Acle. Congressman Hunter's endorsement, whose old district covered about 80% of the current 44th, is considered significant in that it brings to the campaign many new supporters and volunteers. The next major event for the campaign comes on April 30th when Senator **Alan Simpson** (R-WY) comes to San Diego for a major fundraising event.

Mr. Acle now faces a June 7th Republican primary challenge from San Diego attorney **Rob Butterfield**. In a district where Democrats outnumber Republicans by almost 2-1, one stark difference between the candidates is in their strategy for appealing to Democratic voters. Mr. Acle believes that his conservative approach will appeal to traditional and fiscal conservative Democrats disaffected with present incumbent Rep. **Bob Bates'** liberal record. Mr. Butterfield's approach is more moderate and liberal on the issues, leading Mr. Acle to feel it difficult for any Republican to out-liberal Bates as a way of attracting Democratic voters.

[9] The Iowa caucuses are but a faint memory but **Tony Nassif** of Cedar Rapids continues his work on behalf of the remaining Republican contender, **Pat Robertson**. Mr. Nassif opted against continuing on in caucus process and instead put in six weeks of work in California, mainly in Los Angeles and Orange County, working as the special events coordinator for the campaign.

[10] The Arab American Republican Federation now has access to a fax machine. The machine enables us to send written information over telephone lines, faster, quicker and more reliable than conventional methods. For those with access to a fax machine our number is (202) 429-9214. To take full advantage of this system it also requires us to have knowledge of your fax number. If you have a fax, or access to one, please let us know the number.

The preceding report was compiled by Charles Zogby.

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Arab American
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Election Report #5
March 1988

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Republican Super Tuesday involved presidential contests in 17 states, primarily in the Southern and border states. Arab American Republicans were active in several states, most notably Texas. A look at the results of Arab American participation in Super Tuesday follows:

[1] Texas provided impressive results for Arab American Republicans. In the Dallas-Ft. Worth area, 5 Arab Americans were elected as delegates and will now head on to the March 19th senatorial level conventions.

* **Bill and Ghada Gunselman** were elected as Bush delegates in the 82nd precinct in Collin County and were successful in passing a resolution on Palestinian rights.

* **Joe Chamy** was elected as a Bush delegate in the 4343rd precinct in Ft. Worth. Unable to get a resolution passed in the precinct caucus, Mr. Chamy intends to reintroduce a resolution on Palestinian rights and another calling for a 50% cut in foreign aid before the resolutions committee on March 19th.

* In Dallas, **Issa Kamar** was also elected as Bush delegate in the 1167th precinct. Mr. Kamar was successful in getting a modified resolution on Palestinian rights passed at the March 8th caucus, calling on U.S. support for an international peace conference.

* **George Aldridge** was selected as a delegate in Arlington's 2169th precinct. Mr. Aldridge was successful in getting a resolution on Palestinian rights passed and was also elected to the position of precinct secretary.

* In Houston, **Dr. Adib Mikhail** was unsuccessful in his bid to become a Dole delegate in Montgomery County's 32nd precinct. Dr. Mikhail had been the Texas Co-Chair of "Physicians for Dole"

[2] An intense period of campaign work for **David Zachem**, the Florida State Coordinator for Pat Robertson, culminated on Super Tuesday. Mr. Zachem was interviewed by the Wall Street Journal in a pre-primary article focusing on Florida. Having earlier declared George Bush "dead in the bed" and predicted a strong showing for Robertson in Florida, Mr. Zachem was not vindicated

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by the March 8th results. Bush finished strongly with 62% of the vote compared with 21% for Dole and 11% for Robertson. Bush's showing was good enough to capture all of the state's 82 delegates.

[3] Super Tuesday was conceived by Southern Democrats to give the South a greater voice in the nominating process. The hope was to produce a nominee more acceptable to conservative whites who have been a key element in the Republican Party's ability to capture four of the last five presidential elections. The degree to which the Democratic Super Tuesday strategy succeeded is debateable, but Republican observers are enthusiastic over the results.

For Republicans, Super Tuesday's major impact has been to solidify gains already made in the continued realignment of South. It's no longer the old Democratic South. Record turnout in the Republican primaries buoy the Party's chances for November and reinforces the possibility of majority status. Two reports on the GOP's gains from the Wall Street Journal and New York Times are enclosed.

[4] Illinois held its primary on March 15th. While no Arab Americans were up for delegate positions, **George Dandan** of Westmont was elected as a committeeman from the 76th District in DuPage County.

[5] The **National Republican Heritage Groups Council** has passed a resolution calling for an end to the violence in the Occupied Territories and for peace negotiations, under the auspices of the UN Security Council, between Israeli and Palestinian people. The resolution was the product of efforts by **Fuad Sahouri**, the Arab American Republican Federation representative at the Council's January Executive Board meeting. A copy of the resolution is enclosed.

[6] In California, Arab American Republicans are carrying forward the momentum gained from their impressive showing at the State Party's February convention. Three Arab Americans are now running for the Santa Clara County Central Committee while one has received appointment to the state central committee. **John Farage** is running in the 1st district, **David Salah** in the 2nd district and **Sami Ibrahim** is also competing for a central committee seat. **Joe Louis** was appointed to the state central committee by California State Assemblyman Chuck Quackenbush.

[7] Billing itself as the "conservative watchdog of the establishment media", Between the Lines made its appearance in early 1988 and is edited by **Joseph Farah**. Mr. Farah notes that the surveys of the media elite "shows that the people who write, edit and shape the news are far more liberal than the average American". Those interested in reviewing a sample copy or subscribing can do so by writing BTL at P.O. Box 2870, Palos Verdes, CA, 90274.

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[8] The final report of the Republican National Committee's Committee on Minority and Ethnic Participation (CMEP) was released this month, ending a year-long examination of the relationship between the Republican Party and the various ethnic and minority communities. Fuad Sahouri, representing the Arab American Republican Federation, testified before the Committee in June 1987, calling, in part, for ethnics and minorities to not only be given access to leadership positions in the Party but also greater opportunities to "actively participate in the formulation of policies and programs."

The final report contains recommendations on what steps the GOP needs to take in order to build coalitions within the minority and ethnic communities. Concluding that Republicans "must make every effort to bring minorit(ies) and ethnic(s) into the mainstream of the Party" the report recommends:

- 1) the implementation of a long-term coalition outreach plan at the national level;
- 2) the education of Republican candidates on the importance of outreach efforts and urging the candidates to personally interact with these communities;
- 3) that the RNC continue to work in developing programs and activities that promote, educate and advance Republican spokespeople from the minority and ethnic communities; and
- 4) that the RNC work with state and local GOP organizations to promote a better understanding of the vital role minority and ethnic voters can play and assist them in implementing outreach programs.

Copies of the report will be made available upon request.

[9] In our February report, we should have noted that **Mike Sarafa** is running for the state legislature in Michigan's 69th district, not the 64th. The primary for this open seat will be held on August 2nd. The district includes many communities, among them, Southfield and Farmington Hills.

[10] Also in Michigan, the New York Times reported on March 6th that Republican Party officials had been trying to recruit Michigan State Chair **Spencer Abraham** to challenge Senator Donald Riegle, Jr, the Democratic incumbent. The report concluded that Mr. Abraham was "too overwhelmed trying to hold the party together to run", alluding to the party's precinct delegate process which was marred by a bitter battle between Robertson, Kemp and Bush supporters.

[11] **Tom Saidy**, formerly of the San Francisco Bay Area, is now in Washington, working full-time at the national headquarters of George Bush for President. Mr. Saidy works in the research department at the campaign.

RESOLUTION

WHEREAS

the United States has historically supported the principles of self-determination and statehood for peoples under foreign occupation;

WHEREAS

the Palestinian people living on the West Bank and Gaza Strip have been under foreign occupation of the state of Israel for over 20 years;

WHEREAS

the United States has consistently recognized the right of the Palestinian people to self-determination;

WHEREAS

the Palestinian inhabitants of the West Bank and Gaza Strip have been denied such political and human rights;

WHEREAS

such violations have escalated to crisis proportions within the last 90 days, including the inhumane use of live ammunition, mass arrests, deportations, beatings, and indiscriminate killings of unarmed men, women, and children;

THEREFORE,

we respectfully urge the President of the United States to call immediately for the end of all violence and the immediate establishment of a peace conference ~~under the auspices of the United Nations Security Council~~, wherein the representatives of both the Israeli and the Palestinian people shall be parties.

NATIONAL REPUBLICAN HERITAGE GROUPS COUNCIL

APPROVED: January 23, 1988

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G.O.P. Gains Seen in South's Turnout

By MICHAEL ORESKES

The crumbling remnants of the solid Democratic South were dealt another blow in Tuesday's primaries, when hundreds of thousands more people voted in Republican primaries than had ever done so before.

Republican strategists were elated, and even the Democrats conceded that the appeal of the Republican line was not dependent on having Ronald Reagan at the top of the ballot.

"It shows that Georgia is a bona fide two-party state," Georgia's Secretary of State, Max Cleland, a Democrat, said in announcing that nearly 400,000 voters had participated in the state's Republican primary. That was double the record set in 1980, when Mr. Reagan defeated George Bush.

About 550,000 Georgians voted Democratic.

Hailey Barbour, a Mississippi lawyer who conceived a campaign to attract voters to the Republican race, said there had been record turnouts in 11 Southern primaries.

Turnout Put at 14.4 Million

Sixteen states, 14 in the South or bordering it, held primaries in both parties. The Democratic primaries drew

'That's a far cry from the old solid South.'

9.8 million voters and the Republicans attracted 4.8 million.

In eight of the Southern states there is no registration by party, so voters were free to choose either Presidential primary Tuesday but were not committing themselves to sticking with the choice in later primaries for local races. Still, the campaign to get them to vote Republican was an effort to influence their state of mind for the future, in contests for everything from President to sheriff.

In some other states, such as Louisiana and Oklahoma, voters must register by party in advance. Officials did report a modest increase in Republican registration.

All told, about 44 percent of the Southern vote Tuesday was cast in Republican primaries, the Republican National Committee said.

Reagan Called 'Very Impressed'

"So that's a far cry from the old Democratic solid South, and that may be the most significant single aspect of Super Tuesday," said Howard H. Baker Jr., the White House chief of staff and former Senate Republican leader from Tennessee.

The chief White House spokesman, Martin Fitzwater, who was traveling with President Reagan aboard Air Force One to South Bend, Ind., described the President as "very impressed with the Republican turnout."

There were about 1.5 million more people voting Republican in 10 key Southern primaries this year than in 1980, said Kathryn Murray, communications director for the Republican National Committee.

Nevertheless, Democrats still outpolled the Republicans. In Florida, 877,239 voted Republican, up from 615,000 in 1980, while about 1.2 million voted Democratic.

A More Competitive G.O.P.

The point, Republican strategists said, is that the party can be far more competitive in the future. For nearly a century after the Civil War the Republican Party was nonexistent in the South. But since 1964, Republicans have carried the South in every Presidential election except the one in 1976, when Jimmy Carter of Georgia headed the Democratic ticket.

Democrats still dominate at state and local levels. But Republicans have begun to make inroads in such places as the booming suburbs of Atlanta.

As part of their effort to build the party, Southern Republicans mounted an extensive campaign, including a letter signed by Mr. Reagan urging Democrats and independents to vote in the Republican primary.

Lee Atwater, Mr. Bush's campaign manager who is an expert on Southern politics, said the results would provide the Republican Party with the names of thousands of voters sympathetic to the party for future campaigns.

"It's the most important day in the history of the Southern Republican Party," Mr. Atwater said. "It literally swelled the potential Republican ranks in each state, and that was a real gift to the Republican Party."

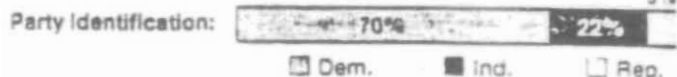
For this "gift" he thanked the Southern Democrats who created Super Tuesday in the hope of promoting the nomination of a Democrat who could carry the South in the general election. "The biggest political boo-boo of the decade was Super Tuesday," Mr. Atwater said.

Signs of Realignment

Tuesday's Crossover Voters

Eight of the Southern and border states allow voters to cast ballot in either party's primary, regardless of their party registration. The states are Alabama, Arkansas, Georgia, Mississippi, Missouri, Tennessee, Texas and Virginia.

Democratic Primaries 5.1 million voters in all



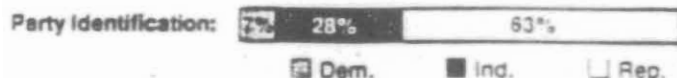
How each group voted Tuesday

	Dukakis	Gephardt	Gore	Jackson
Dem.	23%	14	25	33
Ind.	22%	18	37	14
Rep.	20%	12	45	13

Intended vote in November

	Definitely Republican	Probably Republican	Probably Democratic	Definitely Democratic	Can't say yet
Dem.	3	2	22	57	13
Ind.	9	9	17	15	48
Rep.	36	18	16	7	22

Republican Primaries 2.7 million voters in all



How each group voted Tuesday

	Bush	Dole	Robertson
Dem.	48%	30	15
Ind.	53%	22	17
Rep.	60%	20	14

Intended vote in November

	Definitely Republican	Probably Republican	Probably Democratic	Definitely Democratic	Can't say yet
Dem.	42	18	11	3	25
Ind.	44	23	1	1	30
Rep.	74	13	1	1	10

Based on questionnaires completed by 4,701 Democratic primary voters and 3,855 Republican primary voters as they left polling places on Tuesday in the eight Southern and border states with open primaries.

GOP Southern Comfort

Almost all the media coverage of Super Tuesday focused on the primary results for the two parties. But observers looking for clues as to which party ultimately will win this November also paid close attention to the number of voters each party attracted to the polls. The results show that Republicans had record turnouts for their primary in almost every Southern state, while many Democrats either stayed home or crossed over to vote for GOP candidates.

Democrats had every reason to expect the opposite. The presence of Jesse Jackson and Al Gore on the ballot, both of whom stressed their Southern roots, and the more heated nature of the Democratic contest led party officials to predict a horde of new voters in their primaries. Democratic turnout did go up in a few states—notably Senator Gore's Tennessee—but overall the Republicans showed surprising strength, especially in "cross-over" states where voters could participate in either contest:

- In 1980, the last time both parties had spirited races for President, two-thirds of Georgia primary voters chose a Democratic ballot. This year, some 40% of the votes were cast in the GOP primary. Republican turnout went up 75%.

- In Texas, the Republican share of all primary votes went from 28% in 1980 to 37% in 1988. The GOP turnout

hit one million, up from 520,000 in 1980.

- In Mississippi, the GOP primary attracted 160,000 voters—more than double the total of any previous primary.

In states where the primaries were closed to voters of another party, the Republican turnout also increased dramatically. North Carolina's GOP primary attracted 276,000 voters, up from 168,000 in 1980. The Democratic turnout fell to 680,000 this year from 737,000 in 1980.

Southern politics has undergone a remarkable transformation in the past 25 years. Jesse Jackson is plausible when he says that a generation ago the four Southern states he won on Super Tuesday would not have allowed him to vote. And the South also has developed a vigorous two-party system; a majority of the region's residents now live in states with Republican governors.

The South is now clearly the pivotal region in presidential politics; no candidate is likely to win in November unless he carries several states below the Mason-Dixon Line. The fact that Southern voters are continuing to identify in greater numbers with the Republican Party suggests that centrist Democrats have work to do convincing the region that they are something more than the party of Northern liberalism.

Arab American
Republican
Federation



Election Report #4
February 1988

* * *

Arab American activity in the 1988 elections continues to expand. The casting of the first ballots, officially opening the 1988 campaign season, heightened attention on the process and brought on a rapid increase in our work. The following is an update of the events and activities that have taken place in the last few weeks.

First a recap of Arab American involvement in the contests to date.

[1] As Bob Dole swept through Iowa, Arab American participation in the Republican caucuses centered on Pat Robertson. **Tony Nassif**, a caucus leader in precinct 18, Grantwood School, Cedar Rapids, reports that Robertson took second place in the precinct to Dole with 25% of the vote. Mr. Nassif notes that the Arab Americans who participated in his precinct voted for Robertson based largely on the candidate's emphasis on moral values, as well as his proposed solutions to international trade and budget problems.

[2] Citing the "enormous support" he received from New Hampshire Governor **John Sununu**, George Bush claimed victory in the hard fought February 16th primary. The strong state organizations of Gov. Sununu and Congressman **Judd Gregg** played a big part in helping to secure a Bush victory in the Granite State.

On another note, Gov. Sununu was in Washington following the primary for a conference of the National Governor's Association. The Governor serves as chairman of the NGA.

* * *

[3] In California, Arab American Republicans took several major steps, forming two new county Republican clubs and gaining access to the decision-making bodies of the party.

[a] In northern California, the newly-chartered Arab American Republican Club of Santa Clara County held its first meeting on January 28th. The club has 29 dues paying members and elected **John Farage** as President, **Sami Badawi** as Vice President and **David Salah** as Treasurer. The club was certified by the county party on February 18th as associate members, giving them

918 16th Street NW • Suite 501 • Washington, DC. 20006 • (202) 429-9210

Clubs: Chicago, Cleveland, Detroit, Flint, Houston, Knoxville, Orange County Calif., Philadelphia, San Francisco, West Hempstead, Yonkers.

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membership on the party's central committee. The club leaders also met with the party's executive director to discuss the club's role in party activities.

The Santa Clara club's first major activity was establishing a presence at the State Republican Party convention, held in Santa Clara on February 19-21. The club organized a petition drive at the convention, obtaining over 200 signatures of support for resolutions calling for Palestinian self-determination and an end to the Iran-Iraq war. The resolutions were also presented at meetings of the resolution and platform committees and received support from the floor. The club also hosted 400-500 of the party faithful, including Republican elected officials and candidates at a hospitality suite at the convention hotel on the 20th.

Victor Ajlouny, of San Jose, chaired the Santa Clara County Republican Party's annual Lincoln Day dinner on February 12th. The dinner is a major event on the party's calendar and ten to fifteen Arab Americans were on hand for the evening's activities.

Joe Louis, also of San Jose, was recently appointed to Congressman Ernie Konnyu's Advisory Committee. The Committee meets each month with Rep. Konnyu, discussing and advising him on the issues of the day. Mr. Louis plans to keep the congressman apprised of issues of concern to the Arab American community.

[b] Arab Americans have also established a Republican presence in San Francisco. A new club was formed in San Francisco County led by Samir Totah. Mr. Totah was instrumental in bringing the club's membership together and has already had the club certified by the county party as associate members, also earning the club a seat on the party's central committee.

[c] Updating an announcement we made in our last report, Luis Acle has officially announced that he is a candidate for the U.S. Congress in the 44th district in San Diego. He has also announced Barry Shilloto, a former Assistant Secretary of Defense, is signing on as his new campaign chairman.

Mr. Acle was in Washington in late January for a fundraiser hosted by the local Arab American Republican club. He returned on February 24th for a fundraiser on Capital Hill, hosted by the Republican Minority Whip, Senator Alan Simpson of Wyoming, at which several local Arab Americans attended.

[4] Speaking of candidates for elective office, Mike Sarafa of Southfield, Michigan has decided to make a run for the state legislature in the 64th district. Though not yet officially announced, Mr. Sarafa hopes to use his candidacy to mobilize the community and create a larger voice for Arab Americans in the

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party. At 22 years of age Mr. Sarafa is also the youngest candidate in the field and the youngest Arab American seeking elective office.

[5] Arab Americans undertook a major volunteer effort for the Bush campaign in the Collin County on Feb. 20th. Coordinated by **Bill Gunselman**, the volunteers made calls to a list of 1000 undecided voters in the county urging them to vote for George Bush. This effort represents the largest volunteer activity to date in the county as the Bush campaign works up to the March 8th primary.

[6] Arab American Republican club chair **Dr. Shibli Sawalha** met on February 19th with George Bush for President campaign officials in Illinois, including Sheriff Jim O'Grady. The officials welcomed Arab American participation in the campaign and discussed how the community could help for the March 15th primary. Dr. Sawalha is scheduled next to meet with Scott Fawell the GBFP Executive Director in Illinois to set out a more detailed plan of action.

[7] The GBFP headquarters in New York City recently gained another Arab American volunteer. **Kamil Zogby, Jr.** began as a part-time volunteer on February 21st. Mr. Zogby is helping the campaign sort through Bush delegate petitions. The signatures on the petitions are being challenged by other campaigns, creating the need for a line-by-line review of the petitions.

[8] We are also pleased to announce that **Joe Kyrillos**, of Middletown, New Jersey, took office in January as a state legislator from New Jersey's 13th district. Mr. Kyrillos worked on the Reagan-Bush '84 campaign and also with Secretary of the Interior Donald Hodel's office.

* * *

Editorial Notes

We would like to mention that we do our best to contact everyone to put together a complete roundup of events and activities. But we need your help in making sure that we do not miss any activity or effort. Please call with any information of events and activities taking place going on in your community.

Finally, the circulation of this report, though growing, does not reach everyone. We would appreciate your help in disseminating this report to members of the community so that it receives the broadest readership. Also, if there individuals who you know are active but are not hearing from us directly, please gives us their names so that we can make sure they receive information. Thank you for your help.

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Arab American
Republican
Federation



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Election Preview Report #3
January 1988

The 1988 Republican presidential nominating process begins in earnest this month as precinct delegates meet in county conventions across Michigan to begin selecting the first delegates to the Republican National Convention. State and local races will also be prominent in November. The following is a state-by-state account of the activities of Arab American Republicans in elections 1988.

* * * ✓ *

[1] Michigan (January 29th) - **Suzanne Sareini** is working with State Senator and GBFP Co-Chairman John Engler's office in identifying Arab American precinct delegates. The delegates turned out for last week's congressional district meetings and will be attending the state convention on the 29th. **Tallal Hamed**, a student volunteer from Dearborn, is also joining the Bush effort.

[2] Iowa (February 8th): Hoping to turn out supporters of the Rev. Pat Robertson for the Iowa caucuses, **Tony Nassif** of Cedar Rapids has been working as the special events coordinator for the Robertson campaign in the 2nd congressional district. Mr. Nassif notes that Robertson just completed a whistle stop tour of Iowa, covering 27 cities in just two days.

[3] New Hampshire (February 16th) - Announcing his support for the George Bush in February 1987, **Governor John Sununu** became the first of the nation's governors to publically support the Vice President. Governor Sununu serves as both a National Co-Chair and the New Hampshire State Chairman of GBFP.

[4] Texas (March 8th): ✓

a. Dallas - **Bill Gunselman** of Allen, TX has been appointed as a regional coordinator for the GBFP campaign in Collin County. As a regional coordinator, Mr. Gunselman will be overseeing the Bush campaign's activities for half of the county. He is also planning to run as a Bush delegate in the 26th congressional district. Also looking to play an active role in policy area of the campaign, Mr. Gunselman has requested appointment to the issues review committee for the county, which reviews resolutions at the precinct and county level and approves those to be sent to the state convention. He plans to introduce a Middle East peace resolution.

Also volunteering his support for the Bush effort is **Hisham Tagi** of Lancaster. Mr. Tagi is a long-time resident of the Dallas area and has offered his help in bringing other interested Arab Americans into the Bush campaign. Finally, **George Aldridge** of Ft. Worth is planning to run as a Dole delegate and has been in contact with Dole campaign representatives in Dallas.

b. Houston - **Samir Foteh** will be coordinating Arab Americans for George Bush activity in the Houston area. Mr. Foteh has been an active member of the local Republican Party and hopes to mount a strong volunteer effort for Bush. Mr. Foteh has met with Bush representatives to discuss an Arab American role in the campaign and recently joined with other Houston businessmen in an ad campaign in support of the Vice President.

Also in the Houston area, **Dr. Adib Mikhail** of Woodlands is seeking to play an active role in the Dole campaign. Dr. Mikhail met with representatives of the Dole campaign in late December at the Republican candidates' debate in Houston and recently met with Dole Co-Chair and Arab American Mounzer Chaarani. He is presently exploring the possibilities of running as a Dole delegate.

[5] Virginia (March 8th): **Michael Hadeed, Jr.** has filed to become a delegate in Alexandria, meeting the February 1st deadline. **Robert Clark** of Arlington is considering to run for a delegate slot to the state convention. Though Virginia does not require delegates to declare whom they support, both gentlemen have indicated that they back Bush.

[6] Illinois (March 15th): **Dr. Shibli Sawalha** will be coordinating Arab American efforts in the Greater Chicago area. Dr. Sawalha is a Republican committeeman from District 9, Homer Township and chairman of the Arab American Republican Club of Chicago. Dr. Sawalha is scheduled to meet with GBFP Vice Chairman Sheriff Jim O'Grady in early February to plan the Arab American effort role in the campaign. **Emil Haddad** of Elmhurst is also supporting George Bush. Mr. Haddad, a committeeman in York Township, has met with the Bush campaign and noted that he will be working his precinct to get out the votes for the Vice President.

Assisting the Arab Americans for Dole effort is **Ray Baroud** of Des Plaines. Mr. Baroud has been concentrating on fundraising efforts on behalf of Senator Dole. He has also been very active in organizing voter registration efforts and has assisted in signing up over 50 Arab American deputy registrars.

In other notes, **George Dandan** of Westmont, IL has announced that he will be running for committeeman in the 76th district, DuPage County.

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[7] Ohio (March 15th): Hamilton County Commissioner **Norman Murdock** is playing an active role in the GBFP campaign in Ohio. Mr. Murdock has been slated by the Bush campaign to run as an at-large delegate for the state. Mr. Murdock was the former OH Co-Chair for the Reagan/Bush ticket in 1980 and a delegate to the 1980 Republican National Convention.

[8] New York (April 5th): Efforts are under way to establish an Arab American Republican Club in the New York area. **Michele Forzley**, recently appointed as the Republican Party District Leader for lower Manhattan, is coordinating both the club's efforts and work on the GBFP campaign. The club has held a series of monthly meetings and includes as part of its program informational talks on various aspects of the political process. At GBFP New York State Headquarters, **Mike Shaheen** of Manhattan, is working as the campaign's Director of Operations, involved primarily in overseeing the delegate petition process.

[9] Pennsylvania (April 26th): A member of the GBFP Steering Committee and Arab Americans for George Bush, **Thomas Yezbak** of Uniontown plans to play an active role in the Bush campaign. Mr. Yezbak was a state chair of Senator John Heinz's re-election campaign and a regional chair for the re-election of Senator Arlen Specter. **Rick Miller**, also from Uniontown, is running as a Bush delegate in the 22nd congressional district.

[10] Oregon (May 17th): **Governor Victor Atiyeh** serves as both the Chairman of the Arab Americans for George Bush Committee and the GBFP Honorary Chairman for the state. Governor Atiyeh is also planning to run as a Bush delegate in Multnomah County (Portland area). Former regional chair of the Arab Americans for Reagan-Bush '84 committee, **Sam Khal**, is also moving ahead with plans to run as a Bush delegate.

[11] California (June 7th): California is at the end of the long presidential nomination journey and as the nation focuses on Iowa and New Hampshire, **Mounzer Chaarani**, a National Co-Chair of DFP and the chairman of Arab Americans for Dole, continues to build support for Senator Dole across Southern California and the country. Mr. Chaarani reports that Arab Americans for Dole has helped raise over \$25,000 for the campaign.

Underscoring the importance of access to a presidential campaign, Mr. Chaarani recently urged Senator Dole not to take part in an effort to fight the American Civil Liberties Union's attempt to keep the PIO Washington office open. He also called upon Arab American supporters and contributors to the Senator's campaign to join him in this effort. We can report that the January 6th deadline for Dole to sign up with the effort has passed and that Dole did not join the fight.

Also in California, **Luis Acle**, Arab American and former White

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House Associate Director of Public Liaison will soon be announcing his candidacy for the U.S. House of Representatives. Mr. Acle will be running in the 44th district, a seat presently held by Democratic Congressman Jim Bates. Arab Americans in Southern California have pledged to support his election efforts and Mr. Acle has promised to make the community an integral part of his campaign.

[12] Tennessee (March 8th) **Charles Howell** of Nashville has been appointed as a Co-Chair of the Bush State Committee and the Chair of the Bush campaign in Davidson County, TN. A long-time active member of the Tennessee GOP, Mr. Howell is also the chairman of the Public Policy Study Committee for state party.

KEY:

State (primary or caucus date)
GBFP = George Bush for President
DFP = Dole for President

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Arab American
Republican
Federation



ARF Election Report #2
-sent to ARF key list

(48)

12/14/87

Dear Arab American Republican,

[1] The saga of the Michigan Republican Party's precinct delegate process took several new turns this past week. The week began with a ruling by a Michigan county court judge who held that 1,200 party leaders should be allowed to participate in the process, overturning a decision by the Party's central committee not to allow the leaders to join the other 9,000 delegates already elected at county and district caucuses on Jan. 14th.

This was followed by the defection of two of Rep. Jack Kemp's state cochairmen to the Bush camp. The cochairman came out in opposition to the proposed rules change to barred the 1,200 GOP party leaders, largely supporters of Vice President Bush, reviving Bush's chances for an outright victory in Michigan.

But the picture became even more muddled when the proposed rules change passed anyway, followed by promises on both sides to continue the fight. A Washington Post article outlining some of these events is enclosed.

[2] Shortly after the 1984 election, political writers began noting that 1988 could see the end of the Reagan coalition. The President, the argument goes, is the one unifying force that could hold the various elements of the Party together and with his departure from the scene will follow the disintegration of the party into warring factions.

This is visible today in the presidential contests in Michigan, Iowa and in much of the behind the scenes operations of the various campaigns. Whether this disension is just part of the impassioned debate and brouhaha that is a feature of the primary process or a microcosm of the more threatening divisions that could splinter the Party and with it the Party's hopes for victory in 1988 remains to be seen. "Kemp and the Cons" and "Those Fractious Republicans" takes a look at this problem and tries to provide some answers to where the Party is headed.

[3] A full election preview of Arab American participation in the 1988 elections will follow in the next report.

I would like to wish both you and your families the very best for the holidays and a joyous New Year.

Best wishes,

Charles Zogby

919 16th Street NW • Suite 501 • Washington, D.C. 20006 • (202) 429-9210

Clubs: Chicago, Cleveland, Detroit, Flint, Houston, Knoxville, Orange County Calif., Philadelphia, San Francisco, West Hempstead, Yonkers, Washington, D.C.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 19, 1990

RECEIVED
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SENSITIVE

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble *[Signature]*
General Counsel

SUBJECT: MUR 2767
Arab American Institute, Inc.

I. BACKGROUND

The Arab American Institute, Inc. ("AAI") was notified by letter on November 27, 1990, that the Commission had found reason to believe that it had violated 2 U.S.C. §§ 441b(a) and 441d(a). Interrogatories and requests for production of documents accompanied that notification letter.

The respondent's reply to discovery requests was originally due on December 12, 1990. Counsel for respondent requested and received an extension until January 3, 1991 (Attachment I). The respondent has now obtained new counsel, who requests an additional 11-day extension until January 14, 1991 (Attachment II). Because such an extension would exceed 30 days past the original due date, Commission action is required to grant that extension.

It is the position of this Office that such an extension is appropriate. New counsel states he did not fully benefit from the previous extension in analyzing this complex matter. Furthermore, he states that the holiday season inhibits the availability of informed individuals and diminishes the amount of time in which to produce a response. Accordingly, this Office recommends that the Commission grant the requested extension.

II. RECOMMENDATIONS

1. Grant the Arab American Institute, Inc. an additional 11-day period within which to respond to the Commission's interrogatories and discovery requests.
2. Approve the appropriate letter.

Attachments

1. First Extension
2. Second extension request

Staff Member: J. Albert Brown

93043501427



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *JOB*
DATE: December 19, 1990
SUBJECT: MUR 2767 - Memo to the Commission

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

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48 Hour Daily Vote
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XX
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Compliance
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24 Hour No Objection
Sensitive
Non-Sensitive

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Litigation
Closed MUR Letters

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[]

Information
Sensitive
Non-Sensitive

[]

Status Sheets
Advisory Opinions

[]

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Extension of Time
Exception

[]

Other (see distribution
below)

[]

Other

93043501428

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2767
Arab American Institute, Inc.)

CERTIFICATION

I, Marjorie W. Emmons Secretary of the Federal Election Commission, do hereby certify that on December 21, 1990, the Commission decided by a vote of 5-0 to take the following actions in MUR 2767:

1. Grant the Arab American Institute, Inc. an additional 11-day period within which to respond to the Commission's interrogatories and discovery requests.
2. Approve the appropriate letter, as recommended in the General Counsel's Memorandum dated December 19, 1990.

Commissioners Aikens, Elliott, Josefiak, McGarry and Thomas voted affirmatively for the decision; Commissioner McDonald did not cast a vote.

Attest:

12-21-90

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Wed., December 19, 1990 11:26 a.m.
Circulated to the Commission: Wed., December 21, 1990 4:00 p.m.
Deadline for vote: Fri., December 21, 1990 4:00 p.m.

dh

93043501429



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 28, 1990

Edward S. Knight, Esquire
Akin, Gump, Strauss, Hauer & Feld
1333 New Hampshire Avenue, N.W.
Suite 400
Washington, D.C.
20036

RE: MUR 2767
Arab American Institute, Inc.

Dear Mr. Knight:

This is in response to your letter of December 11, 1990, requesting an extension until January 14, 1991, to respond to the interrogatories and discovery requests in this matter. After considering the circumstances presented in your letter, the Commission has granted the requested extension. Accordingly your response is due by the close of business on January 14, 1991.

If you have any questions, please contact Jim Brown, the attorney handling this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: *Lois G. Lerner* (SEK)
Associate General Counsel

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JOHN NICHOLAS PARKER

January 3, 1991

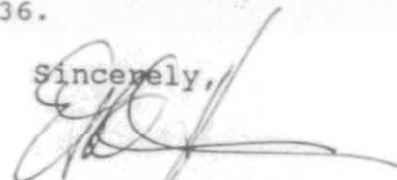
Mr. Jim Brown
Federal Election Commission
999 E Street, N.W.
6th Floor
Washington, D.C. 20463

Dear Mr. Brown:

Following our telephone conversation, I am requesting an extension until January 18, 1991 for John Parker to reply to MUR 2767. He is out of the city and asked me to tell you he will be back from travel on the 11th of January, 1991. This extension will afford him time to prepare his response.

Thank you for your time and kind attention to this matter. If I can be of any further assistance, please call me at 862-1336.

Sincerely,



Ethel Hammer
Assistant to John Parker

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 8, 1991

John N. Parker, Esq.
c/o Ethel Hammer
1100 Connecticut Avenue, N.W.
Washington, D.C. 20036

RE: MUR 2767
-Greek Americans for Bush
-William G. Chirgotis

Dear Mr. Parker:

This is in response to your assistant's request of January 3, 1991, which we received on January 3, 1991, for a second extension in responding to the Commission findings in the above matter. Your assistant, Ms. Hammer, has earlier stated that your office received the letter outlining the Commission's findings on December 4, 1990. After considering the circumstances presented by your assistant over the phone and in her letter, I have granted a second extension. Accordingly, your response is due by the close of business on January 18, 1991.

If you have any questions, please contact Jim Brown, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in dark ink, appearing to read "Lisa E. Klein", is written over the typed name of the Assistant General Counsel.

BY: Lisa E. Klein
Assistant General Counsel

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AKIN, GUMP, STRAUSS, HAUER & FELD

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WRITER'S DIRECT DIAL NUMBER (202) 887-4135

January 14, 1991

BY MESSENGER

The Honorable John Warren McGarry
Chairman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2767

Dear Chairman McGarry:

On behalf of the Arab American Institute, Inc. ("AAI"), we submit herewith responses to the Federal Election Commission's ("FEC") interrogatories and request for document production of November 27, 1990, along with a response to the FEC's "Factual and Legal Analysis" of that same date.

Should you have any questions concerning this matter, please do not hesitate to call.

Sincerely,

Edward S. Knight

Edward S. Knight
William J. Farah by WJF.
Counsel

Enclosures

cc: Jim Brown, Esq.
Office of General Counsel

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RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

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BEFORE THE
FEDERAL ELECTION COMMISSION

In the Matter of
the Arab American Institute, Inc.
and James Zogby, as Executive Director
918 16th Street, N.W., Suite 501
Washington, D.C. 20006,

MUR 2767

Respondents.

RESPONSE TO FEC FACTUAL AND LEGAL ANALYSIS

Introduction

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The Arab American Institute, Inc. ("AAI") was notified by the Federal Election Commission ("FEC" or "Commission") by letter dated November 27, 1990, that there was reason to believe that AAI had violated provisions of the Federal Election Campaign Act of 1971, as amended ("Act"). The Commission's letter included interrogatories and a request for the production of documents concerning AAI's organization and operations and its relationship with the Arab American Republican Federation ("AARF") and the Arab American Democratic Federation ("AADF"), the former being the initial subject of this "Matter Under Review ("MUR").

By its attorneys, AAI's response to the FEC's interrogatories and document requests are attached. Further by its attorneys, AAI submits this response to the FEC's "Factual and Legal Analysis" to demonstrate why no further action is necessary or appropriate in this matter.

Summary

In essence, we read the Factual and Legal Analysis supplied by the FEC to suggest the following: (1) that AAI was

inextricably linked to AARF and, therefore, responsible for any of the alleged violations of the Act committed by AARF and/or that AARF was a separate segregated fund (SSF) for AAI; and (2) that AAI made an impermissible corporate in-kind contribution to the Bush-Quayle '88 Committee by paying one of its employees, Charles Zogby, a salary at the same time that that employee engaged in volunteer activities on behalf of the Committee.

In fact, AAI was not inextricably linked to AARF, but rather it was a separate entity, which had no involvement in the two mailings for which AARF has been and is being investigated by the FEC. Moreover, AARF was not an SSF for AAI.

With regard to the alleged corporate in-kind contribution, the work relationship between Charles Zogby and AAI was structured in such a way that no contribution to Bush-Quayle '88 resulted. Although Charles Zogby may have missed some time from work that may not have been made-up totally consistent with the Commission's regulation governing voluntary activities, any such time overall was de minimis and would have been the result of a change in Charles Zogby's employment circumstances (i.e., Charles Zogby left AAI for a new job). Accordingly, no significant impermissible corporate contribution resulted.

Background

This MUR was initiated by a complaint filed against the Bush-Quayle '88 Committee and AARF on the morning of Friday, November 4, 1988 (five days before the presidential election), by the Dukakis/Bentsen Committee, Inc. Relying on a news article

appearing in the New York Times, the complaint stated that on October 19, 1988, AARF "mailed material to numerous individuals expressly advocating the election of George Bush as President." See Dukakis/Bentsen Committee Complaint.

Based thereon, the Commission determined that there was reason to believe that AARF "may have expended more than \$1,000 in connection with the mailing ... [and that] in view of the organization's partisan political nature, it is possible that its other activities may have triggered an obligation to register and report as a political committee." FEC Factual and Legal Analysis p.2 (June 1, 1989). The FEC also issued a subpoena and order for written answers to questions and for the deposition of Charles Zogby, the secretary of AARF and a signatory of the October 19th letter.

More than one year after AARF had complied with all orders and requests by the FEC,^{1/} the Commission issued a supplemental finding of reason to believe that AARF may have violated the Act. The FEC therein asserts that AARF made impermissible coordinated expenditures on behalf of Bush-Quayle '88 by paying for the October 19, 1988 mailing^{2/} and implies that AARF violated the Act by its involvement with a January 4, 1988 mailing by "Arab

^{1/} AARF's response to the questions were filed with the Commission on June 28, 1989 and Charles Zogby was deposed on August 9, 1989.

^{2/} AARF has stated that the cost for the October 19, 1988 mailing was \$537.52. See AARF Response to FEC Interrogatories, Question 1(c) (June 28, 1989).

Americans for Bush."^{3/} See Letter from Chairman Elliott to Richard Mayberry (Nov. 27, 1990)

At the same time, the FEC named AAI and its Executive Director, Dr. James Zogby, as respondents in the MUR, stating that "AARF seems to be the political arm of AAI and may have functioned as the corporation's separate segregated fund,"^{4/} FEC Factual and Legal Analysis p. 4 (Nov. 27, 1990), and alleging that AAI had paid the salary of an employee for performing duties for Bush-Quayle '88, see id. at 16. The FEC's Factual and Legal Analysis also names and discusses AAI jointly with AARF, suggesting that AAI should be held responsible for any violations of the Act committed by AARF. Id. at 16-17

Discussion

1. AAI was a separate entity from AARF.

AAI was a separate, distinct entity from AARF. AAI was a nonprofit corporation under section 501(c)(4) of the Internal Revenue Code that served as a training institute servicing Arab American communities in areas of political and civic advancement. The purpose of AAI was to provide information and training to Americans of Arab descent in order to promote their participation

^{3/} Shortly thereafter, upon learning of the circumstances of the mailing (and prior to the FEC's investigation of the matter), the Bush Presidential Primary Committee reimbursed AARF for the expenditures inadvertently made in connection with the January 4th mailing (\$1,988.26).

^{4/} The FEC names AAI jointly with AARF throughout its Factual and Legal Analysis (i.e., AAI/AARF) and with regard to all allegations, suggesting that the two entities are one for purposes of any violations.

in the American political process. During the time at issue, AAI was controlled by a Board of Directors, none of whom were serving in a similar capacity for AARF. AAI had a full-time staff of 12 and employed part-time field coordinators in key states.

AARF, by contrast, was an unincorporated association formed by local Arab American Republican clubs, which paid membership dues to support AARF. AARF was controlled by an executive board elected by association members. As indicated above, no member of AARF's executive board served on AAI's board of directors. The purpose of AARF was to represent its member clubs before the Republican party's national ethnic outreach body, the National Republican Heritage Groups Council, providing information about member clubs and reporting to its member clubs information concerning national politics. Thus, AARF was a liaison between the Republican party and AARF member clubs. AARF had no employees, relying on volunteers and minimal staff support provided by AAI (and for which AARF was billed).

The FEC's belief that the separateness of AAI and AARF should be disregarded appears founded on the following: (1) AAI and AARF have the same address, phone number and share office space and one overlapping worker; (2) "AAI and AARF have virtually indistinguishable goals: to encourage Arab Americans to become politically active"; and (3) AAI assists AARF. Factual and Legal Analysis, p. 3-4 (Nov. 27, 1990). Based thereon, the FEC's Legal and Factual Analysis concludes "it would appear that AAI and AARF are inextricably connected. AARF seems

to be the political arm of AAI and may have functioned as the corporation's separate segregated fund." Id. at 4.

We now address each of these statements. (1) Although AARF shared office space with AAI and office equipment, AARF maintained separate files, bank account, mailing lists and was accountable to AAI for use of phone, postage machine and printing costs, which are all logged separately and billed to AARF. Moreover, AAI billed AARF for a portion of overhead expenses as well as for any AAI staff support utilized for AARF purposes.

The one overlapping "employee" to whom the FEC's Factual and Legal Analysis refers is Charles Zogby, who was employed by AAI as an "organizing assistant." In fact, Charles Zogby was not an employee of AARF. Only a relatively small percentage of his time was spent on the administrative needs of AARF (logging dues remittances and facilitating mailings) and AARF was billed for this time by AAI. Independent from his employment with AAI, Charles Zogby served as Secretary for AARF in his personal, voluntary capacity.

Charles Zogby's position with AAI was not managerial or policy-oriented. As organizing assistant, his duties included community organizing services (communicating information to volunteers, facilitating mailings and writing-up reports about activities sponsored by Arab Americans) and administrative tasks (in-taking direct mail responses, logging poll or questionnaire results, filing, data entry and word processing). Absent any policy-making or managerial involvement or authority at AAI,

Charles Zogby was in no position to exercise control over or coordinate policies or decision-making between either entity on behalf of the other.

(2) The FEC states that AAI and AARF had "virtually indistinguishable" goals, i.e. to encourage Arab Americans to become politically active. AAI and AARF's goals were similar but not indistinguishable. AAI sought to accomplish increased political participation generally, whereas AARF sought to act as liaison for its member Republican clubs to the Republican national party organization and in this way enhance their participation in American politics. Though this objective may be consistent with AAI's goal to encourage Arab Americans in becoming politically active, it is not "virtually indistinguishable."

Moreover, limiting the separateness of entities where a commonality of purpose exists raises serious public policy concerns. Although a commonality of purpose sometimes may be significant in cases involving the separateness of business entities, having a mere common goal should not operate to defeat the separateness of nonprofit entities (either corporate or unincorporated associations). To do so would have a chilling effect on groups that engage in free expression, limiting their capacity to associate freely. In addition, the liability concerns resulting from such a policy (uncertainty when an entity's separateness might be disregarded) would be a

disincentive to individuals otherwise interested in participating in ideological organizations.

(3) As indicated in (1), AAI dealt with AARF at arm's length, billing it for office rent, its use of office facilities, staff support and administrative overhead. In any event, it seems completely consistent with the purposes of a nonprofit training institute like AAI to provide assistance to other entities where that assistance will have the effect of encouraging greater Arab American political participation. To hold AAI liable for acts by entities it may assist would prevent AAI from accomplishing its purposes, which are lawful and indeed encouraged by the tax code.

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Interestingly, the Factual and Legal Analysis failed to address the issue of control in its assertion that the separateness of AAI and AARF should be disregarded. AAI and AARF had separate controlling bodies. No member of AAI's board served on AARF's executive board. The one purported link between the two entities, Charles Zogby, was in no position to exert control over or coordinate policy or decision-making of one entity on behalf of the other.

In sum, AAI in virtually every respect maintained its separateness from AARF. The two entities maintained separate records, bank accounts, and dealt with each other at arm's length. Moreover, there is no indication that either AAI or AARF was subject to control by the other.

2. AARF is not a separate segregated fund of AAI

The FEC suggests that AARF may have functioned as AAI's separate segregated fund ("SSF"). See Factual and Legal Analysis p. 4 (Nov. 27, 1990). This is not possible since AAI is not a "connected organization" within the meaning of the Act.^{5/}

SSF's are political committees that are organized and controlled by corporations, labor unions, trade associations, or incorporated membership organizations. Specifically, the Commission's regulations define a connected organization as "any organization ... which directly or indirectly establishes, administers, or financially supports a political committee." 11 C.F.R. § 100.6(a) (1990).

As indicated above, AAI had no control over AARF. All decision-making concerning AARF was vested in its executive board, none of whom had similar positions with AAI or were controlled by AAI. Thus, AAI did not control or administer AARF. Furthermore, AAI did not establish AARF, it was formed by local Republican clubs. Finally, AAI did not financially support AARF. As stated above, AAI billed AARF for its share of office expenses and generally dealt with AARF at arm's length. Since AAI did not

^{5/} Moreover, AAI understands (and has no reason to believe otherwise) that AARF is not a political committee. As previously stated, AARF's purpose is to act as liaison between local Arab American Republican clubs and the National Republican Heritage Groups Council. It is not a purpose of AARF to engage in activities to influence federal elections. Where there is no political committee, obviously there can be no connected organization.

organize or control AARF, it could not have been a connected organization to that entity.

3. AAI made no in-kind contribution to Bush-Quayle '88

The FEC believes that AAI made an impermissible in-kind corporate contribution to Bush-Quayle '88 by paying the salary of one of its employees, Charles Zogby, during a time that he was a non-salaried worker for Bush-Quayle '88. Specifically, the FEC's Factual and Legal Analysis states that Charles Zogby worked 35 hours a week or more as a volunteer for the campaign while working full-time for AAI and attending law school at night. See FEC Factual and Legal Analysis, p. 4-5, 16 (Nov. 27, 1990) Based thereon, the FEC found reason to believe that AAI violated the statutory prohibition against corporate contributions.

The Act expressly prohibits corporations from using corporate treasury funds to make federal contributions. See 2 U.S.C. § 441b(a) (1988). The term contribution includes "[t]he payment by any person of compensation for the personal services of another person if those services are rendered without charge to a political committee ..." 2 U.S.C. § 431(8)(A)(ii) 11 C.F.R. § 100.7(a)(3). Thus, where an individual is compensated by an employer for providing services to a candidate, an in-kind contribution ordinarily will result from the employer to the political committee.

The value of services provided to a candidate committee by an uncompensated volunteer, however, does not result in a contribution. See 2 U.S.C. § 431(8)(B)(i); 11 C.F.R.

§ 100.7(b)(3). In order for such services to qualify as voluntary, "the service must be rendered during time that is the individual's own to spend as he/she sees fit." R. Bauer, United States Federal Election Law 2-44 (1984). Furthermore, Commission regulations provide that

If an employee is paid on an hourly or salaried basis and is expected to work a particular number of hours per period, no contribution results if the employee engages in political activity during what would otherwise be a regular work period, provided that the taken or released time is made up or completed by the employee within a reasonable time.

11 C.F.R. § 100.7(a)(3)(i) (emphasis added).

In the case at issue, no significant in-kind contribution resulted from AAI paying Charles Zogby's salary because he performed much of his work for Bush-Quayle '88 on his own time and made-up most, if not all, of any time missed from AAI.

The FEC's Factual and Legal Analysis states that Charles Zogby was a volunteer for Bush-Quayle '88, working 35+ hours a week. It fails to note, however, that the period during which Charles Zogby worked 35+ hours for Bush-Quayle '88 was limited to the period of July-October 1988 (four months). See Deposition of Charles Zogby p. 16-17 (Aug. 9, 1989). The FEC also states that Charles Zogby was attending night law school while he worked for Bush-Quayle. The record does not reflect, however, that although Charles Zogby was a third-year night law student (part-time) during the period in question, he took no classes that summer. Thus, for the months of July and almost all of August, Charles

Zogby was working at AAI and for Bush-Quayle '88 but had no law school obligations. Moreover, it is our understanding that Charles Zogby's attention to his law school classes may have suffered as a result of his volunteer work for Bush-Quayle '88 during September and October 1988

Charles Zogby's position with AAI was "organizing assistant." His duties included community organizing services^{6/} and administrative tasks.^{7/} His salary for 1988 was \$21,000. For this compensation ordinarily he worked approximately 32-35 hours a week. Given the nature of his duties, it was not critical for him to be at AAI at any particular time(s) to do his work. Accordingly, AAI did not object to Charles Zogby performing volunteer activities during normal working hours, provided he agreed to make-up any missed time by coming in at other times.^{8/}

During the months of July and August 1988, Charles Zogby worked approximately 30 hours a week for AAI (which was only a fraction less than his pre-campaign work schedule). For the months of September and October 1988 his hours at AAI fell to

^{6/} For a description of community organizing services, see supra p. 6.

^{7/} For a description of administrative tasks, see supra p.6.

^{8/} We note that, when AAI agreed to allow Charles Zogby to perform some campaign work during regular work hours if he made-up that time, the Institute was not even aware that the Act was implicated. Rather, it insisted that Charles Zogby make-up any missed time to be certain it continued to get its work due from Charles Zogby. AAI had no intention of directly or indirectly providing any benefit to Bush-Quayle '88 when it agreed to allow Charles Zogby to make-up any missed time.

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approximately 10 hours a week, however, he continued to come to AAI every day and work.

To compensate for this reduction in work-hours, AAI required Charles Zogby to make-up any missed time, and he agreed to work "extra" time (without pay) for AAI starting in November until the missed time had been made-up. As agreed, starting in November and continuing through December 1988, Charles Zogby worked extra time for AAI, 50+ hours a week. During November and December 1988, in addition to performing his ordinary duties and responsibilities, he worked-on at least two lengthy studies/reports for AAI.

In early January 1989, Charles Zogby was offered another position at a higher salary and left AAI.^{9/} Upon reflection, AAI believes that the work done by Charles Zogby in November and December was sufficient to make-up for any time he missed in September and October.

The FEC's Factual and Legal Analysis assumes that between working for AAI and Bush-Quayle '88 and going to law school at night, something had to give and that "give" must have been at the expense of AAI. This was not the case. The FEC's analysis fails to take into consideration that: (1) Charles Zogby had no law classes to attend for July and August 1988; (2) Charles Zogby's position at AAI was chiefly ministerial and not overly demanding as indicated by his relatively low salary (particularly

^{9/} We note that, although had been an employee of AAI for nearly four years, he was not given severance pay.

by Washington, D.C. standards); and (3) Charles Zogby made-up most, if not all, of any time missed from AAI by working extra time in November and December 1988 for AAI.

In sum, Charles Zogby continued to work a relatively full-time schedule for AAI during the months of July-October 1988 (he was not attending law school at that time), and made-up most, if not all, of any missed time by working extra time for AAI in November and December 1988. Commission regulations allow for employees to make-up missed time within a reasonable period. See 11 C.F.R. § 100.7(a)(3)(i). This Charles Zogby did. To the extent that all of the time was not made-up (and it is unclear to AAI whether Charles Zogby failed to make-up all of the time), such amount of time was de minimis and was a consequence of events uncontrollable by AAI (Charles Zogby's departure). Given the small amount of time that potentially was not made-up and the absence of any intent by AAI or Charles Zogby to violate or in any way attempt to circumvent either the letter or the spirit of the Act, no corporate contribution from AAI to Bush-Quayle '88 should be deemed to have resulted.

4. The FEC's actions in this MUR raise certain public policy concerns

It is becoming increasingly frequent for campaigns to use the FEC process as a tactic to gain political advantages over opponents. We understand that the FEC cannot prevent such conduct. Nonetheless, the FEC can discourage such conduct by exercising additional restraint and careful scrutiny before

proceeding with an investigation where there is a substantial likelihood that the complaint is intended merely as an attempt to gain media attention, intimidate or raise concern for some segment of society or to consume the staff and legal resources of a political opponent. Failure to exercise additional caution in these cases simply encourages campaigns to file complaints when there is the smallest perception that their opponent may have violated any technical provision of the Act.

This MUR is an excellent case in point. The complaint filed by the Dukakis/Bentsen Committee was filed the Friday before national elections and immediately after an article appeared in the New York Times reporting the facts on which the complaint was based. The timing of the complaint makes the immediate objectives self-evident.^{10/}

Yet the Commission's willingness to aggressively pursue, indeed broaden, this investigation now involving two relatively small ethnic organizations is perplexing in view of the relatively small sums at issue and the ambiguity with regard to the facts that existed at the time the Commission found reason to believe violations of the Act may have occurred. Rather than acting with additional restraint and caution, the Commission here has rewarded the complainant beyond its expectations with a two-year investigation filled with interrogatories, a deposition,

^{10/} With respect to timing, we note with interest and some concern that this MUR is being advanced at a time when political affairs in the Middle East make the ethnic groups represented by the organizations subject to this investigation particularly vulnerable.

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additional allegations and still more interrogatories.^{11/} And the facts demonstrate that this full-scale investigation has revealed no more than two isolated instances of inadvertent mailings, one of which was discovered and remedied prior to the FEC's involvement.^{12/} The Commission should use its discretion in these matters by adopting an approach that will minimize it becoming an inadvertent party to campaigns' public relations strategies.

A second public policy concern is with regard to the Commission's investigative approach to ethnic groups, like AARF and AAI. The primary purpose of the Federal Election Campaign Act was to limit the actuality and appearance of corruption resulting from large financial contributions and thereby encourage increased participation by all Americans in the political process.

The Commission should remain cognizant that subjecting non-business, relatively small ethnic groups to full-scale investigations defeats this purpose. In addition to the financial costs to the organizations, the investigation has real chilling effects on the individuals belonging to those groups as well as those who might otherwise consider becoming involved in our election process. The need for ethnic political

^{11/} It is our understanding that the Commission rejected AARF's plea to enter into conciliation discussions. See Letter from Lawrence Noble to Richard Mayberry (Nov. 21, 1989).

^{12/} We refer here to the January 4, 1988 mailing, the cost for which was reimbursed by Bush-Quayle '88 after learning thereof.

organizations often arises from the fact that these groups believe they are not welcome to participate in American politics. An FEC investigation may very well appear to confirm this belief -- particularly when the sums at issue are relatively small.

The FEC process should not discourage increased ethnic participation in elections. Rather, the process should seek to encourage increased participation as a means to offset the business and labor concerns that currently dominate campaign finance. To accomplish this, the Commission should look with disfavor on any action having anti-ethnic effects. This is not to suggest that the Commission should "look the other way." But the Commission may use its discretion and good sense to require a real likelihood that a substantial violation of the law has occurred before taking action.

Conclusion

We believe this response demonstrates that AAI is a separate, distinct entity from AARF and that AAI is not a "connected organization" within the meaning of the Federal Election Campaign Act. Furthermore, we have shown how Charles Zogby's volunteer work for Bush-Quayle '88 was performed on his own time or was made-up within a reasonable period.

Since AAI is a separate, distinct entity and not a connected organization, it should not be held liable for any allegations leveled against AARF for inappropriate mailings. In addition, since Charles Zogby's work for Bush-Quayle '88 was voluntary, AAI

did not make an impermissible corporate in-kind contribution by paying him his regular salary during the period in question.

Respectfully submitted by:

ARAB AMERICAN INSTITUTE, INC.

By its counsel

Edward S Knight

Edward S. Knight
William J. Farah

by W.J.F.

on JANUARY 14, 1991

AKIN, GUMP, STRAUSS, HAUER & FELD
1333 New Hampshire Ave., N.W.
Suite 400
Washington, D.C. 20036
202/887-4135

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BEFORE THE
FEDERAL ELECTION COMMISSION

In the Matter of
the Arab American Institute, Inc.
and James Zogby, as Executive Director
918 16th Street, N.W., Suite 501
Washington, D.C. 20006,

MUR 2767

Respondents.

RESPONSE TO FEC INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS

By its attorneys, the Arab American Institute, Inc., submits these responses to the FEC's interrogatories and request for production of documents.

Question 1.

The purpose of the Arab American Institute ("AAI") is to provide information and training to Americans of Arab descent to promote participation in the American political process. Among AAI's goals are increased voter participation through voter registration and education projects; increased access and involvement with local and state government and party structures; leadership training in campaign/election skills; increased understanding of local government and developing political coalitions; and providing policy research and information on issues of concern to Arab Americans.

Question 2.

AAI has no written policy against accepting financial support from corporations or labor organizations.

Question 3.

AAI is incorporated as a nonprofit organization under section 501(c)(4) of the Internal Revenue Code.

Question 4.

Provided (Tab A).

Question 5.

The AAI is a nonprofit corporation structured as a national training institute servicing Arab American communities in areas of political and civic advancement. It has a full time staff of 12 and employs part-time field coordinators in key states. It has no membership but maintains a base of Arab American community leaders and supporters who receive publications and invitations to local and national events.

The Arab American Republican Federation (AARF) is an unincorporated association representing a national network of localized Arab American Republican clubs and committees and individual Arab American Republican activists. The AARF's structure consists primarily of member clubs located in some 12 cities, whereby members of local clubs became members of the national federation by payment of annual dues. Individuals are

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also invited to join the Federation if there is no club in their area; the total Federation membership by 1988 numbered close to 900.

The AARF serves to represent the Arab American constituency in the Republican party's national ethnic outreach body, the National Republican Heritage Groups Council. The leadership of the Federation consists of an executive committee elected from among the leadership of the local member clubs. The AARF, having no employees, depends upon the volunteer services of its club leaders and utilizes minimal support services of the Arab American Institute, whose office mailing address and phone number it shares.

(b) The board of directors of AAI is identified below:

James J. Zogby (President)
6319 Western Avenue, NW
Washington, DC 20015
(202) 429-9210

John Zogby
1518 Genesee Street
3rd Floor
Utica, NY 13502
(315) 738-0617

George R. Salem*
6611 Heidi Court
McLean, VA 22101
(202) 887-4000

Jean R. AbiNader (Treasurer)
3615 Taylor St.
Chevy Chase, MD 20815
(202) 331-8010

Helen H. Samhan (Secretary)
6333 Lakewood Drive
Falls Church, VA 22041
Office: (202) 429-9210

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- * George Salem resigned from the Board upon his inception of service with the federal government (April 1985-January 1989).

A list of the employees of AAI for the period in question is provided in response to Question 4(b) (Tab A) (AAI Organizational Chart).

The most recent executive board for AARF was elected in May 1986 and reinstated in March of 1987. The names of these individuals are follows:

Nader Sayegh -- Chairman
Nizar Jwaideh -- Vice Chair (deceased)
Ray Baroud -- Correspondence Secretary
Charles Zogby -- Secretary
Mounzer Chaarani -- Treasurer

As previously noted, AARF has no employees.

(c) The AAI and AARF maintain separate bank accounts. AAI maintains two accounts at American Security Bank, 1612 K Street, N.W., Washington, D.C. AARF also has a checking account at American Security Bank, 1612 K Street, N.W., Washington, D.C.

(d) The AARF shares office space with AAI at 918 16th Street, N.W., Suite 601, Washington, D.C. 20006. AARF maintains separate files, bank account, mailing list, and is accountable to AAI for use of phone, postage machine, and printing costs, which are all logged separately and billed to the Federation. The Federation also is billed for a portion of overhead expenses as well as staff support utilized for Federation purposes.

Question 6.

Attached are copies of 1987 and 1988 invoices submitted to the AARF at the end of each calendar year to cover expenses reimbursable to AAI (Tab B).

Question 7.

(a) The structure of the Arab American Democratic Federation ("AADF") is the same model as that of the AARF. It represents local Arab American Democratic clubs in some 17 states and has a membership numbering some 1700, consisting of members of local clubs and individuals interested in the Democratic party. Like the AARF, the AADF depends on the volunteer efforts of its club leaders and activists.

(b) The most recent election of AADF's executive board took place in 1987, and a list of those individuals is attached (Tab C).

(c) The AADF maintains a checking account at American Security Bank, 1612 K Street, N.W., Washington, D.C. 20006.

(d) Like the AARF, the AADF shares a mailing address and phone number with AAI. Separation procedures between the two organizations are the same as those outlined with respect to AARF in response to question 5(d).

Question 8.

AAI made no mailings that advocated or supported the election or defeat of George Bush for President.

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AARF and AADF are best qualified to speak to their respective uses of lists for any mailings advocating or supporting the election or defeat of George Bush for President. To the best of AAI's knowledge, AADF made no mailings which advocated or supported the election or defeat of George Bush for President. Furthermore, other than the two mailings the FEC has identified and attributed to AARF in this MUR (the January 4th and October 19th mailings), AAI is not aware of any instances where AARF made use of lists for mailings advocating or supporting the election or defeat of George Bush for President. With respect to those two instances identified by the FEC, AAI understands that the January 4, 1988 mailing that was prepared by Charles Zogby on behalf of "Arab Americans for George Bush" utilized the membership list of the AARF (888 names), and that the October 19, 1988 "get-out-the-vote" mailing by the AARF utilized the membership list of AARF as well as an AARF list identifying Arab Americans who supported the Reagan-Bush campaign in 1984.

Question 9.

Charles Zogby was an employee of the Arab American Institute since 1985. His position at AAI was "organizing assistant." His duties included (1) community organizing services, involving contact with our volunteer leadership base in cities around the country, informing them of AAI projects, facilitating mailings about local events, and writing-up reports about activities

sponsored by Arab Americans working in local politics, etc.; and (2) administrative tasks, such as the intake procedures for direct mail responses, logging of poll or questionnaire results, filing, data entry and word processing. Only a relatively small percentage of his time was spent on administrative needs of the AARF and AADF, such as logging dues remittances and facilitating mailings, time for which the federations were billed at the end of the calendar year. His salary for 1988 was \$21,000.

(a) As noted above, during the period in question, Charles Zogby was an employee of AAI at an annual salary of \$21,000. During the months of July and August 1988, Charles Zogby worked approximately 30 hours a week for AAI (which was only a fraction less than his pre-campaign work schedule). For the months of September and October 1988, his hours at AAI fell to approximately 10 hours a week, however, he continued to come to AAI every day and work.

To compensate for this reduction in work-hours, AAI required Charles Zogby to make-up any missed time, and he agreed to work "extra" time (without pay) for AAI starting in November 1988 until any missed time had been made-up. As agreed, starting in November and continuing through December 1988, Charles Zogby worked extra time for AAI, 50+ hours or more a week. In January 1989, Charles Zogby left AAI for another position.

Question 11.

Although AARF is best qualified to address this question, AAI understands that those individuals who supervised or assisted in the mailings were as follows:

- (1) The January 1988 mailing on behalf of "Arab Americans for George Bush" was prepared by Charles Zogby.
- (2) The October 1988 AARF mailing was prepared by Mike Sarafa, who was working on an internship with AAI

Question 12.

No AAI facilities were used for the "Arab Americans for George Bush" mailing.

An AAI computer was used to type the drafts of the cover letter in the AARF membership mailing of October 1988.

Question 13.

The mailing in question was printed and mailed by International Graphics Printing Service of Brentwood, Maryland; labels were provided by MacSystems. Copies of invoices and cancelled checks are attached (Tab D).

Question 14.

No funds were placed in an AAI account.

Question 15.

Contacts between AAI and the George Bush campaign were limited to a request during the primary season for the candidate's stated position on Middle East-related issues, a request sent to all candidates of both political parties.

Respectfully submitted by:

ARAB AMERICAN INSTITUTE, INC.

By its counsel:

Edward S. Knight

Edward S. Knight
William J. Farah

by W.J.F.

On JANUARY 14, 1991

AKIN, GUMP, STRAUSS, HAUER & FELD
1333 New Hampshire Ave., N.W.
Suite 400
Washington, D.C. 20036
202/887-4135

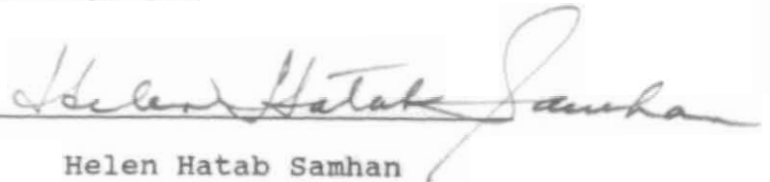
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DECLARATION

I, Helen Hatab Samhan, do hereby declare, under penalty of perjury that:

1. I am Deputy Director of the Arab American Institute.
2. I have read the foregoing answers to interrogatories.

I hereby attest that the information stated therein is true and correct to the best of my knowledge and belief.


Helen Hatab Samhan

Date: Jan 14, 1991

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(A)

ARTICLES OF AMENDMENT
TO THE
ARTICLES OF INCORPORATION
OF
THE ARAB AMERICAN INSTITUTE

TO: The Recorder of Deeds, D.C.
Washington, D.C

Pursuant to the provisions of the District of Columbia Non-profit Corporation Act, the undersigned, on behalf of The Arab American Institute, a District of Columbia Nonprofit Corporation, does hereby consent and agree to the following Amendments to the Articles of Incorporation of The Arab American Institute, viz:

FIRST: The name of the Corporation is The Arab American Institute.

SECOND: The following amendments to the Articles of Incorporation were adopted by the Corporation in the manner prescribed by the District of Columbia Nonprofit Corporation Act:

Article THIRD of the Articles of Incorporation of The Arab American Institute is hereby amended in its entirety by deleting all of Article THIRD and placing in its stead the following:

"THIRD: The corporation is organized, and at all times shall be operated exclusively for the promotion of social welfare, more specifically the following:

"1. To promote, foster and encourage the participation of American citizens of Arab ethnic descent in American civic and political life.

"2. To educate and train American citizens of Arab ethnic descent in local, state, and national politics in an effort to foster increased awareness in the Arab American community of the means by which Arab Americans can participate effectively in American civic and political life.

"3. To promote, foster and encourage greater communication and understanding between Arab Americans and other American ethnic groups.

"4. To promote, foster and encourage any other similar social welfare activity.

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"5. To promote, foster and encourage charitable, educational or scientific activity having purposes consonant with those of the Corporation."

Article SIXTH of the Articles of Incorporation of The Arab American Institute is hereby amended in its entirety by deleting all of Article SIXTH and placing in its stead the following:

"SIXTH: In carrying out its purposes, the corporation shall not have or exercise any power or authority, nor engage directly or indirectly in any activity not permitted to be carried on by a corporation exempt from federal income tax under Section 501(c)(4) of the Internal Revenue Code of 1954. No part of the assets or earnings, current or accumulated, of the corporation shall at any time be distributed to or inure to the benefit of any individual, except that the Corporation shall be authorized and empowered to pay a reasonable allowance for authorized expenditures incurred on behalf of the Corporation, and to make payments and distributions in furtherance of the purposes set forth in Article THIRD hereof."

Article NINTH of the Articles of Incorporation of The Arab American Institute is hereby amended by inserting after the term:

"Section 501(c)(3)"

the term:

"or Section 501(c)(4)"

THIRD: The amendments were adopted by the unanimous written consent of the Directors.

September 3, 1985

(SEAL)

THE ARAB AMERICAN INSTITUTE

By: James J. Zogby
James J. Zogby, President

Attest: Helen Hatala Samson
Secretary or
Assistant Secretary

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS

Business Regulation Administration
Corporations Division
614 H Street, N.W.
Washington, D.C. 20001-2782



CERTIFICATE

THIS IS TO CERTIFY THAT ALL PROVISIONS OF THE DISTRICT OF COLUMBIA NON-PROFIT CORPORATION ACT
HAVE BEEN COMPLIED WITH AND ACCORDINGLY THIS CERTIFICATE OF Incorporation

IS HEREBY ISSUED TO THE THE APAB AMERICAN INSTITUTE

AS OF THE DATE HEREINAFTER MENTIONED.

DATE March 12, 1985

CAROL B. THOMPSON
Director

A handwritten signature in cursive script, reading "Miriam Hellen Jones".
Miriam Hellen Jones
Superintendent of Corporations

GOVERNMENT OF THE DISTRICT OF COLUMBIA
MARION BARRY, JR., MAYOR
REV. JANUARY 1985

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Articles of Incorporation
of
The Arab American Institute

We, the undersigned natural persons of the age of twenty-one years or more, acting as incorporators of a corporation, adopt the following Articles of Incorporation for such corporation pursuant to the provisions of the District of Columbia Nonprofit Corporation Act:

FIRST: The name of the corporation is the Arab American Institute.

SECOND: The corporation is to have perpetual existence.

THIRD: The corporation is organized, and at all times will be operated, exclusively for such educational, charitable and scientific purposes as will qualify it for exemption from federal income taxation under section 501(c)(3) of the Internal Revenue Code. Founded to promote full citizenship participation among Arab Americans, The Arab American Institute will by means of educational, research and organizational projects work for the advancement of Arab American leadership on all levels of U.S. society.

FOURTH: The corporation shall not have members.

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FIFTH: The corporation may exercise all power or authority granted to it under the District of Columbia Non-Profit Corporation Act or otherwise, including, but not limited to, the power to accept donations or money or property, and the power to own or lease property, real or personal.

SIXTH: In carrying out its purposes, the corporation shall not have or exercise any power or authority, nor engage directly or indirectly in any activity, that would prevent it from qualifying as a corporation described in section 501(c)(3) of the Internal Revenue Code of 1954. No part of the assets or earnings, current or accumulated, of the corporation shall at any time be distributed to or inure to the benefit of any private individual, within the meaning of the prohibition contained in section 501(c)(3) of the Internal Revenue Code of 1954, except that the corporation shall be authorized and empowered to pay a reasonable allowance for authorized expenditures incurred on behalf of the corporation, and to make payments and distributions in furtherance of the purposes set forth in paragraph THIRD of these Articles.

SEVENTH: Except as provided in section 501(h) of the Internal Revenue Code of 1954, no substantial part of the activities of the corporation shall be the carrying on of

propaganda or otherwise attempting to influence legislation.

EIGHTH: The affairs of the corporation shall be managed by a Board of Directors. Qualifications for membership on the Board of Directors shall be as provided in the By-laws of the Corporation. The number of members of the Board of Directors shall be fixed by the By-laws and may be increased or decreased from time to time as provided therein, but in no event shall the number of Directors be less than three. Each member of the Board of Directors shall be elected or appointed in the manner and for the term provided in the By-laws.

NINTH: Upon the termination, dissolution, or winding up of the corporation in any manner or for any reason, its assets, if any, remaining after payment or provision for payment of all liabilities of the corporation shall be distributed to, and only to, one or more organizations described in section 501(c)(3) of the Internal Revenue Code of 1954.

TENTH: The number of members of the initial Board of Directors shall be five. The names and addresses of the

members of the initial Board of Directors, who shall serve until the first annual meeting or until their successors are elected or appointed and qualified, are as follows:

James Zogby
6319 Western Ave. N.W.
Washington, D.C. 20015

Helen Samhan
918 16th St. N.W. Suite 501
Washington, D.C. 20006

Jean AbiNader
2008 R St. N.W.
Washington, D.C. 20036

John Zogby
18 Springate St.
Utica, New York 13502

George Salem
1730 Pennsylvania Ave. N.W.
Washington, D.C. 20006

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ELEVENTH: the private property of officers or members of the Board of Directors of the corporation shall not be subject to payment of corporation debts to any extent whatever.

TWELFTH: Any reference in these Articles to any provision of the Internal Revenue Code of 1954 shall be deemed to include the corresponding provision of any future United States Internal Revenue Law.

THIRTEENTH: The address, including street and number, of the corporation's initial registered office is 918 16th St. N.W., Suite 501, Washington D.C. 20006, and the name of its

initial registered agent at such address is James Zogby, a resident of the District of Columbia.

FOURTEENTH: The names and addresses of the incorporators are as follows;

James Zogby
918 16th St. N.W.
Suite 501
Washington, D.C. 20006

Robin Madrid
918 16th St. N.W.
Suite 501
Washington, D.C. 20006

Mark Dressler
918 16th St. N.W.
Suite 501
Washington, D.C. 20006

IN WITNESS WHEREOF, we have signed and acknowledged these Articles of Incorporation this ____ day of _____, 1985.

INCORPORATORS

James Zogby

Robin Madrid

City of Washington)
)
District of Columbia)

Mark Dressler

BYLAWS
of
Arab American Institute
(A District of Columbia Nonprofit Corporation)

Article I

MEMBERS

The Corporation will not have members.

Article II

PURPOSE

The purpose of the corporation shall be the promotion of social welfare, more specifically the following:

1. To promote, foster and encourage the participation of American citizens of Arab ethnic descent in American civic and political life.
2. To educate and train American citizens of Arab ethnic descent in local, state, and national politics in an effort to foster increased awareness in the Arab American community of the means by which Arab Americans can participate effectively in American civic and political life.
3. To promote, foster and encourage greater communication and understanding between Arab Americans and other American ethnic groups.

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4. To promote, foster and encourage any other similar social welfare activity.

5. To promote, foster and encourage charitable, educational or scientific activity having purposes consonant with those of the Corporation

Article III

PROHIBITED ACTIVITIES

1. The corporation shall not have nor exercise any power or authority, nor engage directly or indirectly in any activity not permitted to be carried out by a corporation exempt from federal income tax under Section 501(c)(4) of the Internal Revenue Code of 1954.

2. No part of the assets or earnings, current or accumulated, of the corporation shall at any time be distributed to or inure to the benefit of any individual, except that the corporation shall be authorized and empowered to pay reasonable compensation for services rendered, to pay a reasonable allowance for authorized expenditures incurred on behalf of the corporation, and to make payments and distributions in furtherance of its purposes.

3. Except as provided in Section 501(h) of the Internal Revenue Code of 1954, no substantial part of the activities of the corporation shall be the carrying on of propaganda or otherwise attempting to influence legislation.

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Article IV

GOVERNING BOARD

1. Functions and Definitions. The affairs of the Corporation shall be managed by a governing board, which is herein referred to as the "Board of Directors" or "directors." The word "director" or "directors" likewise herein refers to a member or members of the governing board notwithstanding the designation of a different official title or titles. The use of the phrase "Full Board" herein refers to the total number of directors which the Corporation would have if there were no vacancies.

2. Qualifications and Number. Each director shall be a natural person of full age. A director need not be a citizen of the United States or a resident of the District of Columbia unless a majority of the Full Board shall provide otherwise.

The initial Board of Directors shall consist of three persons, which is the number of initial directors fixed in the Articles of Incorporation, and which shall be the fixed number of directors until changed. The number of directors shall never be fewer than three. The number of directors may be increased or decreased from time to time by amendment of these Bylaws, but no decrease in the number of directors shall have the effect of shortening the term of any incumbent director. The Full Board of Directors shall consist of the number of directors fixed herein.

3. Election and Term. The initial Board of Directors shall consist of the directors named in the Articles of

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Incorporation and shall hold office until their successors have been elected and qualified. Directors shall subsequently be elected to the Board by vote of the directors then holding office. In the election of directors, a plurality of the votes cast at a meeting at which a quorum is present shall elect. Any newly created directorships and any vacancies in the Board of Directors, including any unfilled vacancies resulting from the removal of one or more directors, may be filled by the affirmative vote of a majority of the then remaining directors, although less than a quorum exists.

4. Meetings.

Time. Meetings shall be held at such time as the Board shall fix, except that the first meeting of a newly elected Board shall be held as soon after its election as the directors may conveniently assemble.

Place. Meetings shall be held at such place within or without the District of Columbia as shall be fixed by the Board.

Call. No call shall be required for regular or special meetings for which the time and place have been fixed. Special meetings may be called by the Chairman of the Board, the Vice Chairman of the Board, if any, the President, or a Vice President, if any, or by a majority of the directors.

Notice or Actual or Constructive Waiver of Notice.

No notice shall be required for regular or annual meetings for which the time and place have been fixed. Written, oral, or any other mode of notice of the time and place shall be

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given for special meetings in sufficient time for the convenient assembly of the directors thereat. The notice of any meeting need not specify the business to be transacted or the purpose of the meeting. Notice of any adjournment of a meeting of the Board of Directors to another time or place because a quorum is not present shall be given to the directors who were not present at the time of the adjournment and, unless such time and place are not announced at the meeting, to the other directors. Any requirement of furnishing notice shall be waived by any director who signs a waiver of notice before or after the meeting. A director's attendance at any meeting shall constitute a waiver of notice of such meeting, excepting such attendance at a meeting by such director for the purpose of objection to the transaction of business because the meeting is not lawfully called or convened.

Quorum and Action. Except as may otherwise be provided by the Articles of Incorporation and these Bylaws, a majority of the Full Board shall constitute a quorum. Whenever a vacancy or vacancies in the Board shall prevent a quorum from consisting of a majority of the Full Board as aforesaid, a quorum shall consist of at least one-third of the Full Board. A majority of the directors present, whether or not a quorum is present, may adjourn a meeting to another time and place. Except as otherwise provided by the District of Columbia Nonprofit Corporation Act, the Articles of Incorporation, or these Bylaws, the vote of a majority of the directors present at the time of the vote, if a quorum is present at such time, shall constitute the act of the Board.

Chairman of the Meeting. The Chairman of the Board, if any and if present and acting, shall preside at all meetings. Otherwise, the President, if present and acting, or any other director chosen by the Board, shall preside.

5. Removal of Directors. Any director may be removed, with or without cause, at a meeting expressly called for that purpose, by a vote of at least three-fourths (3/4) of the other directors holding office. At the same meeting, or any adjourned meeting, the vacancy or vacancies resulting from any such removal may, by a plurality of votes cast at any such duly organized meeting, be filled.

6. Committees. The Board of Directors, by resolution adopted by a majority of the Full Board of Directors, may designate from their number two or more directors to constitute an Executive Committee and other committees, each of which, to the extent provided in the resolution designating it, shall have and exercise the authority of the Board of Directors with the exception of any matters which are required by the authorizing resolution to be submitted to the Full Board for their approval.

Other committees not having and exercising the authority of the Board of Directors in the management of the affairs of the corporation as aforesaid may be designated and appointed by a resolution or resolutions adopted by a majority of the directors present at a meeting at which a quorum is present.

7. Written Action. Any action required or permitted to be taken at a meeting of the Board of Directors may be taken

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without a meeting if a consent in writing, setting forth the action to be taken, shall be signed by all of the directors.

8. Action By Telephone or Other Telecommunications Equipment. Members of the Board of Directors or any committee designated thereby may participate in any meeting of such Board or committee by means of conference telephone or similar communications equipment by means of which all persons participating in the meeting can hear each other, and participation in a meeting pursuant to this paragraph shall constitute presence in person at such meetings.

Article V

OFFICERS

The Board of Directors shall elect or appoint a President, a Secretary, and a Treasurer and may elect or appoint a Chairman of the Board, a Vice Chairman of the Board, one or more Vice Presidents and such other executive, managerial, fiscal, and assistant officers as it deems necessary for the Corporation. Assistant officers may be appointed or chosen in such a manner as the Board of Directors shall determine. The officers of the corporation may be designated by such other titles as may be permitted by the provisions of the District of Columbia Nonprofit Corporation Act and as may be determined by the Board of Directors. Officers may be elected for one or more consecutive terms. The term of office of any officer shall not exceed three

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years. Any two or more offices may be held by the same persons, except the offices of President and of Secretary.

Unless otherwise provided in the resolution of election or appointment or other instrument choosing or appointing any officer each officer shall hold office until his successor has been elected, appointed or chosen and qualified.

Officers shall have the powers and duties defined in the resolution or the instrument electing, appointing, or choosing them, as the case may be.

The Board of Directors may remove any officer whenever in its judgment the best interest of the Corporation will be served thereby, except that the removal of the President shall require a vote of at least three-fourths (3/4) of the other directors holding office.

Article VI

BOOKS AND RECORDS

The Corporation shall keep correct and complete books and records of account and shall keep minutes of the proceedings of the members of the Board of Directors and of any committee having the authority of the Board of Directors.

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Article VII

CORPORATE SEAL

The corporate seal shall be in such form as the Board of Directors shall prescribe.

Article VIII

FISCAL YEAR

The fiscal year of the corporation shall be fixed, and shall be subject to change, by the Board of Directors.

Article IX

CONTROL OVER BYLAWS

The initial Bylaws shall be adopted by the directors at their organizational meeting. Thereafter, the power to amend or repeal the Bylaws and to adopt new Bylaws shall be vested in the Board of Directors.

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I HEREBY CERTIFY that the foregoing is a full, true and correct copy of the Bylaws of Arab-American Institute a District of Columbia Nonprofit Corporation as in effect on the date hereof.

WITNESS my hand and seal of the Corporation.

Dated:

Secretary of Arab-American Institute

(SEAL)

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AAI ORGANIZATIONAL CHART

March 1988

James J. Zogby
Exec. Director

Helen H. Samhan
Deputy Director

Susan Ziadeh	Sally Ethelston	Robin Madrid	Janet Ziegler	Ethel Ellis	Lynn Moore
Program Dir.	Pub. Affs. Dir.	Organizing	Production Mgr.	Staff Acct.	Receptionist

Yasmine Bahrani	Jamal Najjab	Mohammed Al-Hatto
Staff Writer	Organ. Asst.	Production Asst.

Charles Zogby	Tony Price
Organ. Asst.	Computer Oper.

TO: EMPLOYEES OF THE ARAB AMERICAN INSTITUTE

RE: HIRING AND OFFICE PROCEDURES

1) Hiring Policy

The Arab American Institute is an equal opportunity employer and does not discriminate on the basis of race, age, gender, religion or handicap.

2) Employee Status

A full time employee is one who is hired to work a full work week. A parttime employee is hired to work up to thirty hours per week. Temporary employees are hired for a specified time limit. Parttime and temporary employees are not eligible for health benefits, pension or paid holidays. Permanent parttime employees are eligible for prorated vacation days.

3) Office Hours

Office hours are 9:30 am to 6:00 pm. Monday through Friday. An employee must obtain prior approval of either the Director or Deputy Director in order to adjust his or her work hours.

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TO: Employees of the Arab American Institute
RE: PROCEDURES FOR PAY AND SALARY REVIEW

1) Paydays

Employees are paid semi-monthly, on the 15th and last business day of the month. Salary advances must be approved by the Deputy Director.

2) Withholding of Taxes

Federal income tax, social security tax (7.51%) and state taxes are withheld from each paycheck for all employees. A W-2 form is filed each January and records all taxes withheld the previous year.

3) Salary Review

Annual reviews of job performance, responsibilities and salary will take place in December, unless otherwise requested by an employee's supervisor. Raises or other salary adjustments are considered by the board of directors based upon performance, change in the cost of living index and the budgetary status of the Institute.

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TO: EMPLOYEES OF THE ARAB AMERICAN INSTITUTE

RE: EMPLOYEE BENEFITS

1) Health Benefits

All full time employees are eligible for fully paid health insurance with Blue Cross Blue Shield of the National Capital Area.

2) Pension Plan

Employees are eligible after one year of full time service to participate in the Institute pension plan. A summary of the plan (Arab American Institute Money Purchase Pension Plan and Trust) will be given to employees upon eligibility. Once an employee becomes eligible, 3% of his/her salary is contributed by the employer annually: 25% is used to purchase a life insurance policy; 75% is invested in a guaranteed pension fund.

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TO: Employees of the Arab American Institute

RE: LEAVE

1) Annual Leave

Employees are eligible for two (2) weeks of vacation for every 12 months of full time work as an employee. All vacations must be approved in advance by either the Director or Deputy Director.

A maximum of one (1) week of annual leave may be carried over into the next calendar year.

2) Sick Leave

An employee is eligible for up to ten (10) days of leave per calendar year for medical reasons. This includes doctors visits and family emergencies. Leave forms are required for advance medical appointments.

3) Paid Holidays

An employee is eligible for ten (10) Federal holidays and four (4) bonus holidays (indicated in bold). In most cases, when a legal holiday falls on a weekend, the office will close either Friday or Monday.

New Year's Day (January 1)

Martin Luther King's Birthday (3rd Monday in January)

Washington's Birthday (3rd Monday in February)

Good Friday

Memorial Day (last Monday in May)

Independence Day (July 4)

Labor Day (1st Monday in September)

Columbus Day (2nd Monday in October)

Veterans Day (November 11)

Thanksgiving Day (4th Thursday in November)

Thanksgiving Friday

Christmas Eve

Christmas Day

New Year's Eve

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(B)

INVOICE

February 14, 1989

TO: Arab American Republican Federation
FROM: Arab American Institute (AAI)
RE: Annual Billing for Expenses and Services Rendered

The following is a breakdown of expenses incurred by the Arab American Institute (AAI) on behalf of the Arab American Republican Federation (ARF) for the calendar year ending December 31, 1988.

<u>CATEGORY</u>	<u>AMOUNT</u>
I. Travel Expenses	\$ 85.68
II. Postage from AAI daily log (Jan-Dec 1987)	784.87
III. Telephone	93.93
IV. Typesetting/Design	401.41
V. Stationary/Letterhead	205.00
VI. Printing/Copying	676.95
VII. AAI Staff Services for ARF activities based on 5% of program assistant time and 2% of staff secretary	1,320.00
VIII. Share of Overhead at 918-16th Street, Suite 501 (rent/machine usage)	<u>1,000.00</u>
TOTAL	<u>\$4,567.84</u>

ARAB AMERICAN INSTITUTE 1987
INCOME STATEMENT
DEPARTMENT 4
PERIOD ENDING: DECEMBER 31, 1988

ARF

	CURRENT	%	YEAR-TO-DATE	%
EXPENSES				
TEL & TEL	.00	***	93.93	***
P & D	38.20	***	784.87	***
TRAVL-GROUND TRANSPORTA	.00	***	85.68	***
STATIONARY & LETTERHEAD	125.00	***	205.00	***
PRINTING & COPYING	.00	***	676.95	***
TYPESETTING & DESIGN	.00	***	401.41	***
 TOTAL EXPENSES	 163.20	 ***	 2,247.84	 ***
 OPERATING INCOME (LOSS)	 (163.20)	 ***	 (2,247.84)	 ***
 NET INCOME (LOSS)	 (163.20)	 ***	 (2,247.84)	 ***

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INVOICE

TO: ARAB AMERICAN REPUBLICAN FEDERATION
 FROM: ARAB AMERICAN INSTITUTE
 RE: Annual Billing for Expenses and Services Rendered
 DATE: April 26, 1988

The following is a breakdown of expenses incurred by the AAI on behalf of the ARF in calendar year ending December 31, 1987.

<u>CATEGORY</u>	<u>AMOUNT</u>
I. Postage from AAI daily log (Jan-Dec 1987)	\$ 478.14
II. Telephone	47.37
III. Travel Expenses	68.14
IV. Event Expenses	734.80
V. Consultant Services	200.00
VI. Share of Overhead at 918-16th Street, Suite 501 (rent/machine usage)	1,000.00
VII. AAI Staff Services for ARF activities based on 5% of program assistant time and 2% of staff secretary	<u>1,320.00</u>
TOTAL	\$3,848.45

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Rep Fed

INCOME STATEMENT
DEPARTMENT 4
PERIOD ENDING: DECEMBER 31, 87

	CURRENT	%	YEAR-TO-DATE	%
EXPENSES				
TEL & TEL	(47.37)	***	.00	***
P & D	(478.14)	***	.00	***
TRAVEL-LODGING	(68.14)	***	.00	***
PROMOTION & ENTER. <i>-event expenses</i>	(734.80)	***	.00	***
CONS. - J. ZOGBY ASSOC	(200.00)	***	.00	***
TOTAL EXPENSES	(1,528.45)	***	.00	***
OPERATING INCOME	1,528.45	***	.00	***
NET INCOME	1,528.45	***	.00	***

93043501488



Arab American Democratic Federation

©

EXECUTIVE BOARD

Buffalo:

Yasmin Hasan
82 Redwood Terrace
Williamsville, NY 14221
(O) 716/688-1347

Ali Rizek
94 Telfain Drive
Williamsville, NY 14221

Brooklyn:

Neal Sadd
341 Sacket Street
Brooklyn, NY 11231
(O) 718/625-4259

Michael Masoud
305 Atlantic Avenue
Brooklyn, NY 11201
(O) 718/522-4010
(H) 718/627-0164

Chicago:

Mansour Mansour, Secretary
2800 Buckingham
Westchester, IL 60153
(O) 312/562-5863

Khalil Shalabi
2907 West 79th Street
Chicago, IL 60652
(O) 312/924-4470

Detroit:

Jumana Judeh, Vice-Chair
14511 Tireman, #5
Dearborn, MI 48126
(O) 313/223-5205

Rhode Island:

Bob Laffey
34 McAloon Street
Pawtucket, RI 02861
(H) 401/725-7317

Joe Rehab
23 Walker Road
Lincoln, RI 02865
(O) 401/725-6630
(H) 401/726-8686

Washington, DC:

Jawad George, Parliamentarian
5250 Valley Forge Dr, #807
Alexandria, VA 22304
(O) 202/543-7990

James Zogby
918 16th Street, NW, #501
Washington, DC 20006
(O) 202/429-9210

Youngstown:

Ghaleb Rizkalleh
2888 Red Fox Run
Warren, OH 44485
(O) 216/399-5872
(H) 216/898-4402

Sam Bahour, Rec. Secretary
2909 Biscayne Avenue
Youngstown, OH 44505
(O) 216/744-4793
(H) 216/759-2738

-2-

At-Large:

John Zogby, Chairman
419 Mandeville St., #201A
Utica, NY 13502
(O) 315/738-0167
(H) 315/733-6362

Yehia Shousher
451 South Fargo
Oregon, OH 43616
(O) 419/698-1170
(H) 419/693-8369

Ali Hossaini, Rainbow Liaison
10211 Apache Road
Richmond, VA 23235
(O) 804/786-0655

Anis Barghouti, Treasurer
84-15 Smedley Street
Jamaica, NY 11435
(O) 212/432-0655

93043501490

March 14, 1987

INTERNATIONAL GRAPHICS

INVOICE

PRINTING SERVICE

NO. 10316

DATE 1/7/88

4411 FORTY-FIRST STREET
BENTWOOD, MD. 20722
PHONE: (301) 779-7774

"Arab-Americans for George Bush" % ARAB
Arab-American Institute
918 Sixteenth St. NW, Suite 501
Washington, DC 20006

SOLD TO

OUR ORDER NO.	YOUR ORDER NO.	DATE	TERMS	SHIPPED VIA	Ppd. or Coll.
11334	C. Zogby	12/20/87	net 20 days	P.O. / our truck	
QUANTITY	DESCRIPTION			PRICE	AMOUNT
5000	Letterheads - Arab-Americans for G. Bush Letter printed on letterhead				175.00
5000	#9 Envelopes				125.00
5000	#10 Envelopes				125.00
5000	Second page letter				125.00
	Insert three items, affix labels, stamp and mail				200.00
Pd 1.25.88					
#1013					
702.26					
				<input type="checkbox"/> SALES TAX	

PLEASE RETURN THE YELLOW COPY
WITH YOUR PAYMENT.

TOTAL \$750.00
(R) (47.74) - credit for postage
// 702.26

9 3 0 4 3 5 0 1 4 9 2
INTERNATIONAL GRAPHICS

INVOICE



NO. 10362

DATE 1/15/88

4411 FORTY-FIRST STREET
BENTWOOD, MD. 20722
PHONE: (301) 779-7774

☒ Arab Americans for George Bush % AARF
~~Arab American Institute~~
918 16th St. NW, Suite 501
Washington, DC 20006

SOLD
TO

OUR ORDER NO.	YOUR ORDER NO.	DATE	TERMS	SHIPPED VIA	Ppd. or Coll.
11440	C. Zogby	1/12/88	net 20 days	our truck	
QUANTITY	DESCRIPTION			PRICE	AMOUNT
500	Letterheads - Arab Americans for Bush				60.00
500	#10 Envelopes				
				<input type="checkbox"/> SALES TAX	

PLEASE RETURN THE YELLOW COPY
WITH YOUR PAYMENT.

TOTAL \$60.00

MAC SYSTEMS
P.O. Box 957
BELTSVILLE, MD 20

INVOICE

(301) 937-0090

Arab-American Institute
Attn: Accounts Payable
918 16th Street NW
Suite 501
Washington DC 20006

SALESPERSON Invoice #41261 DATE OF INVOICE October 28, 198

SHIP TO

* 2% 10 days-Net 30 days

ACCOUNT NO.	DATE SHIPPED	SHIPPED VIA	COL P.P.	F.O.B. POINT	TERMS	YOUR ORDER NUMBER
LEB					*	T. Price
QUANTITY	DESCRIPTION				UNIT PRICE	AMOUNT
	Select and print cheshire labels (LSL - 1,639; LRU, LRR, LRD - 3,336) and deliver.					172
					Scanned from 5-7-50	
					AA's for Bush % AARF	\$115.00
					TOTAL	172

ORIGINAL

Washington Square Station

153

Always show your P.O. Box No. and ZIP Code in your return address

20035

Received Post Office Box/Caller Service Fees
From: (Name of Customer) Charles Zagly
Draft Americans for George Bush

Amount

\$11.00

See Rules for use of Post Office Box and Caller Service on Form 1093, Application for Post Office Box or Caller Service (May 1976 or later editions)

(Dating Stamp)

Box Number

65153

☒ For one semiannual payment period

☐ For Annual payment period

☐ Reserved Number Fee

Ending (Date)

6/30/88

Postmaster By

W. K. White



Original

PS Form 1538
Feb. 1984

RECEIPT FOR POST OFFICE BOX/CALLER SERVICE FEES

U.S. Government Printing Office: 1984-755-427

93043501494

ARAB AMERICAN REPUBLICAN FEDERATION

918 - 16TH ST., N.W., SUITE 501
WASHINGTON, D.C. 20006

1013

15-55/540

PAY
TO THE
ORDER OF

International Graphics

January 25 1988

\$ 702.26

Seven hundred and two doll

26 / 100 DOLLARS

AMERICAN SECURITY BANK, N.A.

City Office
1912 K Street, N.W.
Washington, D.C. 20006

FOR

⑈001013⑈ ⑆05400055⑆ ⑆13⑈865 61 313⑈ ⑆0000070226⑈

ARAB AMERICAN REPUBLICAN FEDERATION

918 - 16TH ST., N.W., SUITE 501
WASHINGTON, D.C. 20006

1020

15-55/540

PAY
TO THE
ORDER OF

International Graphics

June 3 1988

\$ 60.00

Sixty dollars

/ 100 DOLLARS

AMERICAN SECURITY BANK, N.A.

City Office
1912 K Street, N.W.
Washington, D.C. 20006

FOR

⑈001020⑈ ⑆05400055⑆ ⑆13⑈865 61 313⑈ ⑆0000006000⑈

ARAB AMERICAN REPUBLICAN FEDERATION

918 - 16TH ST., N.W., SUITE 501
WASHINGTON, D.C. 20006

1012

15-55/540

PAY
TO THE
ORDER OF

International Graphics

January 4 1988

\$ 1100.00

One thousand-one hundred doll

/ 100 DOLLARS

AMERICAN SECURITY BANK, N.A.

City Office
1912 K Street, N.W.
Washington, D.C. 20006

FOR

postage ck 7190 (882)

⑈001012⑈ ⑆05400055⑆ ⑆13⑈865 61 313⑈ ⑆0000110000⑈

ARAB AMERICAN REPUBLICAN FEDERATION
918 - 16TH ST., N.W., SUITE 501
WASHINGTON, D.C. 20006

1009

November 24 1987

15-55/540

PAY
TO THE
ORDER OF

MAC Systems

\$ 115.00

One hundred fifteen dollars

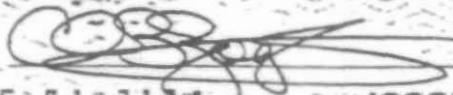
115/100 DOLLARS

AMERICAN SECURITY BANK, N.A.

City Office
1912 K Street, N.W.
Washington, D.C. 20006

FOR

Inv. # 41261



⑈001009⑈ - ⑈05400055⑈ ⑈13⑈865 6⑈313⑈ ⑈0000011500⑈

ARAB AMERICAN REPUBLICAN FEDERATION
918 - 16TH ST., N.W., SUITE 501
WASHINGTON, D.C. 20006

429-9210(0)

1010

December 7 1987

15-55/540

PAY
TO THE
ORDER OF

U.S. Postmaster

\$ 11.00

Eleven dollars

11/100 DOLLARS

AMERICAN SECURITY BANK, N.A.

City Office
1912 K Street, N.W.
Washington, D.C. 20006

FOR



⑈001010⑈ - ⑈05400055⑈ ⑈13⑈865 6⑈313⑈ ⑈0000001100⑈

OGC 9860

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

January 17, 1991

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attn: Jim Brown

Re: MUR 2767

Dear Mr. Noble:

This Response is submitted on behalf of Bush-Quayle 88, Inc., and J. Stanley Huckaby, as treasurer, in reply to the Interrogatories and Request for Documents propounded by the Federal Election Commission on November 27, 1990 in Matter Under Review 2767.

Enclosed please find a copy of the interrogatory responses which have been signed by Mr. Huckaby. We will submit a notarized copy of these interrogatories when Mr. Huckaby returns to Washington next week. The affidavits attached to these interrogatory responses are the original signed and sworn documents.

Sincerely,

Jan Baran / CAC
Jan Witold Baran

Enclosures
cc: J. Stanley Huckaby

JWB:co

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF LEGAL COUNSEL
91 JAN 17 PM 4:14

93043501497

RESPONSE OF BUSH-QUAYLE 88 TO THE
INTERROGATORIES OF THE FEDERAL ELECTION COMMISSION
IN MUR 2767

QUESTION 1

Identify all ethnic newspapers referenced in your July 24, 1989 response to Interrogatory No. 3 in which the National Voter Coalitions ("NVC") paid for the placement of advertisements urging readers to vote for George Bush.

- (a) Provide the dates each advertisement was placed and the costs incurred per advertisement.
- (b) Produce copies of all such advertisements and invoices related thereto.

RESPONSE

As stated by Mark Holman in his Affidavit Before The Federal Election Commission, dated January 11, 1991 (hereinafter "Holman Aff.").

The National Voter Coalitions placed advertisements in each of twenty-five different ethnic newspapers. The list of these newspapers is as follows:

Dziennik Zwiazkowy (Polish)
Fra Noi (Italian)
Italian Tribune News (Italian)
Post Eagle (Polish)
Szabadsaq/Nepszava (Hungarian)
American Home (Slovenian)
Il Progresso (Italian)
Nowy Dziennik (Polish)
Svoboda (Ukrainian)
Armenian Reporter (Armenian)
Armenian Life Weekly (Armenian)
Armenian Observer (Armenian)
Nor Gyank (Armenian)
Armenian Mirror-Spectator (Armenian)
Asbarez (Armenian)
Italian Times (Italian)
South Philadelphia American (Italian)
Sons of Italy Times (Italian)
Relax (Polish)

93043501498

Gwiazda Ploarna (Polish)
Panorama (Polish)
Polish American World (Polish)
Polish American Journal (Polish)
Straz (Polish)
Polish Daily News (Polish)

These advertisements were all to run toward the end of October or the beginning of November, depending upon the newspaper's publication schedule. One captioned "George Bush Shares The Values Of Ethnic Americans;" one captioned "George Bush Shares The Values Of Polish Americans;" and one captioned "George Bush Shares The Values Of Italian Americans." . . . attached at Exhibit 1 are copies of each advertisement sent to the National Voter Coalitions Office by George Bush's supporters. These include a copy of each of the three versions of the advertisement.

The dates the advertisements were placed or appeared and their costs are as indicated on the attached invoices at Exhibit 1. Bush-Quayle 88 has been unable to locate invoices for the following newspapers identified above: Post Eagle; Italian Times; and Gwiazda Ploarna.

QUESTION 2

Identify all "editorials" referenced in our July 24, 1989 discovery response to Interrogatory No. 3 which the NVC sent to ethnic newspapers for voluntary publication.

- (a) Provide the dates each editorial was sent and the costs incurred.
- (b) Produce copies of all such editorials and invoices related thereto.

RESPONSE

The National Voter Coalitions Office intended to distribute between three and five editorials for voluntary publication by the ethnic newspapers receiving copies of the editorials. Two such

93043501499

editorials entitled "Anniversary of Evil -- Reminder of Freedom's Price," and "Our Values Make America Great" were distributed on October 10, 1988. Three other editorials were distributed on October 25, 1988. These were entitled "The Unraveling of America"; "Massachusetts Miracle . . . Or Mirage"; and "The Reagan-Bush Record: Peace, Pride And Prosperity." There were no identifiable costs associated with any of these editorials other than the cost of postage which would have been de minimus, and not separately recorded. Copies of these editorials are attached at Exhibit 2.

Holman Aff. at ¶3.

QUESTION 3

Produce copies of all "weekly mailings" issued to national coalition leaders and referenced in your July 24, 1989 response to Interrogatory No. 3.

RESPONSE

These are attached as Exhibit 3 to the Holman Affidavit.

QUESTION 4

Your July 24th response and the Mark Holman affidavit indicate that Charles Zogby was responsible primarily for drafting of all the NVC's weekly informational mailings. Identify all other individuals involved in drafting or revising of such weekly mailings prior to their distribution. Provide copies of all such weekly informational mailings.

RESPONSE

As stated by Mark Holman. "I reviewed and revised all such mailings and was the only other individual in the National Voter Coalitions office to do so." Holman Aff. at ¶ 3.

QUESTION 5

Provide a copy of the "Coalition Handbook" referenced in your July 24, 1989 Response at page 5.

- a. Identify all persons who received the Coalition Handbook and provide the dates and Handbook was distributed.
- b. Describe the method(s) the NVC used to ensure that volunteers got a copy of the handbook.

RESPONSE

As stated by Ceci Cole McInturff in her Affidavit Before the Federal Election Commission, dated January 16, 1991, at ¶ 2:

The actual list of persons who received the Coalition Handbook included, but was not limited to, the attached National Leadership List. Exhibit 1. In addition, individuals identified to the National Voter Coalitions Office specifically by the state Bush-Quayle 88 headquarters received copies of the Coalition Handbook. The Coalition Handbooks were mailed in September and continued October, 1988. The Handbooks were printed in Illinois and shipped directly to the individuals on the attached list, among others, as specified above.

Finally, during the printing and mailing process, an additional separate legal guidance section was prepared and inserted into the Coalition Handbooks.

We have searched our files and come across a legal memorandum which we believe was inserted in the Handbooks. A copy is attached at Exhibit 2. However, we have not been able to locate any final version of the Handbook itself.

93043501501

- 5 -

The above information is true and correct to the best of
my information and belief.


Star Huckaby

Signed and sworn to before me
this _____ day of January, 1991

Notary Public
My Commission Expires:

93043501502

93043501503

INVOICE

EPV
Promo 10K comm. rate

INVOICE NO. 69509

CUSTOMER NO. 1-DISPLY

ESTABLISHED 1881

Polish Daily Zgoda

DZIENNIK ZWIAZKOWY
OF THE

ALLIANCE PRINTERS & PUBLISHERS, INC.
6100 N. CICERO AVENUE CHICAGO, IL 60646

PHONE (312) 286-014
ANTHONY J. SZPIL
General Manager

ORDER
IDENT.

BILL TO: BUSH QUAYLE "88"
733 15TH STREET NW
SUITE 600 - ATTN: EVE NETEROWICZ
WASHINGTON DC. 20005

INVOICE DATE		(202)-624-8601 Ext. 5045-6				Terms: Net 30 Days	
10-14-88							
PURCHASE ORDER NO.		DATE FIRST APPEARED		SALES PERSON		OUR ORDER NUMBER	
		OCTOBER 28					
QUANTITY		DESCRIPTION				UNIT PRICE	EXTENDED PRICE
Lines	Lines						
		1/2 PAGE ADV. OCTOBER 28				661.50	661.50
		INVOICE TOTAL				661.50	661.50
		<div>PAID Jm 10/19/88 ck# 102783</div>					

PAID
Jm 10/19/88
ck # 102783

9304350150

STATEMENT OF ACCOUNT

OK EKI

FRA NOI
480 N. Wolf Rd.
Northlake, IL 60164

Telephone (312) 562-2575

Promotions

2016 comm.

FOR THE ACCOUNT OF

Bush/Quayle '88
733 15th St. N.W.
Suite 600
Washington, D. C. 20005

ACCOUNT NO.

STATEMENT DATE

Attention: Eva Neterowicz

10/12/88

COOKS I=INVOICE DR=DEBIT MEMO CR=CREDIT MEMO BF=BALANCE FORWARD P=PAYMENT DA=DISCOUNT ALLOWED FC=FINANCE CHARGE

DATE	CODE	REF. NO.	P.O. NO.	DESCRIPTIONS	CHARGES	CREDITS
10/12/88				1/2 page November 1988	\$215.00	

PAID

PLEASE PAY ➡

\$215.00

PAID

Received
ad

93043501505

ITALIAN TRIBUNE NEWS
417 Bloomfield Avenue
Newark, N.J. 07107
(201) 485-6000

10-31-88

194

BUSH-QUALE '88
733 15TH STREET N W SUITE 600
WASHINGTON DC 20005
ATTN: EVA NETEROWICZ

NAME OF ACCOUNT
BUSH-QUALE '88

APPROVED BY

ACCOUNT NO
194

INSERTION DATES

LINE

INCHES

COST

AMOUNT

TOTAL:

\$ 141.25

LATE CHARGE:

0.00

LAST PAYMENT RECEIVED WAS: 10-25-88

FOR--->

141.25

DUE:

\$ 0.00

THANK YOU

THIS AMOUNT: (MAKE CHECK PAYABLE TO: ITALIAN TRIBUNE)

\$ 0.00

93043501506

LIBERTY MEDIA, INC.
SZABADSAG-NEPSZAVA
5842 MAYFIELD ROAD
CLEVELAND, OHIO 44124

MS. EVA NETEROVICZ
BUSH-QUAYLE '88
733 FIFTEENTH STREET N.W. STE. 600
WASHINGTON, D.C. 20005

INVOICE

DATE
10-11-88

NUMBER
4014

SK EPV
Promo
201K comm

DISPLAY AD FOR OCT. 28, 1988

\$218.75

PAID
Jan 10/19/89
Ch# 102755

\$218.75

12 page- 10 1/2 dp x 6 wd.

PAID
Jan 10/19/89
Ch# 102755

send check w/ this ad.

Received
ad

OK SM PROMO 20K commitment
American Home Publishing Co., Inc.

6117 St. Clair Avenue
Cleveland, Ohio 44103
431-0628

Tabloid Newspapers Our Specialty
General, Commercial Printing
PUBLISHERS OF
Ameriška Domovina
Slovenian/English Newspaper

Oct. 18, 19 88

- Eva Neterowicz
BUSHQUAYTE 88
- 737 15 St. N.W.
Suite 600
Washington, D.C.

20005

Advertising-Printing	Subscription	Amount
Oct. 28, 1988	one half page ad 40 inches -----	\$ 240.00

PAID

Jan 10/26/88

CL# 103299

Bills payable within 30 days. Thereafter 1½% interest charge a month.

PAID

Jan 10/26/88

CL# 103299

93043501508
~~CHECK~~
~~W/TERMINAL~~
CHECK
TODAY
AFTER 4pm
Cable
Faxes

Received
AD

1/2 page = 8" deep x 10" wide

10/15
FedX

4L PROGRESSO
Advertising Venture Int'l
2 East 37th St
New York, NY 10016

OLIVER
(20K comm)
Demo

Ms. Eva Neterowicz
Bush - Quayle 88
733 15th Street N.W. Suite 600
Washington, D.C. 20005

DATE	INVOICE NO.
10 /30/88	00001

REFER. #	DATE	ADVERTISER	LINES	RATE	AMOUNT
10/30/88		Bush- Quayle 88	35 Col. In.		1,382.50
			Total		\$ 1,382.50
<u>PAID</u>					

93043501509

PAID

10/15 Fed x

DZIENNIK POLISH DAILY NEWS
WIEGLAD POLSKI POLISH REVIEW
NEW HORIZON POLISH-AMERICAN REVIEW

BICENTENNIAL PUBLISHING CORP.
 21 WEST 38th STREET
 NEW YORK, N. Y. 10018-3599
 Tel. (212) 354-0490-91-92

INVOICE

10/18/88

Date _____

To

MS. EVA NETEROWICZ
 Bush /Quayle
 733 -15 Street North West #600
 Washington, DC. 20005

☐ Display Invoice No. D. 2004/88
☐ Classified Invoice No. _____
☐ Subscription: _____
 Direct

Please make checks payable to BICENTENNIAL PUBL. CORP.
 PAYMENT IS DUE ON PRESENTATION OF BILL.

ADVERTISING DATES OF INSERTION	CLASSIFICATION	INCHES OR LINES	TIMES	RATE	GROSS	15%	NET
SUBSCRIPTION PRENUMERATA	FROM: TO:	PERIOD	DAILY	WKLY			
10/27/88	Display	1/2 page	1	320.00			\$320.00
	Payable on the 10th day from invoice Date						
						AMOUNT DUE	\$320.00

AGENT:

PAID

Jan 10/21/88
CL # 102976

FOR ADVERTISING— Write the above Invoice Number on Your Check to Identify Payment.
 Your Check is your receipt — receipted bill returned upon request.

1/2 page - 6 1/2 dp x 9 3/4 wide

RECEIVED
 AD

PAID

Jan 10/21/88
 102976

10/15 Ford x

BUDA

THE UKRAINIAN WEEKLY

- Oldest and foremost Ukrainian language daily in the United States.
- Published daily, except Sundays, Mondays and holidays.

- English language weekly newspaper offering a Ukrainian perspective on the news.
- Published Sundays.

PUBLISHED BY THE UKRAINIAN NATIONAL ASSOCIATION, INC.

30 Montgomery Street, Jersey City, N.J. 07302 ■ (201) 434-0237 ■ (212) 227-4125

13766

To Bush Quayle 88

LC Ad 8071

733 15th St. N.W. Suite 600

Washington, D.C. 20005

October 12, 1988

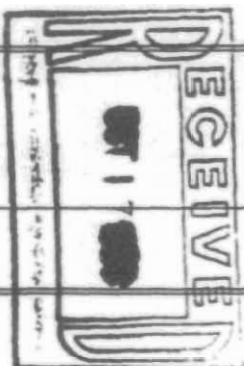
1

Insertion of Advertisement 1/2 Pg.
Issue # 206
/ Campaign/

Total 1/2Pg

PAID

750 00



Bills are payable within 15 days — in U.S. currency only.
Please return bill with payment or indicate bill number.

11510524036

THE ARMENIAN THE ARMENIAN THE ARMENIAN THE ARMENIAN
REPORTERREPORTERREPORTERREPORTER

Telephone (718) 380-3636

Published by A.R. Publishing Co., Inc.

Mailing Address:
 P.O. Box 600
 Fresh Meadows, N.Y. 11365

EPV -
 Promo

Eva Neterowicz
 Bush-Quayle 88
 733 15 St. N.W.
 Suite 600
 Washington, D.C. 20005

Invoice #1009

Date: Oct. 11, 1988

Number of Insertions	Number of Lines or Inches	Description	Cost Per Insertion	Amount
1		1/2 Page Ad - Issue #2, Oct. 20, 1988 "BUSH-QUAYLE 88"	250.00	250.00

PAID
 Jm 10/17/88
 Ch # 102712

Total..... \$250.00

Please make check payable to A.R. Publishing Co., Inc. and either return this invoice
 or mark invoice number on check.

PAID
 Jm 10/19/88
 Ch # 102712

Received
 AD

93043501512

HAI LIFE PUBLISHING & MAILING

P.O. Box 70255
PASADENA, CALIFORNIA 91107

1-800-424-5433

OK EPV
1369 Promo

TO
Eva Neterowicz
BUSH - QUAYLE '88 Campaign
733 15th St N.W., Suite 600
Washington, D.C. 20005

DATE	10-10-88
CUSTOMER ORDER NO	
contact:	Apo Jabarian
VIA	

TERMS 202-624-8601 X5045/6

QUANTITY	DESCRIPTION	PRICE	AMOUNT
1	Display adv in ARMENIAN LIFE Weekly		
	Size: 1/2 page to be Published as per issue # 2	\$ 325.00	\$ 325.00
	Amount Due.....		\$ 325.00

PAID
Sm 10/19/88
Ch# 102741

ORIGINAL

Thank You!

PAID
Sm 10/19/88
Ch# 102741

Received
AD

93043501513

ARMENIAN OBSERVER

6646 Hollywood Boulevard, Suite 210
Hollywood, California 90028

(213) 467 - 6767

Ms Eva Neterowicz
Bush-Quayle 88
733 15th St. NW Suite 600
Washington DC 20005

OK
EPV
Promo
10K
commit

deadline for

STATEMENT Oct. 20, 1988

SUBSCRIPTION: -

PHOTO: -

BOOK: -

ADVERTISING: -

Social Calendar:

Display:

"George Bush Shares The Values of Ethnic
Americans"

Insertion: October 19, 1988 issue

Size: Half page

\$175.00

in 10/10
th edition
7th)

we page.

PAID
11/10/88
Cl# 104610

TOTAL

\$175.00

11/14/88
Cl# 104610

You may keep this statement for your records.

Received
Ad

A
6
S
H
2

C
E
D

C

93043501514

NOR GYANK

NOR GYANK—NEW LIFE
ARMENIAN / ENGLISH / FRENCH WEEKLY

P.O. box 1694, Glendale, Ca 91209
825 E. Colorado St., Glendale, Ca 91205
(818)240-9996/7

Memo 20K **INVOICE**

DATE	10-13-88
NUMBER	Nº 126649

Bush-Quayle 88
Att/ Eza Neterowicy
733 15th St. N.W. # 600
Wasch. D.C. 20005

adline for

TERMS: (202) 624-8601 # 5045-6

\$ 350.00

PLEASE DETACH AND RETURN WITH YOUR REMITTANCE

DATE	CHARGES AND CREDITS	BALANCE
	BALANCE FORWARD	
	Display Ads (Bush For President) Size: 1/2th page Will be published in # 44, Oct. 20 or # 45, Oct. 27	
	Special Price.....	\$ 350.00
	Amount due upon receipt.....	\$ 350.00
	<u>PALD</u> <i>Sm 10/21/88</i> <i>Ch # 102923</i>	

ner

NOR GYANK

Thank You

PAY LAST AMOUNT
IN THIS COLUMN

PALD

Sm 10/21/88

Ch # 102923

Received
AD

93043501515

THE ARMENIAN MIRROR-SPECTATOR

468 Mt. Auburn Street
P.O. Box 302
WATERTOWN, MASSACHUSETTS 02172

No 1772

TO

Ms. Eva Neterwicz
BUSH-QUAYLE 88
733 15th St., N.W., Suite 600

Washington, D.C. 20005

DATE	ORDER NO.
10/22/88	
SHIP TO	

SALESPERSON	DATE SHIPPED	SHIPPED VIA	F.O.B. POINT	TERMS
QUANTITY	DESCRIPTION			NET 15
	"GEORGE BUSH FOR PRESIDENT" Display Ad;			UNIT PRICE
	October 22nd issue;			TOTAL
	Half page			\$ 140.00

PALD

10/20/88

CL# 102837

Thank You

ORIGINAL

PALD

10/20/88

CL# 102837

Received
Ad

93043501516

INVOICE

Ms. Eva Neterowicz
Bush-Quayle 88
733 15th St. N.W. Ste.600
Washington DC 20005

INVOICE NO: 03080

INVOICE DATE: 10-21-88
CUSTOMER ID: 198011
ORDER DATE: 10-14-88
SALES AGENT: O - C
BUS. PHONE: (202) 624-8601

Ad No. 030801 Type: Display Size:10.00x 7.75 inches 0.5000page
Description: George Bush Shares the Values of Ethnic Americans
Unit List Price: \$ 85 Discount: 25% Number of Units: 2 TIMES
Unit Sale Price: \$ 64 Charge: 127.50 Dates Published:
10-21-88

PAID
Sm 10/28/88
Ch# 103630

TOTAL CHARGE \$ 127.50
TOTAL PAID \$
CREDIT/ADJUSTMENT \$
BALANCE DUE \$ 127.50

* MINIMUM PAYMENT: \$ 127.50 *
* DUE DATE: 10-28-88 *

If there is any error please notify Asbarez immediately.

93043501517

OUR 35TH YEAR

Make all checks payable to the "SOUTH PHILADELPHIA AMERICAN"

Promo
Howard 5-7273
ESTABLISHED 1937

South Philadelphia American

Downtown's Oldest Independent Community Weekly

~~2431 S. 13th St.~~

Philadelphia, Pa. 19148

2414 S. 21st St. Phila. Pa. 19145

Date 10-10-88

Eva Neterowicz
Bush Quale '88
733 15th St. N.W.
Washington, D.C. 20005

DATE	SPACE	RATE	COST
10-28-88	1/2 page Ad		\$150.00
8			
1			
5			
1			
5			
0			
1			
5			
0			
3			
5			
0			
4			
3			
0			
4			
3			
0			
9			

PAID
Jm 10/19/88
CL# 102803

PAID
Jm 10/19/88
CL# 102803

10/15 Fed Ex

RECEIVED
AD.

93043501519



SONS OF ITALY

TIMES

PRINTED BI-WEEKLY

— with —

Circulated Among 50,000 Members of the Order Sons of Italy
in Pennsylvania and Nearby States.

414 Walnut Street • Philadelphia, PA 19106

October 13, 1988

• BILL •

Bush-Quayle 88
733 15th Street, N.W., Suite 600
Washington, D.C. 20005

ATTN: Eva Neterowicz

Re: Advertising

Issue of October 31, 1988

Half page

210 00

PAID

10/20/88

Ch # 102910

CHEMIGRAPH

COMPANY 5242-44 WEST DIVERSEY AVENUE, CHICAGO, ILLINOIS 60639 (312) 283-1898

GRAPHIC ARTSDESIGN
ARTWORK
TYPESETTING
in English & Polish
FULL COLOR SEPARATION

DATE OCT. 11 1988

INVOICE NO 11284

PRINTING SERVICECOMMERCIAL
ADVERTISING
CATALOGUES
BOOKS
LABELS
Etc.To: ☐

BUSH QUALE 1988

93043501520

QUANTITY	DESCRIPTION	UNIT PRICE	EXTENSION	REMARKS
ONE WEEK	ADVERTISING IN POLISH WEEKLY MAGAZINE "RELAX"	1/2 PAGE	27.00 200.00	
PAID <i>In 10/28/88</i> <i>CL# 103647</i>		INVOICE TOTAL	200.00	
		DOWN PAYMENT		
		PAY THIS AMOUNT	200.00	

**Payment Due
Within 15 Days**

ANORAMA

3104 N. CICERO. CHICAGO IL 60641 TEL. 312-685-0406

ILLUSTRATED
POLISH
WEEKLY
MAGAZINE

DATE 11/02 1988

INVOICE

TO: ☐

Buch 80 Quayle

Eva Yeteravicz

National Voter Coalitions.

733 15th St., N.W. Washington, D.C. 20005

QUANTITY		UNIT PRICE	EXTENSION	REMARKS
1	Rate for advertisement (Panorama # 45)	\$ 90.00	\$ 90.00	
PAYMENT DUE WITHIN 15 DAYS		INVOICE TOTAL	\$ 90.00	
		DOWN PAYMENT		
		PAY THIS AMOUNT <input type="checkbox"/>	\$ 90.00	

PAID

On 11/10/88

Ch# 104660

Handwritten signatures and notes:
~~Handwritten signature~~
~~Handwritten signature~~
~~Handwritten signature~~
~~Handwritten signature~~

1/2 page size

**RECEIVED
AD**

~~Handwritten signature~~
 $8\frac{1}{2} \times 5\frac{1}{2}$

10/15 Fee

The Polish American World

AN ENGLISH LANGUAGE NEWSPAPER SERVING THE METROPOLITAN AREA SINCE 1959

3100 GRAND BOULEVARD
BALDWIN, N.Y. 11510
(516) BA 3-6514

Pol
31
Ba
51

Ci
Fr
Di

Eva Neterowicz
Bush Quale 88
733 15th Street NW 6th Floor
Suite 600
Washington, DC 20005

10/88

Des

Col
Bac

occ
pla
Pol
Pol
Yo:

One time ad insertion 10/28/88

\$170.00

line

"George Bush Shares the Values of
Polish Americans"

n.
n.

PAID

SM 10/21/88
Ch# 102977

ties
tes,
; of
; in
New

Mail all bills, payments, etc. to Baldwin Office.

2/12

- ad will appear in Oct 28th ed.
- will send me an invoice
- will send me a copy of ad in paper

PAID

SM 10/21/88
Ch# 102977

Received
AD

10/15
Felix

93043501522

VOICE

EPV
Promo
10K commitment



A PUBLICATION OF PANAGRAPHICS, INC.
774 Fillmore Ave., Buffalo N.Y. 14212 • (716) 852-8211

Bush/Quayle '88
733 15th St. N.W., suite 600
Washington, D.C. 20005
Attn: Eva Netterowicz

REFER TO THIS NUMBER, No 0791
RETURN DUPLICATE WITH PAYMENT

DATE	CUSTOMER ORDER NUMBER	CUSTOMER TELEPHONE NUMBER	SALESPERSON	CASH	C.O.D.	CHARGE	ON ACCT.	PAID OUT
10/13/88		202-624-8601	ks					
CODE	QUANTITY	SIZE	DESCRIPTION				UNIT PRICE	AMOUNT
ADV	1-1	4x8 (1/2 pg.)	DISPLAY ADVERTISEMENT, NOVEMBER 1988, National Edition, Campaign Ad				192.00	
<p>*AD MUST BE PRE PAID PRIOR TO PUBLICATION* REMIT ASAP!!!!!!</p>								
PLEASE PAY THIS INVOICE • NO STATEMENT WILL BE ISSUED UNLESS REQUESTED IN ACCORDANCE WITH OUR STANDARD TERMS. A CHARGE OF 1 1/4% PER MONTH WILL BE MADE ON PAST DUE BALANCES.							TOTAL INVOICE \$ 192.00	

PAID

Jan 10/19/88

Ch # 102784

Polish Americans, church news, ...
Spoke at Wroblewski, managing ed.
- Larry
- ad will appear on Nov 1 ed.
- will send me an invoice
- will send me a copy of tabloid

PAID

Jan 10/19/88

Ch # 102784

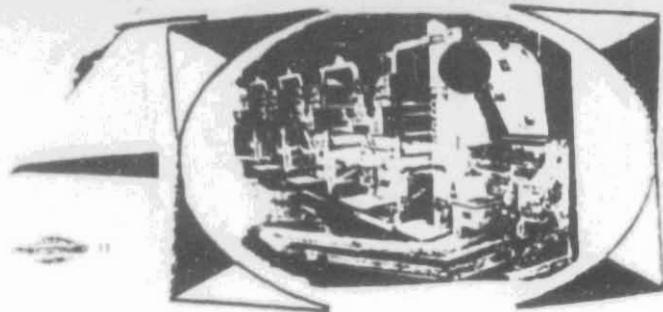
Received
AD

RECEIVED
AD

1/2 page ad 10 1/4" x 8"

10/15-FOOT

11
3043501



Polish Weekly Straz

OKSPV

Promo

1004 pittston avenue. scranton, penna. 18505

phone 347-1911

Ms Eva Neterowicz
Bush-Quail '88
733 15th St NW Suite 600
Washington, DC 20005

October 11, 1988

DATE OF INSERTION	SPACE	TOTAL	RATE	TOTAL
October 27, 1988	1/2 page	73 1/2"		\$140.00

PAID

Jan 10/19/88

CL#102782



1/2 page: 10 1/2" deep x 14" w

POLISH DAILY NEWS

DZIENNIK POLSKI

PHONE: 366-4900

19600 VAN DYKE AVE.

DETROIT, MICH. 48234

OK EPI

— Demo

(ZSC COMM)

Eva Neterowicz
BUSH = QUAYLE... '88
733 15th Street N.W.
Suite 600
Washington D.C. 20005

(202) 624-8601
Ext. 5045-6

1988 Oct.

TERMS: NET 15 DAYS

DESCRIPTION	RATE	INCHES	CHARGES	CREDIT	BALANCE
October 26, 1988 Political Adv. 1/2 page			382.50		382.50
<p>PAID <u>Jan 10/19/88</u> Cl# 102785</p>					

THE LAST AMOUNT IN
THIS COLUMN
IS YOUR BALANCE

POLISH DAILY NEWS

1/2 page = 13" wide x 10"

RECEIVED
AD

10/15
F227

93043501525

93043501526

93043501527

Bush 88 Quayle

October 12, 1988

MEMORANDUM TO: ALL NATIONAL AND STATE COALITION LEADERS

FROM: CECI COLE MCINTOSH
DIRECTOR FOR NATIONAL VOTER COALITIONS

As we head into the last three and a half weeks of the campaign, I thought it might be useful to reiterate certain important principles and constraints imposed by Federal election law on Bush-Quayle coalition activities. While these requirements and limitations are no doubt familiar to most of you by now, they bear repeating to help ensure that the campaign is protected against any allegations of wrongdoing in these final, critical days.

First, we should always bear in mind that Bush-Quayle and Victory '88 are separate and distinct activities, subject to different legal requirements, performing different functions and serving related but independent purposes. Individual coalition members, like other volunteers (and unlike Bush-Quayle staff), may at different times act on behalf of either Bush-Quayle or Victory '88. You may not, however, act on behalf of both entities at one time. When you act on behalf of Bush-Quayle, you should always be mindful of the special constraints and requirements that Federal law as well as Bush-Quayle campaign policy place on your activities. If and when, on your own, you act in support of Victory '88 you should bear in mind that you are not at that point representing Bush-Quayle, as a Coalition member or otherwise.

All coalition members should bear in mind the following rules as they engage in various campaign activities:

1. Direction and Control of Victory '88

While Victory '88 offices are properly coordinating their activities with the campaign, all authority for Victory '88 programs and expenditures properly rests with state party officials.

2. Fundraising

Any fundraising activity may be undertaken only by Victory '88, not by Bush-Quayle or its representatives. While you as a campaign volunteer are free, on an individual basis, to assist Victory '88's fundraising

Memorandum to All National and
State Coalition Leaders
October 12, 1988
Page 2

efforts, it should be understood that you are not doing so on behalf of Bush-Quayle. Furthermore, any funds raised for state party Victory '88 accounts may not be specifically "earmarked" for Bush-Quayle expenditures. Obviously funds must be raised in accordance with the applicable Federal and state laws: Victory '88 legal counsel should be consulted as appropriate.

3. Travel Expenses

Travel expenses of Bush-Quayle employees and representatives must be paid by the campaign or (within a \$1000 per person ceiling) by the traveling individuals themselves. Victory '88 funds may not be used to pay for the travel of Bush-Quayle employees and representatives. Victory '88 may offer to pay for travel of individual Bush-Quayle coalition members, and such travel expenses may be accepted, only in those circumstances where the individual is appearing on behalf of Victory '88, the Republican National Committee or some other entity, not on behalf of Bush-Quayle. (A memorandum on the travel expenses of Bush-Quayle representatives is attached.)

4. Pamphlets, Brochures and other Distributional Materials

Victory '88 may reproduce Bush-Quayle campaign materials for dissemination by Victory '88 volunteers as Victory '88 deems appropriate (with appropriate disclaimers by Victory '88). Victory '88, however, should not be asked to pay Bush-Quayle bills for materials being prepared by Bush-Quayle coalitions for Bush-Quayle use.

Legal Guidance

State party officials and their legal counsel are working to ensure that Victory '88 activities are undertaken in accordance with applicable legal requirements. Questions regarding Victory '88 activities should be directed to them. All questions concerning the legal authority for Bush-Quayle coalition activities should be directed to the office of Jan W. Baran, General Counsel to Bush-Quayle: (202)383-4041. No one is authorized to provide legal advice or representation to Bush-Quayle without prior clearance by the General Counsel.

BEFORE THE FEDERAL ELECTION COMMISSION

City of Washington)
District of Columbia) MUR 2767

AFFIDAVIT OF MARK HOLMAN

MARK HOLMAN, being first duly sworn, deposes and says:

1. I am Mark Holman. I served as Deputy Director, National Voter Coalitions for Bush-Quayle 88, Inc., the general election campaign committee ("Campaign" or "Committee") of Republican Presidential candidate George Bush and Vice Presidential candidate Dan Quayle. This affidavit will serve to provide additional information requested by the Federal Election Commission in Interrogatories issued on November 27, 1990.

2. The National Voter Coalitions placed advertisements in each of twenty-five different ethnic newspapers. The list of these newspapers is as follows:

Dziennik Zwiazkowy (Polish)
Fra Noi (Italian)
Italian Tribune News (Italian)
Post Eagle (Polish)
Szabadsaq/Nepszava (Hungarian)
American Home (Slovenian)
Il Progresso (Italian)
Nowy Dziennik (Polish)
Svoboda (Ukrainian)
Armenian Reporter (Armenian)
Armenian Life Weekly (Armenian)
Armenian Observer (Armenian)
Nor Gyank (Armenian)
Armenian Mirror-Spectator (Armenian)
Asbarez (Armenian)

93043501530

Italian Times (Italian)
South Philadelphia American (Italian)
Sons of Italy Times (Italian)
Relax (Polish)
Gwiazda Ploarna (Polish)
Panorama (Polish)
Polish American World (Polish)
Polish American Journal (Polish)
Straz (Polish)
Polish Daily News (Polish)

93043501531
These advertisements were all to run toward the end of October or the beginning of November, depending upon the newspaper's publication schedule. There were only three versions of the advertisement. One captioned "George Bush Shares The Values Of Ethnic Americans;" one captioned "George Bush Shares The Values Of Polish Americans;" and one captioned "George Bush Shares The Values Of Italian Americans." The National Voters Coalitions Office did not have copies of the advertisements as placed. However, attached at Exhibit 1 are copies of each advertisement sent to the National Voter Coalitions Office by George Bush's supporters. These include a copy of each of the three versions of the advertisement.

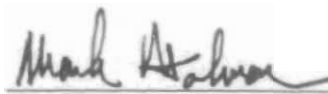
3. The National Voter Coalitions Office intended to distribute between three and five editorials for voluntary publication by the ethnic newspapers receiving copies of the editorials. Two such editorials entitled "Anniversary of Evil -- Reminder of Freedom's Price," and "Our Values Make America Great" were distributed on October 10, 1988. Three other editorials were distributed on October 25, 1988. These

were entitled "The Unraveling of America"; "Massachusetts Miracle . . . Or Mirage"; and "The Reagan-Bush Record: Peace, Pride And Prosperity." There were no identifiable costs associated with any of these editorials other than the cost of postage which would have been de minimus, and not separately recorded. Copies of these editorials are attached at Exhibit 2.

4. Copies of each of the weekly mailings as they were in my files have been attached at Exhibit 3.

5. In my previous affidavit I stated that "Mr. Zogby was responsible primarily for drafting the weekly informational mailing[s]." Aff. at ¶ 10. I reviewed and revised all such mailings and was the only other individual in the National Voter Coalitions Office to do so.

The above information is true and correct to the best of my information and belief.


Mark Holman

DISTRICT OF COLUMBIA

Signed and sworn to before me
this 11th day of January, 1991.


Notary Public

My Commission Expires:

July 14, 1994

93043501532

93043501533

George Bush Shares The Values Of Polish Americans

*"It's not the language we speak, but
the values we share."*

*George Bush
August 2, 1988*

On Tuesday, November 8, the American people will vote to set the course for America to meet the challenges of the 21st Century. George Bush's message for the future of this great and good country is clear: **I WILL KEEP AMERICA MOVING FORWARD.**

ON A STRONG AMERICA — George Bush provides the experience and leadership for a strong national defense and a steady, even-handed foreign policy — the principle guarantors of freedom and peace.

ON A PROSPEROUS AMERICA — George Bush knows that the best jobs program is one that keeps the economy strong, our workers employed, and makes American enterprise leaner, tougher and even more competitive.

ON POLAND — George Bush is committed to direct an effective support for the Polish nation in its striving for freedom, prosperity and peace, for its rightful place in the family of Europe.

George Bush's stand on these issues represents a commitment he shares with Polish Americans, whose faith and patriotism, whose sense of family and personal honor, have helped shape the spirit and character of America.



The Bush Family

**Vote November 8 For
Opportunity, Security and Values.
George Bush For President.**

George Bush Shares The Values Of Ethnic Americans

"It's not the language we speak, but the values we share."

*George Bush
August 2, 1988*

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ON THE CAPTIVE NATIONS — Recognizing that the ancestral homelands of millions of Americans remain bound and captive, George Bush will continue to strive for the cause of national rights and true self determination for all nations in a peaceful world.

George Bush's stand on these issues represents a commitment he shares with Americans of all ethnic backgrounds, whose faith and patriotism, whose sense of family and personal honor, have helped shape the spirit and character of America.



The Bush Family

**Vote November 8 For
Opportunity, Security and Values.
George Bush For President.**

Paid for by Bush Quayle 88

George Bush Shares The Values Of Ethnic Americans

"It's not the language we speak, but the values we share."

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The Bush Family

**Vote November 8 For
Opportunity, Security and Values.
George Bush For President.**

Printed by Bush Office 88

George Bush Shares The Values Of Ethnic Americans

"It's not the language we speak, but the values we share."

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George Bush's stand on these issues represents a commitment he shares with Americans of all ethnic backgrounds, whose faith and patriotism, whose sense of family and personal honor, he's helped shape the proud character of America.



The Bush Family

**Vote November 8 For
Opportunity, Security and Values.
George Bush For President.**

Published by Bush Quayle '88

George Bush Shares The Values Of Polish Americans

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ON POLAND — George Bush is committed to direct an effective support for the Polish nation in its striving for freedom, prosperity and peace, for its rightful place in the family of Europe.

George Bush's stand on these issues represents a commitment he shares with Polish Americans, whose faith and patriotism, whose sense of family and personal honor, have helped shape the spirit and character of America.



The Bush Family

**Vote November 8 For
Opportunity, Security and Values.
George Bush For President.**

George Bush Shares The Values Of Italian Americans

"It's not the language we speak, but the values we share."

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August 2, 1988*

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ON A PROSPEROUS AMERICA — George Bush knows that the best jobs program is one that keeps the economy strong, our workers employed, and makes American enterprise leaner, tougher and even more competitive.

ON THE FAMILY — George Bush believes that strengthening the community of the family ought to be the first concern of a successful society. Opportunity, hard work and faith in God and family are the building blocks of America's future.

George Bush's stand on these issues represents a commitment he shares with Italian Americans, whose faith and patriotism, whose sense of family and personal honor, have helped shape the spirit and character of America.



The Bush Family.

**Vote November 8 For
Opportunity, Security and Values.
George Bush For President.**

Paid for by Bush Quayle 88.

СВОБОДА, П'ЯТНИЦЯ, 28-го ЖОВТНЯ 1988

Svoboda
Friday, October 28, 1988

George Bush Shares The Values Of Ethnic Americans

*"It's not the language we speak, but
the values we share."*

*George Bush
August 2, 1988*

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George Bush's stand on these issues represents a commitment he shares with Americans of all ethnic backgrounds, whose faith and patriotism, whose sense of family and personal honor have helped shape the spirit and character of America.



The Bush Family

**Vote November 8 For
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George Bush For President.**

Paid for by Bush Quayle '88

0 9 5 1 0 5 2 4 0 3 0 4 3 5 0 1 5 4 0

George Bush Shares The Values Of Polish Americans

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August 2, 1988*

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The Bush Family

**Vote November 8 For
Opportunity, Security and Values.
George Bush For President.**

Asbarez Oct. 21, 1988

«ԱՍՊԱՐԷՋ», ՈՒՐԲԱԹ, 21 ՀՈԿՏԵՄԲԵՐ 1988

George Bush Shares The Values Of Ethnic Americans

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August 2, 1988*

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ON A STRONG AMERICA — George Bush provides the experience and leadership for a strong national defense and a steady, even-handed foreign policy — the principle guarantors of freedom and peace.

ON A PROSPEROUS AMERICA — George Bush knows that the best jobs program is one that keeps the economy strong, our workers employed, and makes American enterprise leaner, tougher and even more competitive.

ON POLAND — George Bush is committed to direct an effective support for the Polish nation in its striving for freedom, prosperity and peace, for its rightful place in the family of Europe.

George Bush's stand on these issues represents a commitment he shares with Polish Americans, whose faith and patriotism, whose sense of family and personal honor, have helped shape the spirit and character of America.



The Bush Family

**Vote November 8 For
Opportunity, Security and Values.
George Bush For President.**

George Bush Shares The Values Of Ethnic Americans

"It's not the language we speak, but the values we share."

*George Bush
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Paid for by Bush Quayle 88

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The Bush Family

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George Bush For President.**

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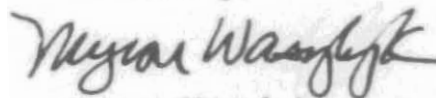
October 10, 1988

Dear Editor:

Enclosed are two in a series of columns authored by Vice President George Bush, highlighting his views on issues of concern in this election.

Your consideration of these articles for publication will be greatly appreciated.

Sincerely,



Myron Wasylyk
Coalition of American
Nationalities

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ANNIVERSARY OF EVIL -- REMINDER OF FREEDOM'S PRICE

September 17th passed uneventfully this year. Few remembered that it was the anniversary of one of the darkest days in the history of mankind.

Forty-nine years ago, two of the most sinister forces on the face of the earth converged on a free and independent Poland. It was on September 17, 1939, that Poland, already reeling from Nazi Germany's onslaught from the west, was invaded by Stalin's Communist forces from the east.

That unholy alliance spawned by the Hitler-Stalin Pact a month earlier dropped a curtain of totalitarianism on Eastern Europe that has yet to be lifted.

Today, the Soviet Union is undergoing Gorbachev's policies of "glasnost" and "perestroika." I hope that there is a genuine change underway in the USSR, and that the nations of Central Europe will be allowed to decide their destiny free of foreign subjugation. But I know the Soviets. We must mix hope with caution. We cannot let our guard down.

During the Carter Administration, America did let its guard down. America's national defense was not maintained. Our economy

stagnated under the burden of double-digit inflation. And Jimmy Carter naively believed the Soviets were just like the family next door -- until they invaded Afghanistan. In those four years, the Soviet Union led communist expansion around the world.

American security and freedom around the world are too precious to be squandered at the hands of inexperienced political leaders. President Reagan and I have worked hard to restore America's strength and determination to the conduct of our foreign policy, and we have succeeded. With the support of the American people, we rebuilt our country's defenses and jump-started the U.S. economy.

Working together as a nation of many nationalities, faiths, and viewpoints, we showed the world that America was not a paper tiger. Americans no longer live in fear of Libyan and Iranian terrorists. America no longer apologizes for exerting its power to protect U.S. and Free World interests.

Now, Soviet expansionism is in retreat in Afghanistan, Grenada and Angola. Only in Nicaragua, thanks to the Democrat-controlled Congress, have the Communists had any success. The Soviets now know they must negotiate with an America of strength, not weakness. America and its citizens are respected again.

In this election year, the American people are faced with the question -- "Do we carry on and expand the Reagan legacy under George Bush or do we return to the Carter years with a candidate that promises competence but delivers crisis?"

I am the only Presidential candidate that offers the leadership and foreign affairs experience essential to maintaining America's national defense.

As a teenager, I fought for America in World War II. As an adult, I was honored in serving my country again as Ambassador to the United Nations.

I am the only candidate for President who has experienced the evils of communism firsthand. As Ambassador to the People's Republic of China, my family and I actually lived in a Communist country. After I returned to the United States to serve as Director of the Central Intelligence Agency, I learned even more about the devious methods of our adversaries.

In defending U.S. interests as Vice President for the past eight years, I have dealt with the Soviet leadership firsthand. Gorbachev is the most savvy, most competent leader the Soviet Union has produced in decades.

During this period of potential change in the Soviet Union, America needs a President who understands world affairs, who understands the Soviets and who has the conviction to stand up for the interests of America and the Free World.

I am the only candidate for the Presidency who is prepared for that task. As President of the United States, I will provide the leadership to continue strengthening our country through programs that have brought America unprecedented peace and prosperity for the past eight years.

end

OUR VALUES MAKE AMERICA GREAT

As we move into the final weeks of the 1988 Presidential campaign, one thing is becoming increasingly clear -- this election will determine the values that will guide our country into the 21st century.

The values that have driven the Reagan-Bush Administration for the past 8 years are the traditional, proven ones that have worked to make America the greatest country on earth. I believe that most Americans continue to share those values. As President, I will continue to offer moral leadership and stand up for the traditional values: respect for the individual, focus on family, and belief in God, who expects us to treat our neighbors with the same compassion as we would want to be treated.

When people lose touch with these basics, they open the door to crime and drugs; education and self-development are shunned, and moral decay and defeatist attitudes set in.

Americans don't want to be guinea pigs for discredited liberal social theories. We don't want to slide back into the failed policies of the past.

Consider, for example, the fight against crime. It is true that rehabilitation is important, but more important is keeping

hardened criminals behind bars so they can't hurt innocent people again.

I am opposed to prison furlough programs like the one Governor Dukakis has supported in Massachusetts that allowed first-degree murderers not eligible for parole out into society for weekend "recreation." That liberal Massachusetts program resulted in the freeing of a first-degree murderer, not eligible for parole, who brutally raped a Maryland woman and tortured her fiance. The Maryland judge refused to allow the man to be returned to Massachusetts for fear he would be let out again.

I want to achieve a drug-free America. That is not as simple as intercepting drug shipments entering our shores. We have to continue those programs, but we also need to strengthen our moral fiber so America's children will say "NO!" to this scourge on their futures.

The first step is recognizing the problem. That problem is a liberal ideology that says: "Everything's okay, it's all relative." I don't agree with this liberal view of the world. I believe that certain things are right, and certain things are wrong.

I believe a good education is essential to give our children a sense of self-worth and achievement. I will encourage federal programs that are designed to assist local efforts. I want to continue to get federal bureaucrats out of micromanagement of local schools. I want to put parents back in charge of their children's education.

I believe in the value of an honest day's work. I became a success as a businessman and in government service through hard work. We have to instill in our children renewed respect for the work ethic.

Immigrants to our shores know America is the land of opportunity. I will stand behind government policies that encourage and reward our citizens who are willing to work and contribute to keeping America great. And I will oppose government intervention that penalizes productive citizens and rewards those who make a career out of manipulating federal largess.

But I recognize that not all Americans are endowed with the same skills and values. We need to reach out to the disadvantaged and those suffering tragedy and setbacks.

In the final analysis, the best antidote to the welfare cycle that has trapped many Americans is jobs. I will continue the policies and programs of the Reagan-Bush Administration which have brought America the longest period of peace and prosperity in our history.

And I will work for a government that is fair, but compassionate -- a society that is kinder and gentler. I will promote programs to lift up the disadvantaged and show them the way to share fully in the fruits of our society.

The traditional values of hard work, respect for the individual, focus on the family and belief in a loving God made me what I am today. Belief in these values made America the greatest nation on earth. These values drew millions of immigrants to our shores -- people who wanted to lead a good life, not just in material terms, but in spiritual terms as well.

I join you in the hope that these values will continue to enlighten our lives, and our country will continue to be a light to the world.

end

Paid for by Bush-Quayle '88

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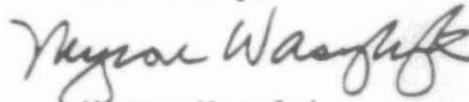
October 25, 1988

Dear Editor

Enclosed are three more in a series of columns authored by Vice President George Bush, highlighting his views on issues of concern in this election

Your consideration of these articles for publication will be greatly appreciated.

Sincerely,



Myron Wasylyk
Coalition of American
Nationalities

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THE UNRAVELING OF AMERICA

"This campaign is not about ideology . . . It is about competence."

Michael Dukakis (7/12/88)

"The truth is, this election is about the beliefs we share, the values we honor, the principles we hold dear . . ."

George Bush (8/15/88)

It is no accident that Michael Dukakis wants to minimize the importance of values and beliefs in this election year. For I am convinced that if Americans take a close look at the differences between Governor Dukakis and myself in these weeks, we will win in November.

I have called my opponent the "stealth" candidate because his platform lacks substance and specifics. But I am less concerned with what his platform says -- than what it does not say. Mr. Dukakis does have an agenda. He simply doesn't want it revealed until after Election Day.

So who is the real Michael Dukakis, and where would he lead the country?

Dukakis has already provided the answer: "I am a liberal ... progressive Democrat ... I am a card carrying member of the

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American Civil Liberties Union (ACLU)." This boast, combined with his support of George McGovern and his lifetime affiliation with the left wing of the Democratic Party, places him far to the left of most presidential candidates in our history.

What does this liberal affiliation mean? It means a rejection of traditional values and standards. It means furloughed criminals not eligible for parole prowling our streets. It mean additional restraints on law enforcement agencies in bringing drug traffickers to justice. It means a vastly enlarged federal bureaucracy -- spending, taxing and regulating us to no end. Indeed, it means a concerted assault on all public expressions of religious beliefs, refusing our schoolchildren the chance to observe a moment of silence or prayer each day.

And in policy, it means blindly sacrificing national sovereignty and interests to international organizations and multi-national demands. It means a breakdown of our intelligence capability abroad. It means the betrayal of freedom fighters seeking to overthrow communist regimes. It means the lessening of pressures on the Soviet Union and East European regimes for arms reduction and further internal reforms. It means the unilateral abandonment of our programs to modernize major strategic weapon systems.

My opponent's record on these issues is incomplete and not at all reassuring. In 1970, he introduced bills to wipe out state laws against abortion. He presided over the steepest increases in taxes and spending confined to any state in the United States. In the last three years alone, his prison furlough program was the only one in the nation that permitted weekend passes for first-degree murderers serving life in prison without parole. He vetoed mandatory jail sentences for convicted drug pushers. He supports federal funding for abortion. He

vetoed legislation requiring teachers to lead the Pledge of Allegiance in public schools.

But most disturbing -- and, perhaps, most revealing -- are the comments of his close supporter, Representative Peter Kostmayer (D-PA), who, in addressing special interest constituents, cautioned them: "We're not going to blow it this time. Just shut up, gays, women, environmentalists. Just shut up. You'll get everything you want after the election. But just, for the meantime, shut up so we can win."

No wonder Dukakis is so determined to avoid issues. The policies he would have to defend -- big government, irresponsible foreign policy, and an assault on the values that have made this nation great -- continue to be repugnant to the overwhelming majority of Americans.

end

MASSACHUSETTS MIRACLE ... OR MIRAGE

My opponent has claimed responsibility for the "Massachusetts Miracle" -- a booming economy, strong job market, sound fiscal management, fair taxes, and a clean and open government. Now, it's time to give the American people the facts -- not the public relations mirage.

The Governor boasts that he has balanced his state's budget for fiscal 1988 -- his tenth "balanced budget" in a row. First, in Massachusetts the law requires him to put forward a balanced budget, second, as Dukakis has proven repeatedly, "balancing the budget" in Massachusetts is robbing Peter to pay Paul: issuing bonds to finance scheduled maintenance, raiding items like the "pothole fund," and pirating the state pension accounts. Such actions have left Massachusetts on the brink of fiscal catastrophe. The state has had to borrow almost \$1 billion in short term notes since June just to keep itself financially afloat and look good before the voters. My opponent has, in fact, created more debt than all previous governors of Massachusetts combined.

The Governor's claim that he's created good jobs for blue collar workers is just not so. The state has lost 91,400 manufacturing jobs since 1984, and job growth in Massachusetts since 1984 has been 30 percent below the national average. Over the last 12 months, Massachusetts has ranked 10th out of the 11 industrial states in total job growth.

Embarrassing for the Governor must be a recent Harvard study

that says he had little to do with the revival of the Massachusetts economy. Building on an already existing base dominated by high technology and the defense industry, Massachusetts has simply ridden the wave of prosperity of the Reagan-Bush years, in large part because it snagged 40% of the Pentagon's annual \$2.5 billion research and development budget. My opponent, who on the national scene never tires of taking potshots at the defense buildup, should not claim credit for those revenues.

Depicting himself as a careful manager, the Governor is in fact a runaway spender. Under his administration, state spending since 1983 has risen at its fastest rate in history -- a whopping 50% faster than the combined states' average and more than double the rate of federal spending.

Fueling the spending surge have been experiments in big government like the Dukakis health-care scheme which will cost Massachusetts businessmen (not to mention taxpayers) \$600 million in higher benefit costs. The spending spree has also swelled the states workforce with 10,000 new employees, an exercise in bureaucracy run amok that has added \$900 million in new expenditures to the state budget and has made even shakier Massachusetts' ailing pension fund.

My opponent's record on the taxes needed to pay for this kind of management speaks for itself. Today Massachusetts taxes are 43% above the national average -- the 4th-highest of the 50 states. The Governor has engineered the steepest tax increases in the state's history.

We have problems on the federal level to be sure. Budget deficits are my biggest concern. But unlike my opponent, who has enjoyed the support of a majority in his state legislature, we have had to manage the federal budget against a hostile and often

confrontational Democratic Congress that has refused to restrain the growth of federal spending. And despite this, the Reagan-Bush administration has succeeded in providing unprecedented prosperity, growth and the restoration of our national strength and pride.

Voters need full disclosure of the record if they are to distinguish between the myth and the man who has pledged that if elected, "I will do for America what I have done for Massachusetts."

end

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THE REAGAN-BUSH RECORD: PEACE, PRIDE AND PROSPERITY

In 1984 when former Vice President Mondale selected Congresswoman Geraldine Ferraro as his running mate, the "experts" predicted that Mrs. Ferraro, a first generation Italian-American, would attract vast numbers of ethnic voters, many of whom had supported Ronald Reagan and me in 1980. Needless to say, the pundits were surprised on Election Day 1984, for not only did the Reagan-Bush ticket win a majority of ethnic voters -- but we won an even greater percentage than in 1980.

As Election Day 1988 nears, we can learn a lot from the results of past elections. I believe that proud ethnic Americans are also wise ethnic Americans -- they don't vote for a candidate because of his or her name, but because the voter believes in a candidate's values and goals for America. Since 1981, President Reagan and I have worked tirelessly to not only defend, but to expand freedom throughout the world, while at the same time ensuring economic opportunity at home.

Looking toward Europe, we see that NATO has never been stronger. Knowing that a steady hand is guiding Washington, our NATO allies remain assured of U.S. commitments to Western Europe. In the last eight years, our leadership and the constant

demonstrations of mutual trust between the U.S. and our allies have enhanced U.S.-NATO relations.

Indeed, the U.S. would have never been able to negotiate a successful INF Treaty -- which eliminated an entire class of nuclear missiles -- without British, West German, Dutch, Belgian and Italian commitments to accept our Pershing and cruise missiles. And it was the United Kingdom, Italy, Belgium, Holland, West Germany and France which sent their navies to the Persian Gulf to assist the safe escort of merchant ships through international waters.

A strong and healthy Alliance serves not only as a deterrent to the Soviets, but also as a model. I can't help but believe that the prosperity of America and her Allies has been a challenge to the Soviets, forcing Mr. Gorbachev to institute his policies of glasnost and perestroika in order to catch up with Western economic advances.

While dealing with the Soviets we must always remain vigilant. We must never compromise our commitment to the defense of freedom and human rights. We must meet and talk with the Soviets, as long as the talks are frank and do not gloss over our real differences. Our repeated insistence that the Soviets open their doors to increased emigration and family visits has

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resulted in a flood of travelers from the Soviet Union and Eastern Europe. Due to our determination and commitment to human rights, political prisoners such as Natan Scharansky, Vytautas Skuodis, Yury Orlov and Petro Ruban are now free. We must keep the pressure on the Soviets until all prisoners of conscience are released and able to live without fear of harassment and persecution.

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The American people must never doubt the commitment of their President to the defense of freedom and national self-determination. It was not long ago that the term "Captive Nations" was considered "unfashionable" by Washington insiders. That was before 1981. Since then, as a demonstration of our support and commitment to the Captive Nations Week Law, the President or I, have presided over a public Captive Nations Week ceremony every year along with the participation of top Administration officials and freedom fighters the world over.

Strong words must be matched by decisive action. As President Reagan has often said, since 1981 not one inch of territory has been lost to communism. America has come to the direct aid of Grenada, Afghanistan and Angola. On the other hand, however, Governor Dukakis opposes aid to the freedom fighters of Nicaragua. What kind of signal does that send to

those who thirst for freedom in Poland, Czechoslovakia and Ukraine?

America can be proud of her achievements abroad but our national pride must be based on a solid and stable economic foundation. The Reagan-Bush policies have given this country the longest period of peacetime economic growth. Inflation is not an issue in this campaign. Neither are skyrocketing interest rates or rising unemployment rates. We are the economic envy of the world.

Immigrants and refugees come to America to build a better life for themselves and their families. Since the start of the economic recovery, ethnic American families have been able to plan their economic futures knowing that inflation and increasing federal taxes will not rob them of their hard earned savings.

In my years in public life, I have visited many ethnic communities and know that you take pride in your ethnic heritage just as you share the dream of a better America and a better world through American leadership. We must not lose our economic strength and our international leadership as we did a decade ago. Dan Quayle and I will build on that strength and provide the leadership to ensure that America remains both an economic showpiece and a beacon of freedom as we enter the 21st century.

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Bush 88 Quayle

733 15th Street, N.W.
Suite 800
Washington, D.C. 20005
202/842-1988

ISSUE NO. 1

SEPTEMBER 14, 1988

WELCOME to the winning Bush '88 Coalition of American Nationalities team. This issues bulletin begins a first in a series of weekly mailings that you, as a member of our national leadership, will receive throughout the campaign -- facts, figures, and articles on George Bush's record. We hope that you will use these mailings to bring George Bush's message for the future of America to the voters. [Note: If for any reason, you do not want to be included on our mailing list please let us know.]

THE MESSAGE: SPEAKING OUR LANGUAGE

In his acceptance speech at the Republican Convention George Bush said, "this election is about the beliefs we share, the values we honor, the principles we hold dear." We know that George Bush's commitment to these values, ones we all hold so deeply, is unquestioned. We know George Bush because he speaks our language.

- * George Bush is committed to preserving the peace -- through a strong American defense. George Bush speaks for freedom, stands for freedom and is a friend to those willing to fight for freedom.
- * George Bush is committed to keeping our national economy on the path that has created 17 1/2 million new jobs, producing hope and opportunity for our children to assure them their realization of the American dream.
- * George Bush believes a solid education is the key to our children's future and is committed to an educational system that puts power in the hands of parents and not the federal government. George Bush is also committed to ridding our society of the drug dealers that seek to poison young minds.

George Bush has set out this vision of America, a great land of hope and opportunity. It is our task to carry this message into the stores, businesses, churches and neighborhoods. With your continued leadership, support and commitment, we can together insure a victory in November and the fulfillment of George Bush's "mission" -- for Americans of all nationalities.

ORGANIZATIONAL NOTES

As members of the nationalities leadership, we must focus on

the major organizational tasks essential to our victory on November 8th. Knowing that you are anxious to assist George Bush in every possible way, we offer the following suggestions:

1) Please inform us of major events where we can bring the message of George Bush to your community -- through a surrogate speaker or a message of greetings from the Vice President.

2) We are committed to organizing the most effective grassroots campaign possible. We look to you to recruit the workers at the local level. We will assist you in plugging these workers into the state nationality campaign organizations.

NEWS AND INFORMATION

You are the campaign's and the Coalition's best source of information for what is happening in the communities -- where it really counts! Please call us or send us newspaper clippings, editorials, letters to the editor, reports of media coverage, or just talk from the neighborhood. You can send us copies of materials directly via a FAX machine by calling 202/624-8823.

CAMPAIGN STAFF

The staff of the Bush-Quayle '88 Coalition of American Nationalities is here to assist you in bringing our candidate's message to the voters. The Coalition Directors are:

* Andrew Falkiewicz	* Eva Neterowicz
* Myron Wasylyk	* Charles Zogby
* Mark Holman, Deputy Director, National Voter Coalitions	

Remember we are here to help you. If you need any information or assistance -- please call us directly at (202) 624-8601.

* * * *

THE ISSUES

George Bush has appropriately labeled his opponent as the "Stealth" candidate, flying from place to place but with no issues ~~showing~~ up on the radar screen. The reason the Democrats do not run on the issues is because they are afraid the American people might find out what they are all about and what policies they will bring to Washington.

In a moment of truth, Democratic Congressman Pete Kostmayer laid out his Party's strategy for the fall campaign when he said, "We're not going to blow it this time. Just shut up, gays, women, environmentalists. Just shut up. You'll get everything you want after the election. But just, for the meantime, shut up so we can win."

THE ECONOMY
The Record vs. the Mirage

Important to remember is that while the Democratic nominee and the Democratic Party talk, **GEORGE BUSH AND THE REPUBLICANS DELIVER.** The Democratic nominee and the Democratic Party promise, **GEORGE BUSH AND THE REPUBLICANS PERFORM.** Now the Democrats want to be back in office, to take away America's economic recovery, to take away our nation's strength. The Democratic nominee and the Democrats threaten the gains of the last eight years, but **GEORGE BUSH WON'T LET THEM TAKE IT AWAY FROM US!**

JOBS

BUSH: The Reagan-Bush Administration has created over 17 1/2 million new jobs, including 99,000 new manufacturing jobs -- with 70% paying an average of \$20,000 a year or more. George Bush intends to continue to deliver **GOOD JOBS AT GOOD WAGES.**

Democratic nominee: Job growth in Massachusetts has been substantially slower than in the nation as a whole, ranking 33rd in job growth since 1981. The state has also lost over 90,000 manufacturing jobs during the last 3 1/2 years, accounting for more than 40% of all manufacturing jobs lost nationally.

TAXES

BUSH: George Bush pledges **NOT TO RAISE YOUR TAXES.** George Bush also supports cuts in the capital gains tax rate and a Taxpayers Bill of Rights to limit the intrusive powers of the IRS.

Democratic nominee: The Governor believes that taxes can't be ruled out, stating that if we need more revenue, we should tax for it. In Massachusetts, state tax revenue per person has increased by 47 percent -- the fastest in the nation -- and state taxes have grown three times as fast as federal taxes. State tax rules also penalize earners who save.

SPENDING

BUSH: George Bush supports holding the line on federal spending and has proposed a flexible freeze. George Bush rejects the tax-spend, tax-spend policies of previous Democratic Administrations that brought 12% inflation and interest rates at 21%.

Democratic nominee: According to Business Week, Massachusetts spending ranked first in growth nationwide between fiscal 1983 and 1988. The Governor has endorsed pending legislation which will cost the federal government over \$50 billion over four years, with additional costs to businesses of \$200 billion over four years.

Bush 88 Quayle

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202/842-1988

ISSUE NO. 2

SEPTEMBER 16, 1988

VICE PRESIDENT GEORGE BUSH received the strong endorsement and support of thirteen prominent national security experts and public officials in announcing the Bush '88 National Security Advisory Task Force.

The task force is co-chaired by Dr. Zbigniew Brzezinski, national security advisor to former President Carter, who praised the Vice President as the man who "has been tested in the international arena and has a wide ranging grasp of international realities. I intend to support his drive for the Presidency." Mr. Brzezinski noted that Bush's opponent's "view of the world is basically out of touch", terming it "closer to Jesse Jackson and Jane Fonda."

With Michael Dukakis, every time the polls change, so does his stand on the defense issues. Take this past week, for example: Two new polls came out showing he's perceived as weak on defense, so he immediately endorsed a long list of weapons systems. Then -- once he caught his breath -- he proclaimed, "We're not going to have a laundry list of weapons systems." Afterwards, he climbed into an MA tank for a photo opportunity.

But sitting in a tank does not make America stand tall.

Michael Dukakis' addresses on foreign policy are a camouflage. He tries to wrap himself in the rhetoric of a strong defense in an effort to fool the voters. But he has criticized our defense too many times. He blamed America first too many times. And he has flip-flopped and waffled too many times. We know Dukakis' conversion doesn't signal genuine support for a strong defense. Rather, it's more like another SDI -- the Save Dukakis Initiative.

We know who's got the experience to lead our nation through the delicate and dangerous world of foreign affairs. That man is GEORGE BUSH. George Bush believes in peace through strength. He's the one who has articulated a consistent no-nonsense, coherent foreign policy for the last eight years.

* * * VIEWER'S GUIDE TO THE DUKAKIS WEAPONS WAFFLE * * *

Use this handy guide to keep the latest Dukakis foreign policy at your fingertips. Positions listed are subject to change without notice. Views expressed are solely those of the candidate, and not those of mainstream America. (** indicates recent flip-flop.)

<u>WEAPONS SYSTEMS</u>	<u>BEFORE</u>	<u>AFTER</u>
SDI **	opposed	supports
Migetman **	opposed	supports
Trident II missile	waffle	supports
Stealth Bomber	waffle	supports
Pershing II	opposed	ignores
MX Missile	opposed	abandon
B1 Bomber	opposed	abandon
Tanks	supports	operates

The fact is that Michael Dukakis has opposed every major weapons system. The weakness, naivete and growing ambiguity of Dukakis' foreign policy are too big a risk for America. He must explain to American voters why he's flip-flopped, and whether his opinion is subject to further change.

Michael Dukakis says he's for democracy and freedom around the world, he says he for a strong defense but the facts paint a different picture. But the reality is that Michael Dukakis:

- o wants to abandon the democratic resistance in Nicaragua and Angola, and accepts the concept of Soviet "client" states in this hemisphere
- o supports removal of U.S. troops from South Korea
- o supports a nuclear freeze
- o proposes to conduct joint foreign aid with the Soviet Union
- o opposed American action in Grenada
- o opposed the U.S. air strike on Libya
- o opposes modernizing our aircraft carrier forces

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The Oval Office is not a classroom for experimental on-the-job training in foreign policy. Experience is important, but good judgment is essential.

Only George Bush has the judgment and the experience to continue the Reagan-Bush legacy of peace through strength.

ORGANIZATIONAL NOTES

As members of the nationalities leadership, we must focus on the major organizational tasks essential to our victory on November 8th. Knowing that you are anxious to assist George Bush in every possible way, we offer the following suggestions:

1) Please inform us of major events where we can bring the message of George Bush to your community -- through a surrogate speaker or a message of greetings from the Vice President.

2) We are committed to organizing the most effective grassroots campaign possible. We look to you to recruit the workers at the local level. We will assist you in plugging these workers into the state nationality campaign organizations.

NEWS AND INFORMATION

You are the campaign's and the Coalition's best source of information for what is happening in the communities -- where it really counts! Please call us or send us newspaper clippings, editorials, letters to the editor, reports of media coverage, or just talk from the neighborhood. You can send us copies of materials directly via a FAX machine by calling 202/624-8823.

CAMPAIGN STAFF

The staff of the Bush-Quayle '88 Coalition of American Nationalities is here to assist you in bringing our candidate's message to the voters. The Coalition Directors are:

- | | |
|---|------------------|
| * Andrew Falkiewicz | * Eva Neterowicz |
| * Myron Wasylyk | * Charles Zogby |
| * Mark Holman, Deputy Director, National Voter Coalitions | |

Remember we are here to help you. If you need any information or assistance -- please call us directly at (202) 624-8601.

* * * *

NOTE: IF THIS IS YOUR FIRST COPY OF OUR WEEKLY MAILING, PLEASE HELP US IN GETTING THIS INFORMATION OUT BY CIRCULATING IT AMONG FRIENDS, NEIGHBORS, ETC. WE WOULD APPRECIATE ANY AND ALL ASSISTANCE IN GETTING THE MESSAGE OUT TO YOUR COMMUNITIES.

Paid for by Bush-Quayle '88

GOP courts Ohio's ethnic vote

Bush hopes tough Soviet talk appeals to European heritage

By STEVE LUTTNER

POLITICS WRITER

It wasn't difficult for Vice President George Bush to excite the crowd at Donauschwaben's German-American Cultural Center in Olmsted Township last night.

With national news cameras whirring, the Republican presidential candidate played to what's known in Greater Cleveland as the ethnic vote — people with Central or Eastern European roots who often harbor strong suspicions of the Soviets and are sometimes described as having conservative views on other issues.

Ethnics represent a large number of voters in Ohio, a state deemed pivotal to the presidential campaigns of Democratic presidential nominee Michael Dukakis as well as Bush.

While Dukakis is the son of poor immigrants who came to the United States and fulfilled their dreams, Bush last night punched a lot of sensitive buttons. He won cheers as he repeated his pledge not to raise taxes, promised to continue a strong national defense and said he supported capital punishment.

Many of the loudest cheers came when he expressed his distrust of the Soviet Union.

"I am one who does not believe there is fundamental change yet in terms of the philosophy of the Soviet Union," Bush said. "So I want to keep our country strong, my eyes wide open and say to the Soviets, 'If change is real, let's see a little more freedom in Eastern Europe.'"

Bush met privately before his speech with

about 35 leaders of various ethnic groups from the Cleveland area. Bush and his running mate, Sen. Dan Quayle, are scheduled to attend Mass this morning at Transfiguration Catholic Church on Broadway. Bush will meet later with Polish-American leaders.

Paul Mifsud, vice-chairman for Bush's campaign in Ohio, said the heavy emphasis on ethnic voters in Cleveland is easily explained. He said a third of Ohio's residents claim German roots. Another large chunk have Polish backgrounds.

Mifsud said Mayor George V. Voinovich, who appeared with Bush last night, helps Bush with ethnic voters in northern Ohio. He said he hoped Bush will return the favor by appearing with the Senate candidate in southern Ohio, where Voinovich needs to improve his name recognition in his race against Sen. Howard Metzenbaum, D-O.

Former Mayor Ralph Perk, a Republican, said ethnic voters will most likely support Bush over Dukakis even though Dukakis is a first-generation American. "They feel he is strong on defense, and that is certainly important for peace and security," said Perk, who is ailing and attended the rally in a wheelchair.

"He (Dukakis) has never done anything for the ethnics. He's extremely liberal. Our people are conservative. They don't want a guy who's going to be letting criminals out on weekends to rape their daughters."

Although Bush didn't put it so strongly, he painted Dukakis as being weak on criminals and constantly described himself as being dedicated

to preserving a strong defense.

Quayle tantalized the crowd with, "Perhaps under a George Bush administration, we can see the Berlin Wall come down."

Ethnic leaders later said that would be a tall order, but there is little doubt that Bush — who is working against great odds in heavily Democratic Cuyahoga County — has at least a small group of ethnic supporters.

Steve Toth, who attended the private meeting with Bush, said "Dukakis doesn't realize the problems in Europe. ... we need a man with more experience. Dukakis just doesn't have it."

August Pust, Cleveland's director of ethnic affairs, said it was a miracle to get representatives from 30 or more nationalities to unite behind one cause and attend the Bush rally.

But while hundreds cheered last night for the Republican ticket, Cuyahoga County voters traditionally haven't showed much support for Republican presidential candidates.

Since 1968, Democrats carried Cuyahoga County in every election except when Richard Nixon beat George McGovern in 1972. The county's voters are not reflective of the state. Ohio has gone Republican in every presidential contest except in 1976, when Jimmy Carter won.

But Bush, who used two hands to quaff a stein of beer after he finished speaking last night, vowed to return to Cleveland before the election.

Dukakis, meanwhile, is to appear in Cleveland Wednesday.

Staff Writer Sarah Strohmeyer contributed to this story.

Paid for by Bush-Quayle '88

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Dukakis Should Pledge Allegiance to the Facts

By L. GORDON CROVITZ

The Supreme Court of the United States has not had an occasion to consider whether a teacher has a constitutional right to decline to participate in the recitation of the pledge of allegiance to the flag. The Massachusetts Supreme Court wrote in the advisory opinion on which Gov. Michael Dukakis based his 1977 veto of a bill requiring teachers to lead the pledge.

The Massachusetts court went on to note that the 1943 Supreme Court case, *West Virginia State Board of Education v. Barnette*, concerned not teachers but students "under the threat of expulsion for failure to comply" and "who objected to the requirement on religious grounds." Similarly, Gov. Dukakis's attorney general at the time, Francis X. Bellotti, offered an opinion on the 1977 law specifying "the United States Supreme Court has not specifically addressed this question."

Yet the received wisdom seems to be that because of the Supreme Court's *Barnette* decision, the 1977 law was not only unconstitutional but beyond the pale. Commentators everywhere accept Gov. Dukakis's claim that, "It was so held by the Supreme Court of the United States. Any first-year law student knows that." And, if the vice president is saying he'd sign an unconstitutional bill, then in my judgment he's not fit to hold the office.

Saluting a Graven Image

The commentators ought to take the time to read the cases.

To begin with, compulsion was at the heart of the *Barnette* case, which concerned Jehovah's Witnesses students who opposed saluting the flag, which they considered a graven image. (In fact, the students did not object to reciting the pledge.) They were expelled, and their parents were threatened with jail for "causing delinquency."

Justice Robert Jackson's opinion hinged on the fact that students were required by law to attend school. (Felix Frankfurter's forceful dissent upholding the criminal penalty agreed there was coercion, but noted that West Virginia didn't require attendance in the public schools.) The majority held that what was unconstitutional was the one-two punch of state power: "The State asserts power to condition access to public education on making a prescribed sign and profession and at the same time to coerce attendance by punishing both parent and child." As the Massachusetts court and Attorney General Bellotti recognized in 1977, no person is coerced by law to become a teacher.

The facts and precedent most relevant to the law Gov. Dukakis vetoed came in a 1957 New York case, *Lewis v. Allen*. It concerned an effort by parents of school children to force the state to drop "under God," two words added by Congress in 1954, from the required pledge. Judge Isadore Bookstein, the trial judge in Albany, ruled that it is constitutional to require teachers to lead the pledge so long as there is no penalty for students who refuse to recite it.

Judge Bookstein wrote that, in *Barnette*, the United States Supreme Court indicated approval of the congressional enactment of the pledge of allegiance but declared the West Virginia flag-salute law unconstitutional. In that instance, however, the salute to the flag was compulsory.

Dukakis's veto was to protect the careers of teachers who do not believe the United States is one nation, under God, indivisible, with liberty and justice for all.

The regulation under attack in the New York case, Judge Bookstein noted, calls for recital of the pledge, but is constitutional because it "has no compulsory aspect. No penalties attach to a failure or refusal to take the pledge. The pledge is made voluntarily and no penalties are imposed for non-compliance."

Noting that many curriculum materials have religious references, he wrote: "If petitioners' contention be sound, it may be wondered whether the public school curriculum might properly include the Declaration of Independence and the Gettysburg address. Could 'America' (I... Protect us by thy might, Great God, our King!) be sung in a public school without offending the First Amendment? And might not the presidential oath of office have questionable constitutional status?"

When the plaintiffs in the New York case appealed to the U.S. Supreme Court, attorneys general from 29 other states joined to support Judge Bookstein's decision upholding the voluntary pledge. In 1964, the Supreme Court agreed to refuse to hear the appeal. While this is not as powerful a precedent as the court upholding the New York case outright, it left the best law in 1977 and today as holding that a state may require the recitation of the pledge so long as there is no penalty on students who refuse to participate. This is precisely the law that was vetoed by Gov. Dukakis in 1977, then passed over his veto by the Massachusetts legislature.

In his decision to veto a pledge that put

no obligation on students, Gov. Dukakis raises questions about whose interests he was trying to protect. His current attorney general, James Shannon, made clear it was teachers Gov. Dukakis was worried about when he asked the *Washington Post*: "Does George Bush feel that a teacher, who because of religious conviction feels unable to lead the pledge, should end up with a criminal conviction?" Mr. Shannon, to be charitable, apparently hasn't read the cases either.

In its advisory opinion, the Massachusetts Supreme Court noted that the bill included no legal penalty for non-complying teachers. Indeed, the 1977 bill invalidated the previous penalty—a \$5 fine—for teachers who refused to lead the pledge. The bill the governor later vetoed, the ad-

vised to replace an earlier, more coercive law. The older law not only included the \$5 fine, but also required that teachers "shall cause" students to salute the flag and recite the pledge. The vetoed law required teachers only to "lead the class" in a recitation without any salute.

Mr. Dukakis was overridden by lopsided votes of 201-27 in the House and 24-7 in the Senate, yet refuses to enforce the new law. It's unclear which of the two laws is now on the books, but what is certain is that Gov. Dukakis as the chief executive officer of his commonwealth has a constitutional duty to enforce the law. He flouts this obligation by refusing to enforce the pledge law.

He'd better be more careful if he gets to Washington. Congress does not take kindly to presidents asserting the power to modify legislation or use discretion in interpreting its meaning, much less flatly refusing to enforce duly enacted laws.

For the Bush campaign, the point of the pledge issue is to undercut the Democratic nominee's stance as a moderate centrist. Looking at what actually happened in 1977, this seems a fair shot. Or at least the governor has some explaining to do.

Anachronistic Attitudes

The veto was not dictated by any constitutional requirement, but by the governor's desire to protect the career paths of teachers who objected to leading the pledge because they disagreed that this country stands for liberty and justice for all. Such doubts about the United States may have been common in 1977, at least in Massachusetts, but happily they seem anachronistic now. It would clarify matters if Gov. Dukakis and others would simply say they have changed their minds.

Rather than sign a bill that would reduce the pledge duties of teachers and students, the governor chose to seek an advisory opinion, which of course is not an option for a president under the federal Constitution. In his request, he indicated that he opposed any pledge requirement.

After hiding behind judicial robes to veto the pledge, now Gov. Dukakis is hiding behind some shockingly weak legal arguments to avoid defending the position that he actually took—that teachers who do not believe in the words of the Pledge of Allegiance should have their careers protected. So far, the commentators are buying his spurious legal defense of this curious political decision.

Mr. Crovitz is assistant editorial page editor of the Journal.

Ironically, the law he vetoed was sup-

Middlesex News, September 9, 1988

Frank urges gays to back Dukakis

By Edward C. Achorn

NEWS WASHINGTON BUREAU

WASHINGTON — Rep. Barney Frank, D-4th, urged gay rights activists last night to set aside their differences with Michael S. Dukakis when they go to the voting booths in November.

"I don't think it's a bad idea to think about an election as a one-night stand. Just pushing a button for someone doesn't mean you're going to call him in the morning," Frank said, addressing a group of students, activists and visitors at Georgetown University Law Center.

Frank argued that choices for president have been narrowed to two people at this point, and it is up to voters to decide which one of those candidates can better meet their aims.

"To further the analogy a little bit, on Election Day, it's 10 to 2 in the morning and the bar's about to close, and you don't have the choice that you had at 11 o'clock," Frank said.

Gay rights activists have been cool toward Dukakis in the past over his stand against allowing homosexuals to serve as foster parents, and over his failure to push a gay rights bill into law.

Frank sharply criticized Dukakis over the foster-care issue and defended the governor's efforts to push through the right's bill. He also reminded his audience that few political candidates are perfect.

"(Voting) is a thing you approach in a functional way," Frank said.

"I once voted for a perfect candidate — that was me the first time I ran," he said.

"By the time I ran for re-election, to be honest with you, I had a couple problems with my record. But I decided I was the best candidate in the race, so I worked as hard as I could for me anyway," Frank said.

In his speech, Frank argued that discrimination against homosexuals is declining. He credited the organized political effort of gay rights activists with helping move Congress to strike down prejudicial laws against homosexuals.

"The change in attitude among members of Congress between 1982 and 1987-1988 is enormous. People now understand there are more people who are opposed to discrimination and fewer people who are in favor of it than they thought before," Frank said.

During a question-and-answer session, Frank spoke about his concerns when he became the nation's second congressman to openly admit he is homosexual.

"Some of you have had this experience. The period immediately after you come out is not the easiest one," Frank said.

"Having so intimate a part of you discussed by total strangers in an impersonal way doesn't give you a comfortable feeling," Frank said.

Frank said he was particularly



"I don't think it's a bad idea to think about an election as a one-night stand. Just pushing a button for someone doesn't mean you're going to call him in the morning,"

BARNEY FRANK
U.S. REPRESENTATIVE

concerned about his working relationship with colleagues on Capitol Hill. But Frank said he has seen no signs colleagues treat him any differently, or that he has become less effective.

Answering another question from a member of the audience, Frank admitted he has brought a male date along with him to some social functions.

"I think I am entitled to behave the way my colleagues behave," Frank said. "Yeah, when it's appropriate, I behave the way my colleagues behave."

Though the AIDS crisis has prompted some to lash out at homosexuals, Frank argued that "right-wing demagogues" have not hurt the cause of gay rights.

"We should not be afraid of those people," Frank said.

"The more the right wing has come up front, the better off we are ... Pat Robertson's inherent ridiculousness undid him with the American people. Jerry Falwell's been driven out of politics."

Meanwhile, on Capitol Hill, Frank said, Congress prevented discrimination against AIDS victims in two key pieces of legislation.

"Twice this year both the House and Senate have passed legislation protecting people with AIDS and AIDS virus from discrimination in any form of housing but private, and against any discrimination by any recipients of federal money," he said.

Frank argued the next presidential administration holds the key to more progress for gay rights and the fight against AIDS.

"We have been able in Congress to prevent them from doing a lot of bad things. Forcing them to do good things requires a little more

Bush & Quayle

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202/842-1988

ISSUES NO. 3

SEPTEMBER 23, 1988

The traditional ethnic values of opportunity, hard work, faith in God and family form the very foundation of our communities. Yet we live in a world where these values are threatened -- under attack by criminals that would seek to make our homes, our neighborhoods and our businesses their next victim.

Knowing your concern to see our neighborhoods safe, our streets cleaned of the criminals, and our schools safe for our children, we offer this comparison of the candidates' records on crime-- the BUSH RECORD OF LEADERSHIP AND EXPERIENCE IN LEADING THE FIGHT ON CRIME vs. the Dukakis record of letting convicted criminals, sentenced to life without parole, back out onto our streets. It's one thing to talk tough on crime, and it's another to put policies into action that fight crime and take the criminals off our streets - for good. GEORGE BUSH ACTS, Michael Dukakis talks.

* * * GEORGE BUSH ON CRIME * * *

"Fighting crime must be a high priority for the next four years. Let's close the loopholes that let crooks go free to repeat their offenses. I want to stop hamstringing our police. Let's strengthen the laws to protect the victim, not the criminal."

GEORGE BUSH IS A DOER WHEN IT COMES TO TAKING CRIMINALS OFF OUR STREETS AND KEEPING THEM IN JAIL WHERE THEY BELONG. GEORGE BUSH:

- o supports mandatory prison sentences for individuals convicted of using a firearm during a criminal act
- o supports reinstatement of the federal death penalty
- o has said no to furloughs for killers
- o will appoint judges who will crack down on criminals

THE DUKAKIS SCANDAL ON CRIME

The record of Michael Dukakis on crime is abysmal. While George Bush believes in tougher prison sentences to deter crime and keep criminals in jail, Michael Dukakis is looking for ways of getting the criminals and murderers out. Michael Dukakis' record on crime speaks for itself and it's an awfully frightening one.

We've all heard of the scandal of the Dukakis furlough program, but the bigger scandal is how Dukakis fought attempts to end the

program even after its disastrous consequences became apparent. Here are only some of the frightening facts:

- o during his two terms as Governor, Dukakis approved 3,782 passes for murderers to leave Massachusetts prisons where they had been sentenced to life without parole
- o Dukakis has commuted the sentences of 53 murderers
- o between 1980 and 1987, through the furlough program, an average of 388 furloughs a year were granted to killers
- o the furlough program simply let criminals walk away from prison. Ninety-five percent of escaped prisoners got out by walking away as a result of the furlough program

Dukakis' record is that of a man more concerned with criminal's rights than with victim's rights. Dukakis is only making the job of law enforcement officials tougher. GEORGE BUSH WANTS TO KEEP MURDERERS AND CRIMINALS BEHIND BARS, NOT GIVE THEM A LICENCE TO ROAM FREE.

We have enclosed three informational pieces; a Reader's Digest article on the Dukakis furlough program, "Getting Away With Murder", Dukakis on Furloughs, and Dukakis: Coddler of Criminals. We think you'll agree that while Dukakis talks tough on crime, reality paints quite a different picture.

PLEASE HELP US IN COMMUNICATING THIS INFORMATION TO YOUR FRIENDS, NEIGHBORS, ASSOCIATES, ETC. WE WOULD GREATLY APPRECIATE AND NEED YOUR HELP IN SPREADING GEORGE BUSH'S MESSAGE TO OUR COMMUNITIES.

ORGANIZATIONAL NOTES

Next week we begin a series of weekly columns from Vice President Bush to the nationality communities on shared issues of concern. Please look for these columns in your community newspapers, along with other clippings on the campaign. We would appreciate copies of any articles, letters to the editors, op-eds from these newspapers or reports of media coverage heard around the neighborhood.

Our nationalities radio actualities is also underway, with plans for the Vice President to send personal messages on the issues to our communities over the nationality community radio programs.

We emphasize again that we are committed to organizing the most effective grassroots campaign possible. We look to you to continue to recruit the workers at the local level and will assist you in plugging these workers into the state nationality campaign organizations.

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DUKAKIS: CODDLER OF CRIMINALS

TALKING POINTS

- o Dukakis holds the record for granting commutations to murderers: 37 in his first term alone. Since 1982, he has commuted seven more first degree murder sentences. One murderer shot a man in the head. One stabbed a man to death, and one murdered a store clerk and then killed a prison official during a jail break.
- o He allowed furloughs for murderers sentenced to life without parole until public outrage forced him to relent on that policy.
- o When one of his murderers on furlough stabbed and raped a Maryland couple, Dukakis refused to meet with them. "I don't see any particular value in meeting with people. I'm satisfied we have the kind of furlough policy we should have," he told the Boston Herald on 10/15/87.
- o Dukakis opposes the death penalty in all cases. No one has been executed in Massachusetts since 1947, and Dukakis wants to keep it that way. He is on record as refusing to sign any death warrants even if the legislature approves a death penalty.
- o Dukakis pocket-vetoed a bill on July 24, 1978 that would have given major drug dealers a mandatory 25 years in prison.
- o Dukakis banned mandatory AIDS testing for prisoners.

DUKAKIS ON FURLOUNDS

TALKING POINTS

- o Dukakis has supported the practice of furloughs -- free passes out of jail -- since they started in 1972, even for first degree murderers serving life without parole.
- o He criticized Gov. Frank Sargent, who started furloughs, during Dukakis' 1974 campaign for governor. "The prison system should be less of a 'revolving door' for criminals," Dukakis said. "You have to have a Corrections Department that can make good judgments as to who's eligible for a furlough and who isn't."
- o But Dukakis' tough statements were followed by squishy-soft action as governor. Between 1975 and 1978, he commuted the sentences of 37 murderers, a record for the state.
- o Between 1980 and 1987, an average of 388 furloughs a year were granted to murderers alone, an average of more than one a day.
- o On Christmas Eve, 1987, the state announced that 81 prisoners were either missing from pre-release centers, work-release centers, or never came back from furloughs. 59 of those were convicted of violent crimes, including 25 armed robbers, 11 murderers, and 9 rapists.
- o In 1976, Dukakis vetoed a bill that would have excluded first-degree murderers serving life without parole from the furlough program.

Bush 88 Quayle

Coalition of American Nationalities

733 15th Street, N.W.
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202/642 1988

ISSUES NO. 4

OCTOBER 1, 1988

VICE PRESIDENT GEORGE BUSH continues to take his message of the values of freedom, faith and family to the American people. At last Sunday's debate in North Carolina, George Bush put before the American people the clear choice they face this November -- the Vice President's experience and strong belief in values or the Dukakis liberal left philosophy, which is clearly out of touch with America. Vice President Bush accomplished his objective of smoking out the stealth candidate, forcing him to reveal his liberal agenda.

George Bush will continue to carry and stress his message of values and a strong national defense to Americans of all nationalities in the coming weeks as he begins a special weekly column series. The weekly columns will be directed especially to America's nationality newspapers and their readers.

The Vice President will use the opportunity provided by these columns to speak directly to ethnic Americans and to lay out and define for them the vast differences that exist between him and his opponent. The differences are great -- from maintaining a strong and ready American defense to the importance of values and beliefs in this election year -- each issue puts before the American people a clear cut choice as we move into the 21st century.

To make sure that the Vice President's message on these issues reaches you, your neighbors, and friends please check your community newspapers in the coming weeks for these columns. Please also urge your newspaper to print these columns when they receive them. If you do not find these columns in your newspaper please call the newspaper or the Coalition of American Nationalities at 202/624-8601. If your paper did not receive the Vice President's column, we will work to make sure the columns are forwarded to be placed in future editions.

ORGANIZATIONAL NOTES

The Coalition of American Nationalities and the Bush-Quayle '88 campaign announced this past week the formation of two nationality committees, the Polish Americans for Bush-Quayle '88 and Greek Americans for Bush-Quayle '88.

The Polish American Committee is chaired by Frank Piasecki

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noted industrialist from Haverford, Pennsylvania, with Senator Frank Murkowski serving as Honorary Chair. Stanley J. Glod, Dr. George Lerski and Stephen Markowski serve as the Committee's Vice Chairs.

The Greek American Committee is headed by William Chirgotis of Summit, New Jersey and a former Supreme President of AHEPA. The honorary chairs for the Committee are Congressman Michael Bilirakis (R-FL), Congressman George Gekas (R-PA), Congresswoman Olympia Snowe (R-ME) and William P. Tavoulareas, Retired President and Chief Executive Officer of Mobil Corporation. State Senator Adeline Geo-Karis, Dr. John Skandalakis, Alec P. Courtelis, John Parker, Dr. Theodore Perros, and Mrs. Kris Anne Vogelpohl serve as the Committee's Vice Chairs.

We also include in this week's issues mailing three informational pieces for your review. The first is a statement by the Vice President following his visit last week in Chicago with Janusz Onyszkiewicz, public spokesman for the Polish trade union Solidarity. The second piece is an extrapolation from a recently conducted Washington Post-ABC News poll. The poll highlights the success the Vice President has had in unmasking the liberal agenda of the stealth candidate and in laying out to the American people the stark differences between the candidates.

Electoral College Update

The latest edition of the Capital Hill newspaper Roll Call includes a state-by-state analysis of the electoral college break down by candidate. Important to highlight for the Nationalities Coalition are several key states with large ethnic populations. These states could prove to be the decisive battlegrounds in determining the November election.

States rated as a toss-up for either candidate are California, Illinois, Michigan, and Pennsylvania. Rated as leaning GOP are the states of Ohio and New Jersey. These are all important states for George Bush in November and ones where we need to work in redoubling our efforts in swinging and winning votes for the Bush-Quayle ticket. Your continued efforts are vital to this goal with less than 45 days to election day.

Paid for by Bush-Quayle '88

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George Bush for President

FOR IMMEDIATE RELEASE
WEDNESDAY, September 21, 1988

CONTACT: Alixe Glen
(202) 842-1989

STATEMENT BY THE VICE PRESIDENT

I have just met with Janusz Onyszkiewicz, the public spokesman for Solidarity. Our meeting was a productive one, and I asked him to extend my warmest personal regards to Lech Walesa. This is a man who has played a prominent role in Solidarity's valiant struggle. I first met him last Fall during my trip to Poland when he, Lech Walesa, and other Solidarity leaders met with me to discuss their goals for Poland and her brave people.

Solidarity is a beacon for all peoples in Poland and the rest of the world who are fighting for individual freedom and basic human rights. All Americans must salute Solidarity's continuing effort to begin a national dialogue amongst all Poles.

I look forward to the legalization of Solidarity - the legalization of true freedom of individual and political association in Poland. I applaud the continuing attempts by Polish workers and citizens to achieve greater freedom.

The long and cordial ties between the American and Polish peoples date to the very birth of the United States. Three hundred and fifty years ago, the first Poles arrived in Jamestown. In the American Revolution, Thomas Jefferson called Tadeusz Kosciuszko "the truest son of liberty," and next month we celebrate Pulaski Memorial Day in honor of the Poles who gave their lives in our fight for independence. Millions of Americans of Polish descent draw on the strength and greatness of their national heritage. It is fitting that October is designated Polish-American Heritage Month.

The United States and Poland are thus bound together, not only by ties of blood, but also by our mutual love of liberty and our common dedication to the preservation and advancement of the rights of man.

Relations between the United States and Poland need to be put on a realistic and constructive footing. I hope that the current discussions between the leadership of Solidarity and the Polish Government will prove fruitful in establishing a national dialogue, pluralism, and the right of association.

For my part, I am committed to direct and effective support for the Polish nation within the framework of the historical relations between our peoples. In this determination, I know I have the support and encouragement of all Americans.

#

WASHINGTON POST-ABC NEWS POLL

THE ISSUES

Respondents were asked whether the following issues will be very important, somewhat important, not too important or not important to them in deciding how they will vote. For each one they identified as very important, they were asked this follow-up question: "Is this issue important enough to you that it alone could determine which way you vote this November or could other issues affect your vote, too?"

	ISSUE ALONE VERY IMPORTANT	VERY IMPORTANT WITH OTHER ISSUES	SOMEWHAT IMPORTANT	NOT TOO IMPORTANT	NOT IMPORTANT AT ALL
Folding taxes down	18%	45%	27%	8%	2%
Creating jobs	16	51	26	5	1
Upholding the principle of allegiance	10	35	27	16	11
Preserving the values of the American family	14	53	24	7	2

IDEOLOGY

Q. Are Michael Dukakis' views too liberal for you, too conservative or you, just about right for you or aren't you sure?

	May	Sept.
Too liberal	19%	28%
Too conservative	6	4
Just about right	41	31
Don't know	34	37

Q. Are George Bush's views too liberal for you, too conservative or you, just about right for you or aren't you sure?

	May	Sept.
Too liberal	6%	6%
Too conservative	28	22
Just about right	34	39
Don't know	32	34

FAVORABLE/UNFAVORABLE

Q. I'm going to mention the names of a few public figures. For each, please tell me whether you have a favorable or unfavorable impression of that person or if, perhaps, you don't know enough to say.

■ How about George Bush?

	May	Sept.
Favorable	50%	49%
Unfavorable	37	40
Don't know	13	11

■ How about Michael Dukakis?

	May	Sept.
Favorable	67%	42%
Unfavorable	10	36
Don't know	23	22

PERSONAL CHARACTERISTICS

Now I'd like to read you a few ways people describe presidential candidates. For each description, please tell me whether it applies to the candidates or not:

Q. The statement, "He is a strong leader," applies to:

	BUSH	DUKAKIS
	May	Sept.
	46%	47%
	54%	48%

Q. The statement, "He cares about the concerns of people like you," applies to:

	BUSH	DUKAKIS
	May	Sept.
	50%	55%
	68%	56%



Q. The statement, "He has the right kind of experience to be president," applies to:

	BUSH	DUKAKIS
	May	Sept.
	70%	54%
	53%	60%

Q. The statement, "He can be trusted in a crisis," applies to:

	BUSH	DUKAKIS
	May	Sept.
	54%	51%
	60%	56%

Q. The statement, "He has a vision for the future of the country," applies to:

	BUSH	DUKAKIS
	May	Sept.
	60%	54%
	69%	58%

Q. The statement, "He would get things done," applies to:

	BUSH	DUKAKIS
	May	Sept.
	55%	55%
	64%	58%

Q. The statement, "He is honest," applies to:

	BUSH	DUKAKIS
	May	Sept.
	59%	66%
	72%	65%

TRIAL HEAT

Q. If the 1988 presidential election were being held today and the candidates were George Bush, the Republican, and Michael Dukakis, the Democrat, for whom would you vote?

	May	Sept.
Dukakis	53%	46%
Bush	40	50

NATIONAL PROBLEMS

Q. Now, regardless of how you might vote, I'd like you to compare Dukakis and Bush in some ways. Under which candidate, Dukakis or Bush, do you think you personally would be better off financially?

	May	Sept.
Dukakis	43%	38%
Bush	40	50

Q. Which candidate, Dukakis or Bush, would do better at:

■ Keeping the United States out of war.

	May	Sept.
Dukakis	45%	38%
Bush	35	47

■ Controlling inflation.

	May	Sept.
Dukakis	41%	37%
Bush	45	50

■ Reducing the problem of illegal drugs.

	May	Sept.
Dukakis	41%	40%
Bush	35	44

■ Holding taxes down.

	May	Sept.
Dukakis	39%	31%
Bush	45	55

■ Protecting the Social Security system.

	May	Sept.
Dukakis	53%	48%
Bush	30	38

■ Keeping unemployment down.

	May	Sept.
Dukakis	51%	44%
Bush	35	42

■ Providing leadership for the country.

	May	Sept.
Dukakis	48%	40%
Bush	40	50

■ Reducing the threat of nuclear war.

	May	Sept.
Dukakis	42%	36%
Bush	39	47

■ Reducing the federal budget deficit.

	May	Sept.
Dukakis	47%	44%
Bush	35	41

■ Maintaining high ethical and moral standards in his administration.

	May	Sept.
Dukakis	49%	40%
Bush	32	42

■ Maintaining a strong national defense.

	May	Sept.
Dukakis	28%	23%
Bush	61	66



NOTE: For some questions the percentage with no opinion is not shown. The latest Washington Post-ABC News Poll was based on telephone interviews with 1,509 randomly selected self-described registered voters, 83 percent of whom said they were certain to vote in the November general election and constitute the subsample of likely voters. Interviewing was conducted Sept. 14-19. The results from the survey conducted May 18-26 reflect the responses of 1,172 self-described registered voters. Interviewing for both surveys was conducted by Chilton Research of Radnor, Pa.

Results for the presidential choice question were based on the likely voter subgroups. Other results displayed here are based on the total sample of registered voters.

Figures were adjusted slightly to conform to the latest Census Bureau estimates for the population with regard to age, education, race and gender.

The margin of sampling error for both surveys is plus or minus 3 percentage points for the overall results based on registered and likely voters. Results for subgroups have a larger margin of sampling error. Sampling error is only one of many potential sources of error in this or any other public opinion poll.

GEORGE BUSH ON TRADITIONAL VALUES

VICE PRESIDENT GEORGE BUSH stated in his acceptance speech that this election is "about the beliefs we share, the values we honor, the principles we hold dear." He was absolutely right. From the very beginning of the campaign, George Bush has taken his case of traditional values, faith and family to the American people, offering what has been an extremely effective contrast with the policies espoused by his liberal-left opponent.

George Bush seeks to strengthen the family, while Michael Dukakis and his Democratic counterparts try to supplant it. The George Bush record and agenda is aimed at restoring values to our educational system and our society. George Bush supports:

- o the establishment of high quality child care programs that are built around parental choice, offering families flexibility consistent with their own values and traditions
- o our children having the opportunity to say a voluntary prayer before the beginning of the school day
- o requiring teachers to lead students in a daily recitation of the Pledge of Allegiance
- o programs such as urban and rural homesteading offering low-income Americans a chance at the American dream of owning their own home

But no one needs to look further than the Democratic platform to see exactly what Dukakis and the social liberal theorists are up to. The Stealth candidate thinks that saying the word "values" over and over again can somehow hide his Party's true agenda. They mouth the words of the Pledge of Allegiance and speak of values but in the end you'll be hard-pressed to find the substance. Here's just a sampling of the words not once mentioned in the Democratic platform:

* God	* Prayer	* Church	* Worship
	* Adoption	* Abortion	

And one really begins to understand the hidden policy agenda of the Stealth candidate and the Democratic Party by listening to those within the Party itself. Robert Borosage, formerly Jesse Jackson's issues advisor, explains in a recent interview, "the reason we didn't have a real fight over the platform is that the Dukakis people gave us so much of what we wanted. Seventy percent of the (Democratic) platform is actually from Jackson's

agenda, but you'd never be able to figure that out unless you were an expert." Deception is what the Democrats are trying to practice on the American people, but they aren't buying it.

And why don't we hear Michael Dukakis being questioned on the far left positions he has taken on a number of family values issues:

- * his support for federal funding of abortions
- * his opposition to prayer in schools
- * his support for homosexuals serving as foster parents
- * his support for child-care proposals that would exclude traditional families from benefits

We've also yet to hear from Mr. "Card Carrying Member of the ACLU" whether he subscribes to the radical ACLU agenda of:

- an end of tax exemption for all churches
- permanent bans on displays of the nativity scene
- removal of "under God" from the Pledge of Allegiance
- declaring that gays have a constitutional right to marry

The American people have the right to know.

ORGANIZATIONAL NOTES

The Vice President's message continues to reach the nationality communities. Four Armenian American newspapers, Nor Gyank, Armenian Reporter, California Courier and The Armenian Weekly, carried reports on the "Armenian American Supporters for George Bush" reception at the Republican Convention. Californiai Magyarasag, a Hungarian American paper, carried a reprint of Bush's message for Hungarian Newspaper Day. The Ukrainian Weekly reprinted a statement by the Vice President regarding Black Ribbon Day. We would again like to urge you to please forward to the Coalition copies of any articles, op-eds and letters to the editor that appear in your community newspapers.

The Coalition of American Nationalities and the Bush-Quayle '88 campaign is pleased to announce the formation of the Italian Americans for Bush-Quayle '88 Committee. The Italian American Committee is chaired by Frank Stella, Honorary Chairman of the National Republican Heritage Groups Council. Serving as honorary chairs of the Committee are Senator Alfonse D'Amato (R-NY), Congressman Dean Gallo (R-NJ), Congressman Guy Molinari (R-NY), Congresswoman Marge Roukema (R-NJ), Governor Ed DiPrete of Rhode Island, Former Massachusetts Governor and Former Ambassador to Italy John Volpe and Mayor Michael Traficante of Cranston, Rhode Island. Named as vice chairs to the Italian American Committee were S. Joseph Avara, National President of the Order Sons of Italy of America, and Joseph Zappala of St. Petersburg, Florida.

Included with this week's issue is an article on the "Massachusetts Mirage", proving that those who know Michael Dukakis best, like him the least. An op-ed piece from the New York Times highlights the Dukakis Dilemma of trying to appear mainstream while hiding his anti-defense views. Finally, we enclose a fact sheet: George Bush on Security for Older Americans.

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Sun Chronicle, Attleboro, MA, September 22, 1988

Let's look at what Dukakis has done for Massachusetts

"I will do for America what I've done for Massachusetts"

— Michael Dukakis

Just what has Michael Dukakis "done for Massachusetts?"

Let's conduct an autopsy on his performance record and take a hard look at the facts that lie beneath the epidermis of campaign rhetoric.

• In his first term as governor, Dukakis broke his campaign promise not to raise taxes.

"I will guarantee there will be no new taxes next year (1975) if I am elected."

Just months after being elected, he proposed and then signed into law, the largest tax increase in the history of the Commonwealth.

• In just four years, Massachusetts increased state tax revenue per person by 47 percent, a faster rate of increase than in 49 other states.

• While Dukakis was raising taxes on both large corporations and small business, manufacturing and industrial jobs have been leaving Massachusetts in record numbers. More than 100,000 manufacturing jobs have been lost in this Commonwealth over the last four years.

Massachusetts, with just 3.1 percent of the nation's industrial employment, lost over 40 percent of all manufacturing jobs lost in the country.

• In one year's time Dukakis turned a \$500 million surplus into a \$500 million deficit.

• In just four years Dukakis added more than 10,000 new state employees at a cost of almost \$2.2 billion.

• Long-term total debt (which is borrowing money to pay for large projects) has doubled from \$6.2 billion to \$12 billion since 1982. Interest on these loans amount to \$1 billion a year.

• \$91 million worth of lottery funds slated to go to cities and towns was grabbed by Dukakis to help erase the state budget deficit. This year, the loss for Attleboro is \$25,000.

LESTER GRAY

• A Dukakis program to help minorities find executive jobs spent \$115,000 in 10 months — yet, it placed only five people in new positions.

• The Dukakis Administration hired some 13,000 so-called consultants. Last year, the state auditor uncovered a scandal involving these "consultants."

One example: Two electricians who were hired as "consultants," their duties consisting of changing light bulbs and plugging in electrical appliances, received an annual salary of \$70,200 each.

• The annual cost of Dukakis' Employment and Training Program (ET) has risen to more than \$50 million — up from only \$7 million required for the previous administration's more successful Work and Training Program (WTP). Yet the welfare caseload has remained virtually unchanged.

• Among the 11 industrial states, Massachusetts' employment growth rate has dropped from second to tenth.

• On an annual basis, taxes in Massachusetts has grown three times as fast as federal taxes.

• "I don't believe in people owning guns, only police and military. I am going to do everything I can to disarm this state." (Michael Dukakis, June 16, 1986).

• Since 1985, Massachusetts prisoner-release programs, including furloughs, have accounted for the escape of 264 first-degree and second-degree murderers. And 94 of those vicious killers are at large today.

• Michael Dukakis has been a strong backer of "convenience" abortion since he was a state legislator, even before abortion was legalized in 1973 by the Supreme Court in the *Roe v. Wade* case.

• Dukakis was a venement opponent of Proposi-

tion 2W, the property tax cap which he termed "too simplistic" for the smart voters of Massachusetts. When the voters finally gave Prop 2W overwhelming support and voted it in place, they added over \$90 billion in real growth to the property base. The insolent Dukakis, who so vigorously opposed Prop 2W, has now taken credit for this on his campaign trail.

• In 1975, under Dukakis, a homeowner was duty-bound by law to flee an intruder.

• In 1985 through 1986, Dukakis strongly opposed repeal of the 7 1/2 percent income surtax. Angry citizens gathered 137,000 signatures to put the issue on the ballot. It was repealed.

• 145,000 families in Massachusetts with incomes below the poverty line are seeing 16.3 percent of their income consumed by taxes. The burden arises not from income taxes, which few poor people pay anymore, but from local property taxes and state sales and excise taxes.

• Boston Harbor, the most polluted harbor in the United States, has forced the federal government to sue Massachusetts for its clean-up — which has caused an increase in water and sewerage rates of 400 percent for years to come.

• Massachusetts now has the nation's highest housing costs.

• Car insurance in Massachusetts is more expensive than in 46 other states.

• Gerald Indelicato, Governor Dukakis' former education adviser (and the man he swore in as president of Bridgewater State College) pleaded guilty to mail fraud, tax evasion, swindling \$50,000 in state funds and kickbacks.

• Robert Cunningham, Dukakis' former deputy public safety secretary, was forced to resign after his ties with organized crime became public.

• Nelson Barner, Dukakis' pick to head the MDC police, is now in jail after being convicted on police exam-scam charges.

• Massachusetts has the distinction of having the nation's highest heating costs.

• Dukakis opposes the death penalty.

• Massachusetts has the distinction of being the only state to force its legislators to vote in for themselves "emergency" pay raises.

• Massachusetts ranks number one in the nation for auto theft.

• In 1986, a mandatory seat-belt law was proposed. Despite strong opposition from the public, Dukakis signed it into law. Over \$600,000 were spent in the media to persuade voters not to repeal it. The voters rejected mandatory seat belts soundly.

• 40 percent of Massachusetts voters favor capital punishment for cop killers. In 1983, Dukakis made a recommendation to commute the life sentence of a man convicted of first-degree murder in the 1969 killing of a police officer.

• During Dukakis' second term, furloughs for convicted rapists increased 47 percent, and there was a 103 percent increase in unsupervised furloughs for convicted drug dealers.

• Less than 1 percent of the gun-carrying criminals charged under the Bartley-Fox Gun Law (mandatory one year in jail) ever serve a day in jail.

• John Sasso, Dukakis' original campaign manager, resigned after admitting to campaign "dirty tricks" against Joe Biden. Sasso left the campaign with a healthy severance payment, went to work for a public relations firm which handles the state lottery contract and is now back on the campaign team.

• Dukakis claims he "didn't know" that his million-dollar family trust had heavy investments in South Africa — after he divested Massachusetts investments there.

• Etc., etc.

This guest columnist lives in Attleboro.

Governor Dukakis Is Toying With Defense, and America

By Midge Decter

Anyone of voting age knows enough about the world to take for granted that when he listens to campaign oratory what he will get is a characteristically and intentionally debased form of discourse. Thus, the Presidential debate should not in any way have disappointed normal expectations.

But when it comes to the issue of defense policy and United States-Soviet relations, even by the special standards of campaigning Gov. Michael S. Dukakis has been giving distinguishedness a whole new dimension. He is trying simultaneously to soar with the hawks and feed with the doves. The irony is that he must endure the results obtained by Ronald Reagan while disavowing the means that were necessary to achieve them.

It is no secret that Governor Dukakis long numbered himself among the ardent opponents of nuclear weapons. If that in any way qualifies as an actual position rather than a mere posture, he has indeed a position.

Back in the days when there was an active movement for a nuclear freeze — the days, remember, when the United States was threatening, or promising, to deploy intermediate-range missiles in Western Europe to offset the already-deployed Soviet SS-20's, while the Soviets on their side were engaged in a massive effort to keep this from happening — Governor Dukakis was a member of that movement in good standing.

Currently, it is not unfair to say, he teeters back and forth very close to the edge of outright unilateralism, offering an occasional gracious nod to the Stealth bomber, say, but steadily opposed to all or any of the weapons systems that have been declared necessary to a modernized nuclear deterrent: that is, the MX, the Midgeman, and last but far from least in the litany of what he is against, the Strategic Defense Initiative. S.D.I., he insists, will, among other disasters, sink our already overburdened economy. His own defense policy is to

strengthen what he deems to be our shamefully neglected conventional forces.

But the members of the peace movement who have all these years been advocating such a policy, and most especially Michael Dukakis, are now in something of a pickle. Having declared that the arms race in and of itself would inevitably end in nuclear war, they are now confronted with the achievement of Ronald Reagan, "warmonger" par excellence, who has succeeded in getting Mikhail S. Gorbachev to agree in principle to a mutual reduction of nuclear arsenals.

One need not share President Reagan's faith that arms reduction by itself will contribute to our security — many of us, in fact, do not — to recog-

He tries
to both soar
like a hawk
and feed
with the
doves.

nize that Moscow's concessions could only have resulted from Soviet worry about the renewal of American military strength: the renewal, need it be pointed out, that the Reagan Administration undertook and that Michael Dukakis opposed.

Though Governor Dukakis has in recent weeks taken Mr. Reagan to task for having left the initiative in Mr. Gorbachev's hands, surely a man intelligent enough to have got himself nominated for the Presidency knows in his heart what did in the end actually bring the Soviets to the point of serious negotiation.

There is no way he cannot know that it was the upgrading of our nuclear weaponry, the deployment of intermediate-range missiles and the decision to launch the S.D.I. No doubt there are peace-movement true believers who, in loyalty to their old-

time religion, refuse to acknowledge the proof of Ronald Reagan's nuclear piddling; but unlike Michael Dukakis, they are not engaged in asking the American people to hand over to them personal responsibility for the nation's destiny.

Mr. Dukakis would clearly prefer that his audiences quickly skip over the question of just how the country happened to get where it presently is vis-à-vis the Soviets and move on to other things. During the debate, for instance, he observed that for 40 years we have regarded the Soviets as enemies and now President Reagan has signed two arms control treaties with them — following which, without even a hint of what might have connected these phenomena in his mind, he turned on George Bush and demanded to know what he intended to do now about the Soviet need for economic help.

Leaving aside the almost comically inappropriate tone of triumph in which Mr. Dukakis issued this challenge, as if it were George Bush and not he who had been caught out in a contradiction, one can hardly blame him for his haste. Given the chance to think it over, people might have been reminded that had his own views on defense policy prevailed, the Soviets, far from finding it advisable to reach agreements with us, would have had a hard time deciding whether to laugh with relief at their luck or with contempt for America's incapacity to grasp the real properties and uses of power.

Of course, Mr. Dukakis could do what some people do when they have learned better about some formerly cherished opinion: say so and move on. But for some reason, candidates for high office do not seem to find this a possible option.

So it appears that Michael Dukakis will go on until Nov. 8, on the one hand unable, lest it cost him the election, to be the full-throated disclaimer his true constituents want him to be, and on the other hand hemmed in and disarmed himself by the need to pretend that he means to beat Ronald Reagan and George Bush at their own game.

The truth is, however, that this is a game his ideas would disqualify him even from playing, let alone winning.

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Midge Decter is executive director of the Committee for the Free World.

9/22/88

GEORGE BUSH ON SECURITY FOR OLDER AMERICANS FACT SHEET

The Reagan-Bush Administration entered office in 1981 pledging to restore the financial integrity of Social Security, and to pursue programs and policies that would allow the nation's elderly to live independent lives with dignity and well-being.

Those promises were kept.

This Administration forged a bipartisan effort to rescue Social Security. As a result, benefits are up substantially, and the Social Security Trust Fund stability is assured well into the next century. The crippling, double-digit inflation of the Carter years -- over 13 percent in 1980 -- has been sharply reduced, thus ending the devastation inflicted on elderly Americans living on fixed incomes. Sustained economic growth with low inflation has brought the poverty rate among the elderly to an all-time low, below that of the American population as a whole.

George Bush has pledged to not let them take it away.

GEORGE BUSH: A RECORD OF CONCERN AND ACTION

George Bush, has a record of action dating back to his days as a Congressman -- sponsoring legislation in 1969, for example, to increase social security benefits by 10 percent across-the-board, to index benefits against inflation, and to increase benefits for the children of disabled or deceased workers, and for their widows and parents.

In areas of health concern to older Americans, Congressman George Bush:

- o Voted to extend and improve health programs relating to diseases of the aging, including heart disease, cancer, stroke, and other major diseases and conditions;
- o Sponsored legislation to attract medical practitioners to areas where their services are scarce;
- o Co-sponsored an amendment to Medicare to extend eligibility for 24-hour nursing services to hospitals not formerly qualifying

And, George Bush, in addition to calling for tough economic policies to break the back of inflation, and for an end to partisanship on Social Security, as early as 1980:

- o Supported the development of effective Health Maintenance Organizations (HMOs); and,

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- o Called for coverage of the costs of serious, acute illness, saying:

"...this nation and its citizens must have a program to cover the catastrophic medical expenses for everyone unable to handle them."

George Bush has a record of service, experience, and accomplishment that will work for America's older citizens.

THE FUTURE

Thirty-two million Americans are over the age of sixty-five. Their life expectancy has increased dramatically in this century, and now, they are the fastest growing segment of our population.

America is proud of -- and indebted to -- its older citizens, and George Bush is committed to safeguarding their interests.

Our nation's older citizens represent not only a link to our past -- but a bridge to the future in the depth of their experience and in their adherence to a longstanding set of values reflecting the best of the American tradition.

George Bush pledges that those who brought America so far in their working years will remain secure in their retirement, and that a Bush Administration will work to see that older Americans can have:

- o Income security -- through a commitment to a sound Social Security system, to pension soundness, and in the knowledge that their income will not be eaten away by inflation.
- o Health security -- through a commitment to a strong Medicare system, and to access to quality health care.
- o Long Term Care Security -- secure that there are fiscally responsible plans to meet their long term care needs.

"I pledge to continue the economic policies which have brought low inflation, low taxes, and low interest rates."

KEEPING INFLATION IN CHECK

George Bush will fight to protect the income security of America's older citizens, by working to maintain and build on the economic gains of the last seven years.

The most important of these gains was to break the back of inflation -- the silent tax that erodes the incomes of all living on fixed pensions. America cannot afford to return to the crippling, double-digit inflation of the Carter years:

- o Inflation, which would have doubled the price of goods and services in five years, was cut from a peak of 13.5 percent in 1980 to an average of 3.3 percent per year from 1982 to 1987; and,
- o Interest rates, measured by the prime rate, slashed from a high of 21.5 percent in 1980 to 8.5 percent in 1988.
- o And, the poverty rate for older Americans stood at an all time low of 12.2 percent in 1987 (2.1 percent if all government assistance is counted) -- a 20 percent drop from the 15.3 percent level reached by 1981 -- due largely to breaking the back of inflation, and in part due to the improvements in Social Security policies.

George Bush knows what it means to deliver.

PRESERVING THE SOCIAL SECURITY TRUST FUND

"We need to ensure that current beneficiaries receive the benefits to which they are entitled and that today's workers have confidence that there will be a solvent Social Security system when they retire."

George Bush is committed to maintaining the integrity of the Social Security system. He has pledged to protect the gains made possible by the President's bipartisan commission, and enacted into law in 1983:

- o The Social Security Trust Funds -- on the brink of insolvency in 1980, despite huge payroll tax increases and benefit cuts enacted in 1977 -- has been returned to solvency through bipartisan action.
- The Old Age Survivors Disability Income (OASDI) fund is now financially strong with over \$100 billion in reserves by the end of this fiscal year.
- o Average monthly Social Security benefit has increased from \$294 for a single retiree in 1980 to \$513 in 1988.

George Bush has demanded Social Security not be treated as a partisan issue. And, he has said that Social Security is off-limits from budget cuts, and he opposes means-tests -- it's an earned benefit and should be treated as such.

"We should exempt Social Security from budget cuts, and avoid means-testing it."

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PROTECTING THE PRIVATE PENSION

"Adding to the income security of future retirees -- through private pension plans -- will help fulfill our common goal of ensuring that all senior Americans are well off."

George Bush believes that the pension funds of America's working men and women should be safe from mismanagement and political assault:

- o Some have wrongly proposed that America's pension funds should be used as the financing vehicle for the social welfare plans of the liberal left:

"...We believe that it is time to invest...in new priorities...through...[a] program to invest a portion of public and private pension funds as a steady source of investment capital..."

Democratic Platform (1988)

George Bush will oppose this assault on the pension funds of the American worker -- public and private pension funds alike. And, he opposes the use of public pension funds -- as was done so recently in Massachusetts -- to provide artificial balance in public budgets. A pension fund raid is irresponsible and hurts most those who have earned the benefits -- the elderly.

A Bush Administration will:

- o Encourage greater accumulation of pension funds, and work to see that they cover a broader cross-section of our workers.
- o Examine tax incentives that will encourage small businesses to provide pension coverage.
- o Work with the Congress, and through Executive action, to bring greater simplicity and stability to the pension laws -- and to reduce the regulatory burdens -- to make pensions more attractive to private employers.

And, George Bush believes that pension funds should be invested to benefit workers, not to advance political causes.

QUALITY HEALTH CARE SECURITY

George Bush has long felt the need for a health system that delivers:

"We need to promote better management of our health care system so that our resources are used more efficiently and so that health costs do not erode our capacity to provide for other human needs." (1980)

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Bush 88 Quayle

Coalition of American Nationalities

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ISSUES NO. 6

OCTOBER 17, 1988

VICE PRESIDENT GEORGE BUSH stepped up campaigning among ethnic Americans this week, traveling to Cicero, Illinois to attend the annual Houby Day Parade on October 9th and then to Chambersburg, New Jersey where he toured an Italian bakery and played billiards at a local pool hall. The Vice President's message, with his emphasis on traditional values, family and a strong American defense -- the language of ethnic America -- is proving to be the winning message.

WITH ONLY 22 DAYS REMAINING UNTIL ELECTION DAY YOUR HARD WORK IN CARRYING THE BUSH MESSAGE TO YOUR COMMUNITIES CAN CONTINUE TO MAKE THE DIFFERENCE IN SECURING A BUSH VICTORY ON NOVEMBER 8TH.
BUT THIS IS NOT THE TIME FOR US TO LET UP.

* * * *

NATIVE LANGUAGE PHONE BANK

Important to a Bush victory is making sure that those who support the Vice President go to the polls on election day and VOTE. Several members of our nationality network across the country have been active in securing votes for George Bush, working through what they have described as a NATIVE LANGUAGE PHONE BANK. Their efforts and the positive results they have achieved is important enough that we wish to share it with you and urge you to undertake similar efforts in your own community. This is a no-cost, effective program that needs only your initiative and time.

The program is simple. All that is required is to:

- * Contact voters in your community
- * Convey to them the message of the Vice President
- * Ask them to urge their neighbors to vote for George Bush
- * Stress the importance to get out on election day and vote.

The effectiveness of this effort, as we have been told, comes from speaking to these voters in their native tongue. Many of these individuals have never been asked by any candidate or representative of the candidate for their support. Your call lets them know that their vote in this election is important and they can make a difference. It also highlights that George Bush shares their concerns, stands with them on the issues and needs their support on election day. The results from these calls, as we have said, is very positive. In an election that looks to be extremely close, George Bush needs every vote we can muster for

him and this can prove to be an effective tool in achieving that goal. You may wish to speak with your local Bush-Quayle '88 office for assistance in implementing this program.

ORGANIZATIONAL NOTES

FOR THOSE OF YOU WHO MAY BE JUST BEGINNING TO RECEIVE OUR WEEKLY ISSUE MAILINGS, WE ASK FOR YOUR ASSISTANCE IN CIRCULATING THIS INFORMATION AMONG YOUR FRIENDS, NEIGHBORS AND OTHERS IN YOUR COMMUNITY. WITH ONLY THREE WEEKS REMAINING UNTIL ELECTION DAY IT IS EXTREMELY IMPORTANT THAT WE CONTINUE OUR EFFORTS TO MAKE THE BUSH MESSAGE HEARD. YOUR WORK IS INDISPENSIBLE TO THIS EFFORT.

Vice President Bush brings his message directly to the nationality newspaper in a series of weekly columns that begins this week. The first two columns, "Anniversary of Evil -- Reminder of Freedom's Price" and "Our Values Make America Great" again stress the Vice President's message on the need for a strong America and the importance of values in this election. We hope that you look for these columns in your community newspapers and would appreciate forwarding copies if they do appear.

Included with this week's issue is an article on the Vice President's trip to Cicero, Illinois for the Houby Day Parade along with a report on the favorable reactions among key ethnic voters in Ohio to George Bush. Also included is an article on George Bush Jr.'s appearance at a \$10-a-plate spaghetti supper at the Three Saints Russian Orthodox Church in Garfield, New Jersey.

Another report highlights again how those who know Michael Dukakis the best, like him the least -- describing how the candidate broke a campaign promise to preserve a historic farm. An example of Dukakis' attempt to subvert the power of the executive is evident in his suit against the federal government over the assignment of Massachusetts National Guard troops to Central America. Not satisfied with a lower court's dismissal of his complaint, Dukakis continues to press his case. Finally, one man's view on just how far out of touch with the nation Michael Dukakis really is and why he just doesn't understand America.

The Coalition of American Nationalities is pleased to announce the formation of the Armenian Americans for Bush-Quayle '88 Committee. The Armenian American Committee is chaired by Barry Zorthian, a former foreign service officer and Vice President of Time, Inc. Serving as honorary chairs are Governor George Deukmejian of California and Congressman Charles "Chip" Pashayan, Jr. (R-CA). The Committee is also made up of forty-seven vice-chairs, representing fourteen states and the District of Columbia as well as wide range of the Armenian American political and community leadership.



Bush Joins Parade In the Chicago Area To Woo Ethnic Vote

Special to The New York Times

CICERO, Ill., Oct. 9 — Vice President Bush today pledged to "never forget" the lack of freedom in Eastern Europe as he continued his effort to attract ethnic voters.

Mr. Bush, campaigning like a local politician seeking local office, joined in the annual Houby Day Parade that went through Cicero and Berwyn, two suburban Chicago communities with large immigrant populations from Eastern Europe.

The event marked the start of what might be a critical week for the Republican Presidential nominee with the scheduled debate with Michael S. Dukakis this week. Before leaving Washington early today, Mr. Bush began his formal preparation for the second meeting between the Presidential candidates.

The Vice President made no mention of his running mate, Senator Dan

Quayle of Indiana, who received an impassioned defense from Mr. Bush on Saturday. At one point today, asked where "Quayle" was, Mr. Bush simply looked upward and stretched his arms above his head.

Because Illinois is viewed as a toss-up state that is too close to call, support from ethnic voters is regarded by Mr. Bush's aides as important to his chances of carrying the state.

In brief remarks before the parade Mr. Bush said: "None of us will ever forget that there is not freedom in Eastern Europe. I am — pledge, if I become president, I will never forget that."

The campaign sought to project an upbeat mood. Mr. Bush rode in a red fire engine and waved energetically at thousands of onlookers along the mile-long route of the parade for Houby Day, an event that began as a Czech celebration of the mushroom harvest.

Mr. Bush was accompanied by his wife, Barbara, and Gov. James R. Thompson.

Taking on the role of cheer leader Mr. Thompson told the crowd: "Chicago Bears to the Super Bowl, George Bush to the White House."

The Washington Times, October 12, 1988

Ohio blue-collar vote still leaning to GOP

By Donald Lambro
THE WASHINGTON TIMES

EUCLID, OHIO — The men having beer and pastrami sandwiches at the Lithuanian Community Center in this heavily Democratic Cleveland suburb say two factors have shaped their votes for president: experience and how the candidates look.

For these ethnic, working class voters in suburban Cleveland — many of whom still call themselves Democrats but who haven't voted that way since the 1960s — Vice President George Bush fits their image of what a president should look like. His Democratic rival, Massachusetts Gov. Michael Dukakis, doesn't.

"I'm a Democrat but I'll vote Republican," said Jonas Citulus, a retired factory worker who still speaks in a thick Lithuanian accent. He jokingly points to the bottle of Bush beer in front of him to indicate his

choice for president.

"Bush has more experience, and I just like him. He looks like a president," said Mr. Citulus, 74, who added that national defense was also important to him. "America should be [militarily] strong," he said. "I don't think Dukakis will keep us strong."

Seated next to him at the bar was Joe Kijanskas, a burly, 60-year-old construction supervisor, who said "I used to be a Democrat. I voted for [John F.] Kennedy, but I'm for Bush."

"Bush is a statesman, he has experience. Dukakis doesn't look like a president," he said. As far as he's concerned "the country is better off" after eight years of Ronald Reagan.

"If Dukakis wins, we are going down the drain," said Mr. Kijanskas. "The unions are telling me to vote Democrat. But we've got to compete in the world. The Republicans brought this country back."

Ray Butkus, 47, who also works in the construction business, agreed.



He, too, singles out Bush's experience. But, like the others, Mr. Butkus said the economy was also a key factor for him.

"Bush will continue to improve on what's been happening in the economy," he said. "I don't see Dukakis improving the economy for the better."

Ohio is a pivotal midwestern state for both candidates, not only because it casts 23 electoral votes, but also because it is considered a key barometer state that politically mirrors much of the nation.

Only two Democrats have carried Ohio since Harry Truman's 1948 victory — Lyndon Johnson in 1964 and Jimmy Carter in 1976.

Democrats have not won many presidential races here because of the state's huge independent vote, much of which swings to the Repub-

see OHIO, page A10

OHIO

From page A1

licans, and the more rural and conservative electorate in the state's central and southern regions.

Yet it is here in populous Cuyahoga County that the state can be won if Democrats are able to deliver more than 60 percent of the vote to Mr. Dukakis to counter the down-state Republican turnout.

Ronald Reagan carried the state in 1984 by winning 43.7 percent of Cuyahoga County's vote, just as he did in 1980 when he won 41.5 percent of the county's vote.

"Our own polls project Bush at 41.2 percent in the county," said county GOP chairman Bob Hughes. A string of Ohio newspaper poll shows Mr. Bush ahead statewide, with the most recent Columbus Dis-

patch poll showing Mr. Bush leading by 47 to 43 percent.

Interviews with working class voters in places such as Euclid, Parma and Garfield Heights suggest that while Mr. Dukakis may win a clear majority of rank-and-file Democrats, Mr. Bush appears to be winning enough swing Democrats to keep this state in the GOP column.

A typical Bush Democrat is Milka Jeram, a robust-looking, 60-year-old Yugoslavian-American who immigrated here 21 years ago and became a skilled machine operator for General Electric.

"I'm Democrat but will vote for Bush," she said, still exhibiting some difficulty with the English language. "Dukakis? He don't talk like president. He's not have personality like president. For me, Bush is a gentleman," she said.

While Mr. Dukakis has raised homelessness as an issue, she thinks

many of the "street people are lazy people. I came here without one penny and I worked, pushed broom, two jobs. Now I have good job."

Mrs. Denise Nosse, a 36-year-old mother of three young children, said she was backing Mr. Bush "because he's pro-life" on the abortion issue and "is strong on defense. He'll keep us out of war."

Though she came from a family of Democrats, she switched in 1980 to vote for Mr. Reagan.

But Mr. Dukakis is holding on to some faithful Democrats here.

One of them is Frank Mohoric, a 75-year-old retired meat manager for A&P and a Democrat who voted for Mr. Reagan "both times, but I think we need a change."

"I like Dukakis," he said, adding that he did not think Mr. Bush's running mate, Indiana Sen. Dan Quayle, is qualified to be president in the

event he should have to take over. "That's very important to me," he said.

Mr. Dukakis also has his supporters in Garfield Heights and Parma to the south of Cleveland, where small, well-kept bungalows sit side by side behind tiny, manicured front yards.

They are people like John Kralick, a 62-year-old bookkeeper who was forced to take early retirement because of throat cancer.

Mr. Kralick, who calls Mr. Quayle "a draft dodger" and blames the administration for what he says were cuts in his service-connected veterans pension, says he'll vote for Dukakis.

Peeling off a litany of complaints, including closed steel plants, the Iran-Contra scandal, and "too many minimum wage jobs," he says that "Bush is no better than Reagan."

'GOD-FEARING MAN'

Bush son extols dad at Garfield dinner

By PATRICIA CAPPON

George Bush Jr., the vice president's eldest son, called on Republicans yesterday to spread the word that his father is a "God-fearing man" devoted to family and country.

"Our economy is strong; what he's not going to do is take money out of the pockets of working men and women," Bush said, referring to his father's pledge of no new taxes, before some 250 Republicans during a spaghetti supper at the Three Saints Russian Orthodox Church in Garfield.

"Why change philosophies while we have jobs growing and peace in the world?" he asked.

As strolling musicians played music from the movie 'The Godfather,' Bush mingled with those who had each paid \$10 for dinner.

He described his father as a steady leader who would maintain "peace and prosperity" for the nation.

Bush said it was important for people to understand the differences "in mentality" between his father and his Democratic opponent, Massachusetts Gov. Michael Dukakis.

Although Bush the candidate seemed to have abandoned the Pledge of Allegiance issue in recent campaign appearances, his son raised it with gusto last evening.

Some people, particularly those in the media, may be tired of hearing about the issue, he said. "Too bad. My dad doesn't understand the type of mentality that would veto a bill that would allow schoolchildren in Massachusetts to say a pledge... with the word God in it."

Bush exhorted the crowd to climb into the trenches and carry on a grass-roots campaign, manning phones and going door to door to win the state for the Republicans.

"When he's your president, the example he sets for future generations will be one that will make you proud," he said.

The message seemed to register with the crowd.

"We love Mr. Bush" said 79-year-old Louise Otter between mouthfuls of spaghetti. "I think he's going to be pretty good if he does what he says he's going to do."

John Renna, chairman of Italian-Americans for Bush in New Jersey and the Essex County Republican chairman, said the \$10-a-plate dinner was intended to "show that we are not the party of the rich as the Democrats are fond of saying."

Earlier in the day in Trenton, Bush told reporters that Sunday night's debate with Dukakis had illuminated "the human side of George Bush."

"I thought my dad was good," he said.

He said Dukakis "came out real hard. He did what he had to do." But he said he thought his father handled the pressure.

Bush's son conceded that Dukakis had a better presentation. "People have to understand it was just a reminder that not all is pure and perfect."

He said, "I think it helped dad. One thing we had to do was defog Mr. Dukakis."

Bush stressed, "I really believe the election will be decided on peace and prosperity."

The issues that count, he said, are jobs and a strong national defense.

The candidate's son also responded to questions about his father's choice of Indiana Sen. Dan Quayle as a running mate.

"I see the decision reaching into my generation," he said. "Quayle will be a real plus. It (the selection) shows courage."

New Jersey is one of six states considered crucial by Republicans and Democrats in the Nov. 8 presidential election.

"We're going to spend a lot of time and money, and we are going to win the state," Bush said.

Bush, 42, lives in Washington and works full time on the campaign. He is a Yale University alumnus. He also has a master's degree in business administration from Harvard University and ran unsuccessfully for Congress in Texas in 1978.

JACK ANDERSON and DALE VAN ATTA

3 Say Dukakis Waffled on Saving Farm

BOSTON

Gov. Michael S. Dukakis has styled himself as a man of integrity, full of political courage and a committed environmentalist. But there are three men in Massachusetts, all former Dukakis boosters, who say he is none of the above.

The men are former Boston Celtics star Dave Cowens, journalist Harvey Robbins and college professor Robert L. Keighton. They spearheaded a seven-year battle to save a historic farm in Massachusetts.

The trio told us they saw the real Dukakis reveal himself as a man who abused their friendship, betrayed their cause and broke every promise he made to them.

At issue was the historic 55-acre Prowse Farm near Boston. It was from the Doty Tavern on this spot that Paul Revere took the famed Suffolk Resolves to the First Continental Congress in Philadelphia.

Martha Peabody Prowse acquired the farm in the 1920s but left no provision for its preservation after her death in 1975. Cowens, Robbins and Keighton formed Friends of the Prowse Farm in 1976 and began working to block any development.

In 1977, Codex Corp. bought the farm to be the site of its world headquarters.

In his bid for a second term as governor in 1978, Dukakis suffered a humiliating defeat to Democrat Ed King. When Dukakis ran again four years later, he asked the Friends of Prowse Farm for help. In return he pledged to preserve the farm.

Robbins said he began to smell a rat when

Dukakis called him in late August 1980 asking him not to mail letters saying that he supported Prowse Farm preservation. "I thought we were going to try to keep the controversy out of the public domain," Dukakis said.

"I don't want to start an uproar on this baby," Robbins recalls Dukakis saying. "There's no reason in the world why you can't make it clear to all the folks you've been working with that they've got a friend in Dukakis, but I don't want any letters out there."

Dukakis won the election, and the Prowse Farm activists asked him to make good on his pledge. But now he asked the Prowse Farm activists to do the state's work, find the legal authority for the state to take the farm through a lawsuit.

A year went by, the Prowse Farm activists were broke and getting nowhere and Codex started building a steel structure on the farm. Cowens met with the governor and said Dukakis told him, "I promise I'll take the farm if I have the authority—steel or no steel."

Cowens says, "I'll tell you one thing. Mike Dukakis wasn't the man I thought he was when I endorsed him for governor. He was either incompetent, cold and calculating, deceptive or a coward . . ."

When the Supreme Court of Massachusetts sided with the Prowse Farm activists in 1984 and declared the state had the right to take the farm by eminent domain, Dukakis told the group he would have to think about it. Dukakis never ordered the state to take the farm, and Codex built its headquarters.

New York Daily News, October 10, 1988

The Duke and the Guard

Mike Dukakis sued the U.S. Now he's getting his day in court—and he deserves to be tossed out on his ear.

Dukakis, who is vocally opposed to the Reagan administration's Central American policy, didn't like it when the feds ordered 13 public relations specialists from the Massachusetts National Guard to train in Honduras and Panama earlier this year. So what did he do about it? He brought suit against the federal government, arguing that a governor has the right to pick and choose training assignments for his state's National Guardsmen.

John Bolton, head of the U.S. Justice Department's civil division, minced no words in a federal appeals court hearing on Tuesday. He told a three-judge panel that Gov. Dukakis' position was a "dagger aimed at the heart of national defense."

Right. The National Guard is not a political football designed to be tossed around for partisan purposes. It is an essential arm of this country's defense. Its troops are sworn to federal duty—not just state duty. To give each individual governor veto power over its training assignments is an engraved invitation to utter chaos.

Dukakis lost in the lower court. He deserves to lose his appeal. It was utterly wrongheaded to bring the case to court in the first place.

Paid for by Bush-Quayle '88

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PRUDEN ON
POLITICSBy
Wesley Prudden

An alien candidate in a hostile land

The 1988 presidential campaign is a wonderful late education for Michael Dukakis, but the Democratic Party is stuck with paying the tuition.

The Duke is a smart little fellow, after all, and if he puts his mind to it he might make the education pay, later and in private.

So can the party. Some people believe that a succession of sad sacks, beginning with George McGovern and running through Jimmy Carter and Fritz Mondale to the little Duke, could be regarded by the party — with considerable profit — as a succession of laxatives. Sooner or later the last of the the poison will be expelled.

So far the little Duke himself ain't learned much.

He's enraged that nearly everyone is outraged that he furloughed Willie Horton, one of the most accomplished rapists in the Massachusetts prisons. He can't understand why the Maryland woman whom Horton brutalized, and the fiance he stabbed 22 times and left tied up in the basement to listen to the sounds of his fiance suffering at the hands of a human animal, won't shut up about it.

It's a measure of the little Duke's self-centered isolation from the usual human emotions that he imagines that he, not the Maryland couple brutalized by Horton, is the rapist's true "victim".

"You don't think I'm going to let Bush get away with this, do you?" he demands. "I think to play politics with a human tragedy like this is just disgraceful." He calls the vice president's citing of the Horton episode as "totally cynical."

Then the little Duke talks about the "crime" in his own family — the death of his brother, killed by a hit-and-run driver. "I don't need any lectures from Mr. Bush on crime-fighting or on sensitivity or compassion we must extend to the victims of crime."

There's no doubt that the governor suffered when his brother was killed, and again when he lost his

second race for governor. Kitty Dukakis recalled to the little Duke's biographers that he became so obsessed with the loss that she was afraid he was going around the bend. Any one who has lost a brother, a sister or a parent can understand. (Not everyone who has lost a race for public office will necessarily understand how the Duke could equate the loss of a brother and the loss of a job.)

Furloughed

But what a lot of people can't understand is how the governor never understood the pain of the Willie Horton's real victims. He has yet to apologize, or to say anything to suggest that he understands why an apology, or at least a word of consolation, would be appreciated.

The little Duke's problem is that he lives in one country and he's running for office in another. The experiences the rest of us learn by have no relevance in the tight little people's republic on the banks of the Charles. At Harvard, theory is all, and experience has no currency at all. A Harvard intellectual is the only man in the world who could be persuaded to sit down on a red-hot stove twice.

A mention of Boston harbor, the filthiest in America, sends him into a rage only slightly less hysterical than a mention of Willie Horton. "Boston harbor," he sneers to The New York Times. "We passed the Boston harbor clean-up bill in 1984, created a whole new agency..."

In the little Duke's mind, once "a whole new agency" is in place everything is done. The fact that everyone else can smell for himself that his harbor is a cesspool does not register in his brain.

He spent the 18 months of the primary season insulated from reality, and from the people of the nation whose high office he now seeks, speaking to no one but those who think like he does, who feel like he does, who preen like he does. "You admire my ethics, my goodness, my superiority," these people tell each other constantly, "and I'll admire yours."

He's entirely believable when he professes not to understand the commotion over the Pledge of Allegiance, nor how the common folk take their measure of what's in a man's heart. An interviewer asked him the other night whose fault was it that he took such a rough and splintery slide in public esteem when he was finally caught flashing his bizarre outlook on America.

"Nobody's fault," he said. "I think what happened is we suddenly found ourselves in a very different political environment, unlike anything we had to face during the primaries, and it took some time to adjust."

But the clock is running, and the little Duke stands naked in a land he despises.



Bush 88 Quayle

Coalition of American Nationalities

ISSUES NO. 7

OCTOBER 24, 1988

GEORGE BUSH AND "PEACE THROUGH STRENGTH"

VICE PRESIDENT GEORGE BUSH used the opportunity of the October 13th debate to once again lay out for the American people the fundamental differences between him and his opponent. Once again, the American people had the chance to see Michael Dukakis embrace, with no reservations, the liberal philosophy that is so out of touch with mainstream America. Dukakis consistently supported liberal policies on defense, the death penalty, criminal penalties, and economics -- all policies that are out of step with traditional American values. Dukakis did nothing to reassure the American people that he shares their values, or that he has the experience or leadership to govern this nation.

The VICE PRESIDENT continues to talk about the issues that matter to the American people -- a strong American, traditional values and continued economic opportunity and growth. GEORGE BUSH, in a series of speeches last week, again highlighted the vast differences in experience and approach in foreign policy between him and Dukakis. The American people know that when it comes to the national security responsibilities of the President, in keeping the nation safe from attack and in defending American interests abroad, GEORGE BUSH remains the best candidate for President and Commander-in-Chief.

- * George Bush does not want to leave American defenseless against ballistic missiles. George Bush supports research and deployment of the Strategic Defense Initiative - SDI.
- * George Bush believes in building deterrence by keeping the Soviets off-guard and keeping our own forces safe and stable. George Bush supports the Competitive Strategies Initiative -- the conventional defense improvement program.
- * George Bush will continue the Reagan-Bush policy of "Peace Through Strength", knowing that the what moves the Soviets is U.S. strength, the ability of the U.S. to deter aggression, and the unity of the democracies, and the U.S. willingness to make the cost for Soviet intimidation too high a price for them to bear.

In each of these areas, Michael Dukakis fails the test. Dukakis calls SDI a fantasy and a fraud, yet he is willing to spend a billion dollars a year on research. As George Bush stated, "we can't defend America with blueprints!" On conventional forces, Dukakis proposes a "conventional defense initiative", financed through drastic cuts in SDI and the cancellation of other strategic programs -- just at a time when the United States is negotiating with the Soviets about a 50 percent reduction in strategic weapons.

Perhaps most naive of all, is Michael Dukakis' understanding of the Soviet threat. Dukakis believes that the Soviet's recent flexibility is due to their own economic weakness -- a view that the Vice President concluded is far too simple, and even dangerous. Dukakis sees no role in renewed American strength as bringing the Soviets to the bargaining table and in driving them out of Afghanistan. Dukakis does not believe in peace through strength.

* * * ORGANIZATIONAL NOTES * * *

REMEMBER THAT THE ONLY POLL THAT COUNTS IS ON ELECTION DAY! The Vice President's message is taking hold across America and his outstanding debate performance gives us cause for optimism. BUT THIS RACE IS NOT OVER YET. GEORGE BUSH ISN'T LETTING UP AN INCH AND NEITHER CAN WE! We have all put a great deal of time and energy into this race -- but we cannot and must not rest on our laurels for the next two weeks if we want to put George Bush in the White House. WE'VE GOT TO CONTINUE BRINGING THE BUSH MESSAGE TO OUR COMMUNITIES, WE'VE GOT TO CONTINUE OUR WORK AND WE'VE GOT TO RE-DOUBLE OUR EFFORTS BETWEEN NOW AND ELECTION DAY TO SECURE EVERY VOTE WE CAN! THIS RACE IS GOING TO BE CLOSE AND WE CAN TAKE NOTHING FOR GRANTED.

We must keep our own personal check list of what, in addition to voting, we can do to make George Bush President. Have we written the editors of our local or community papers in support of the Vice President? Have we written an op-ed piece stating our reasons for supporting George Bush? Are there volunteers we can recruit for the campaign? Have we walked our neighborhoods urging them to support George Bush? Are we wearing a button? No effort is too small.

PERHAPS MOST IMPORTANT IS MAKING SURE WE GET OUT THE VOTE ON ELECTION DAY. TALK WITH YOUR LOCAL PARTY OR THE PARTY CHAIRMAN TO SEE WHAT THEIR EFFORTS WILL BE TO GET VOTERS TO THE POLLS. THINK OF WHAT YOU CAN DO ON YOUR OWN TO INSURE THAT THOSE WHO SUPPORT GEORGE BUSH GET OUT AND VOTE ON NOVEMBER 8TH. MAKE SURE THAT THOSE WHO YOU WILL KNOW WILL BE OUT OF TOWN ON ELECTION DAY GET AN ABSENTEE BALLOT -- IMMEDIATELY.

The Coalition of American Nationalities is pleased to announce the formation of the Hungarian American for Bush-Quayle '88 Committee. The Hungarian American Committee is co-chaired by Mr. Julius Belso, Chairman of the Hungarian American Republican National Federation, of New Brunswick, New Jersey and Mr. Frank de Balogh, 3rd Vice Chairman of the National Republican Heritage Groups Council, of South Pasadena, California. The Honorary Chairman of the Committee is Dr. Edward Teller, Senior Research Fellow at the Hoover Institution and a Member of the White House Science Council.

Dr. Teller has also been traveling to several cities the past few weeks, mobilizing support for the Vice President in the Hungarian American community, on a tour coordinated by Mr. Belso. Dr. Teller has made stops in Boston, MA; Cleveland, OH; New York City; Philadelphia, PA; New Brunswick, NJ; Washington, DC; Chicago, IL and Los Angeles, CA.

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The Issues

The Economy

The complaints about an issueless election particularly cite the deficit and the economy. Yet in fact, the great economic issue was framed and debated. The current prosperity either is or is not the result of nothing more than, in Senator Bentsen's phrase, \$200 billion in hot checks.

The complaint about a no-issues debate merely means that neither candidate has endorsed the pet proposal of the American public-policy elite, closing the deficit with a tax increase and cuts in Social Security benefits. The candidates listened to the voters, in our view sounder advisers. While we have no objection to applying a means test to Social Security, with the system in actuarial balance this is certainly not the first place we would look for spending cuts. Mr. Dukakis gave his budget priorities, cutting defense and suspending disbelief on the fanciful projections of uncollected taxes the IRS uses in lobbying for more bureaucrats. Mr. Bush proposes a "flexible freeze," an idiotic piece of rhetoric but not so idiotic a policy. In fact, the moderate degree of spending restraint embodied in Gramm-Rudman has already helped cut the deficit by almost half as a percent of GNP.

Despite the deficit preoccupation of Keynesians, the financial analysts and congenital critics of President Reagan, there are many more important economic statistics than how much of federal spending is covered by borrowing instead of taxing. To name a few: economic growth, inflation, interest rates, unemployment, job creation, the spending level itself. Most of these numbers have moved in a positive direction under the Reagan policy mix, and Mr. Bush and Mr. Dukakis differ enormously on the lessons of that experience.

In Thursday's debate, Mr. Bush certainly sounded like a convert to what he once christened voodoo economics. While tax rates have been cut, tax revenues have grown 25% over three years; "The way you kill expansions is to raise taxes." Mr. Bush would cut capital-gains taxes and expect to gain revenues. Mr. Dukakis calls this a \$40 billion, five-year tax break for the wealthiest one percent of the population—old-fashioned static analysis tax rhetoric. The dif-

ference here is not merely one proposal, but a whole mind-set. Mr. Dukakis has learned nothing from the Reagan economic experience: Mr. Bush proposes to extend its lessons into the future.

This difference is crystallized in the tax pledge. In some formal sense Mr. Dukakis is of course right that it's not realistic to promise no new taxes under any circumstances ever. If Congress put a line-item veto squarely on the table, we ourselves would be glad to strike a bargain on a gasoline tax. But if you rely on empty congressional promises of spending restraint, a new tax increase would merely open the spending floodgates, reducing the deficit temporarily if at all. The Reagan experience shows that, under current constitutional arrangements, a firm tax stand is the only reliable handle to constrain the size of the government and allow the private sector to grow. Mr. Dukakis would give up this lever and "work with Congress," Mr. Bush says, "Read my lips."

On the grand theme of the economy, the choice is before the voters.

National Security

On foreign affairs, Mr. Bush strikes the Reagan touchstone of "peace through strength." He supports the Reagan Doctrine of aiding freedom fighters, invoking its successes in Afghanistan and perhaps in Angola, as well as its failure through congressional inaction in Nicaragua. As he said Thursday, "You've got to understand that it is only the United States that can stand for freedom and democracy around the world."

Mr. Dukakis would "challenge Mr. Gorbachev" to sue for peace, but with no mention of the crucial leverage of U.S. military power. In Central America, he stresses "working with" Latin American leaders, as if this will persuade the Sandinistas to become democrats. Asked Thursday about a new land-based nuclear deterrent, Mr. Dukakis cited our 13,000 existing missiles—the old we-have-enough-weapons-to-blow-the-world-up-100-times cliché. "I don't rule out modernization," he said, though he implied we don't have the money for it, and certainly not for strategic defense. George Bush said, "The Soviets are modernizing. They continue to modernize. And we can't simply say, 'We've got enough nuclear weapons.'"

With the debates over and the election three weeks away, it's time to focus squarely on the central issues of this campaign. Despite the complaints that Vice President Bush and Governor Dukakis have consciously avoided significant issues, they differ clearly and profoundly on the major issues of any election. In a way, the issues needed little elaboration because they were so clear from the start.

Thursday evening's debate resolved what may have been the campaign's most complex question—the political character of George Bush. With his performance, Mr. Bush earned personal credibility as the heir to Ronald Reagan's political legacy. He aligned himself unapologetically with the President's politics, while leaving sufficient openings to shape a future consistent with his own personal beliefs, building a personal rapport with the American citizenry.

Governor Dukakis, perhaps to his credit at this late stage, declined to alter or soften his personality to suit the political technicians. If Mr. Dukakis fails, his failure will not be one of personality, but of substance. He will have been bested on the three broad issues that define all Presidential races:

Values

Discussions of the ACLU, liberals, the Pledge of Allegiance and furloughs for murderers have served as a long-overdue opportunity to face fundamental differences over which values should inform America's civil and political life. These arguments have involved the most basic questions about the community's right to exercise prudent, legitimate authority over its members, and about the responsibility individuals must assume to ensure civilizing habits of life within the community.

Mr. Bush, in his various attacks, has repeatedly asserted this argument on behalf of the community's sustaining values. Governor Dukakis and his supporters offer no more serious answer than to wave away these issues as irrelevant or unacceptably negative. This refusal to concede any legitimacy to these widely shared concerns has crippled the Dukakis campaign, and is likely to ensure that the word "liberal" remains a political albatross. But on values, it cannot be said the voters have no choice.

The Wall Street Journal, October 17, 1988

Continued from previous page

The Mandate

Despite these clear differences, the post-election conventional wisdom will say there were no issues and there is no mandate, at least if the Bush campaign merely coasts to the victory many now predict. Yet with his Thursday night debate performance,

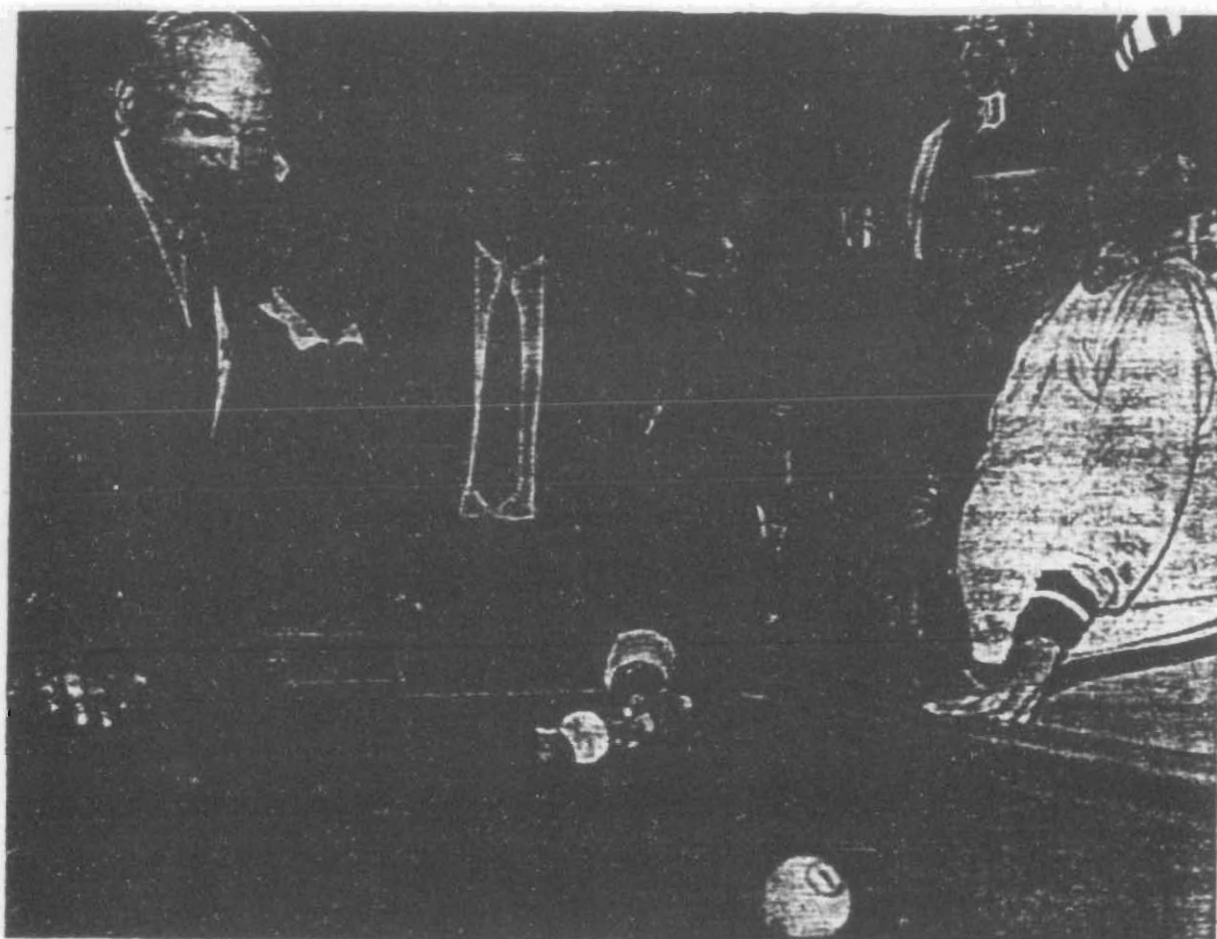
Vice President Bush occupies a particularly strong position; at last, he truly has the Big Mo'.

The Vice President's next task is to spend three weeks laying the foundation for a four-year presidency. It's become an axiom of our politics that a new President essentially has a year to force his agenda through a hostile

Congress. To prepare, Mr. Bush needs to make the differences more explicit, to make the election a national referendum on the programs and proposals he would take to Congress. Mr. Bush should now seek to claim in victory that he represents not the politics of one man, but the will of the electorate.

Italian Americans for Bush-Quayle '88 Vice Chair and National President of the Order Sons of Italy, Joseph Avara joins Vice President Bush in Trenton, New Jersey for that city's Columbus Day celebration.

The Washington Post, October 11, 1988



PHOTOS BY RICH LIPSON—THE WASHINGTON POST

While in Trenton, Bush played billiards at local pool hall and spoke on victims' rights to an Italian-American audience.

Mr. Avara appears to the left of the Vice President.

Paid for by Bush-Quayle '88

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Bush Pushes 'Peace Through Strength'

Churchill 'Iron Curtain' Speech Recalled; Dukakis Tank Ride Ridiculed

By David Hoffman

Washington Post Staff Writer

FULTON, Mo., Oct. 18—Invoking the historic "Iron Curtain" address of Winston Churchill and the modern technique of campaign ridicule, Republican presidential nominee George Bush leveled a double-barreled barrage at Democrat Michael S. Dukakis today.

First, Bush cited the turmoil in the Soviet Union and its satellite nations as evidence that President Reagan's policy of "peace through strength" has worked. Forty-two years after Churchill warned here that an Iron Curtain was descending across Europe, Bush said, "it's a rusting curtain" and "shafts of light from the western side, our side, the free and prosperous side, are piercing the gloom of failure and despair on the other side."

Second, Bush planned tonight to broadcast a new television ad ridiculing Dukakis as a risk to national security. The commercial, using news footage of a Dukakis "photo opportunity" in an M1 tank, was to be aired during the World Series.

"Michael Dukakis has opposed virtually every defense system we developed," an announcer says as Dukakis is shown riding in the tank at the General Dynamics plant in Sterling Heights, Mich. Listing such hardware as aircraft carriers, antisatellite weapons, four missile

systems and the Stealth bomber, the announcer continues: "He even criticized our rescue mission to Grenada and our strike on Libya. And now he wants to be our commander-in-chief." The screen shows a close-up of the helmeted Dukakis smiling. "America can't afford that risk."

With new polls showing his lead over Dukakis wider than before last week's debate, Bush today also turned his attention to battling overconfidence among Republicans and his campaign troops. According to a senior Bush adviser, campaign chairman James A. Baker III has issued a "complacency alert," under which campaign workers are going on a seven-day-a-week schedule and gearing up for a final three-week drive.

Bush opened his foreign policy address at Westminster College here this afternoon with a political note that recalled President Harry S. Truman, who accompanied Churchill to this school in 1946 for the famous Iron Curtain speech.

"Those two men offer a very personal lesson for me. They knew the ups and downs of political life like few others. They knew that political opinion polls can be very misleading. They knew that no vote can be taken for granted. And above all, they knew that no election was over until it was really over," Bush said.

"I'm not taking any votes for granted," he said. "I will continue to campaign as an underdog. My strategy is to run hard, stand on the issues and fight this election right to the wire. And I intend to win it."

"We're not going to lighten up," Bush told reporters earlier. "If I find anybody letting up in my campaign—they're history." He added, "Watch my smile. Watch my work. Watch how fast we go and where we go—we're not letting up. The worst thing I could do would be to show a complacency I don't feel or an overconfidence I don't feel."

In his foreign policy address today, Bush offered no new insights into how he might deal with the Soviet Union. Rather, he repeated his cautious assessment of developments in the Soviet Union and Eastern Bloc. Bush recalled Churchill's statement that "From Stettin in the Baltic to Trieste in the Adriatic, an Iron Curtain has descended across the continent." Bush said many Americans wanted to turn inward after the war but "Churchill was right" to warn of Soviet aggression and "four decades later, he has been vindicated."

"The Iron Curtain still stretches from Stettin to Trieste," Bush said. (Trieste, contested territory between Yugoslavia and Italy in 1946, when Churchill spoke, is now in

Italy and technically not in the Eastern Bloc.) Bush noted recent reforms advocated by Soviet leader Mikhail Gorbachev. "The Kremlin, which echoed once to the ominous footsteps of Stalin, now resounds to a denunciation of Stalin. There is new hope of change. The truth is being sought as never before. The peoples of Eastern Europe, the peoples of the Soviet Union itself, are demanding more freedom, demanding their place in the sun."

Bush said the peoples of the East are dissatisfied with their deteriorating economies and "70 years after the Russian Revolution, Marxism is losing its luster."

But, Bush said, "it would be far too simple, even dangerous, to conclude, however, that Soviet foreign policy is driven exclusively by economic weakness" He said that while the Soviets are "restrained by their own troubles," they are "also restrained by our strength, our ability to deter aggression, the unity of the democracies." Bush did not mention Dukakis by name in the speech, but warned against those he said would "abandon realism about what moves the Soviet Union."

**PATRICK
BUCHANAN**

On the home bench

"These [Supreme Court] appointments are for life, and when the vice president talks about liberals on the bench, I wonder who he is talking about."

With that disingenuous remark, "moderate Mike" of Thursday night's debate pooh-poohed the notion he would name fellow ACLU activists to the Supreme Court.

Wherever could Vice President George Bush have gotten such an idea! "I don't appoint people I think are liberal or people who . . . I think are conservative. I appoint people of independence and integrity and intelligence."

The governor's assurances, however, are belied, not only by previous statements wherein he advanced the ultraliberals William Brennan and Thurgood Marshall as his ideal justices, but by his own record in Massachusetts.

As former Assistant Attorney General Charles Cooper wrote Friday in *The Wall Street Journal*, the only two Dukakis nominees to the Massachusetts Supreme Judicial Court, law professor Paul Liacos and Judge Ruth Abrams, are liberal activists of the Rose Bird school of jurisprudence, whose votes and opinions expose them as "fervent proponents of the ACLU's liberal social agenda," and "committed to imposing it through judicial decree."

On the ACLU's litmus test issue, capital punishment, both justices have voted to strike it down in every case where it has come up, even after the people of Massachusetts voted to put the death penalty back in the state Constitution. As Justice Liacos virily declared, the death penalty is simply "antithetical to the spiritual freedom that underlies the democratic mind."

But the Liacos-Abrams solicitude for the criminal class goes far beyond keeping hope alive for the Bay State Willie Hortons. Justice Liacos has argued that a mandatory 25-year sentence for narcotics kingpins is "cruel and unusual punishment," that police roadblocks to keep the intoxicated off Massachusetts highways violate the constitutional

rights of drunken drivers. Justice Abrams, in a celebrated case, found that convicts' rights had been violated because they had not been provided with absentee-voter registration forms, leading the victorious defendant to set up a Massachusetts League of Prison Voters, another Bay State first.

In a case that may help explain the Boston Police Union's dumping of the Duke for George Bush, Justice Liacos ordered a police department to pay the hospital bills of a felon shot trying to escape arrest — even though the cop had fired a warning shot and escorted the thug to the emergency room. (Even Justices Brennan and Marshall choked on this one, joining a unanimous Supreme Court in dumping over Justice Liacos' "rather novel Eighth Amendment approach.")

In one especially gruesome case, where Justices Abrams and Liacos helped overturn the conviction of a father who had raped both his 6- and 8-year-old daughters, the justices claimed the father's rights had been violated when the girls were allowed to testify and be cross-examined by television, from another room, rather than endure the "psychological trauma" of facing their father again.

On gay rights, the Liacos-Abrams opinions come right out of the ACLU policy guide. The right of privacy, they have both declared, covers sexual acts committed in the front seat

of a car in a parking lot beside a public highway as well as homosexual acts performed in a peep show cubicle in a pornographic movie theater. The pair were also decisive in the 4-to-3 Massachusetts Supreme Court decision dumping over the state's "child pornography" law, when they ruled that the First Amendment protected a stepfather's right to put his 15-year-old stepdaughter up on a bar and photograph her half-naked.

While both justices have expansive views of the First Amendment rights of nude go-go dancers (not only have they a constitutional right to perform in public bars, but also to solicit drinks), Justices Liacos and

Abrams have a restrictive view of the First Amendment rights of public school teachers, having ruled it unconstitutional to tell schoolchildren they can meditate silently or pray for a minute at the opening of class.

Mr. Dukakis' choice for Chief Justice of Massachusetts, Edward Hennessey, comes out of the same ACLU cookie-cutter.

Alone on the court, the chief justice said that the felons who fled, while on the now-famous Dukakis furloughs, could not be prosecuted — "because it is not consistent with common usage to hold that a failure to return constitutes an escape."

The chief justice also led the court in overturning a state law which gave preference in hiring to disabled veterans, asserting that to provide such an advantage to an eyeless, armless or legless Vietnam vet was "arbitrary and capricious" and, moreover, could have an "adverse impact" on the "efficient operation of the public service."

Chief Justice Hennessey also joined the opinion, reinstating to the Massachusetts bar, as a person "of good character," the traitor Alger Hiss, even though the convicted perjurer persists with the pack of lies he told in 1948 about not being Josef Stalin's spy.

As Mr. Cooper notes, both "Justice Liacos and Justice Abrams have been named in national legal publications as leading candidates for appointment to the U.S. Supreme Court in a Dukakis administration." As, incidentally, has Susan Estrich, the Dukakis campaign manager, who headed the Massachusetts ACLU in 1985-86 and is the nation's leading advocate of giving homosexuals equal rights to marry and adopt children. Ms. Estrich personally went into court in 1982 to force the city of Pawtucket to get its nativity scene off public property.

We are forewarned, friends. If we want an ACLU-dominated Supreme Court that will make us look back upon Thurgood Marshall and William Brennan as centrists, then let's go out and save the Duke — because that is what his past rhetoric and his past record indicate he has in store for the American people.

October 19, 1988



FURLOUGHED KILLER RESPONDS: The convicted killer, freed on a Massachusetts prison furlough during Michael Dukakis' time as governor, then jailed for rape and kidnapping in Maryland, said George Bush has lied about his case. In a telephone interview with Gannett News Service from Maryland Penitentiary in Baltimore, Willie Horton cited "a lot of misperceptions" but declined to elaborate. "I'm not sure if the public would be willing to hear what I have to say." Asked his choice for president, Horton — who cannot vote — said, "Obviously, I am for Dukakis."

ACLU

AMERICAN CIVIL LIBERTIES UNION
CALIFORNIA LEGISLATIVE OFFICE
1127 11th Street, Suite 605 ☐
Sacramento, California 95814
Telephone (916) 442-1036 ☐

May 26, 1988

Members, Assembly Education Committee
State Capitol
Sacramento, CA 95814

Re: SB 2394 - Oppose

Dear Members:

The ACLU regrets to inform you of our opposition to SB 2394 concerning sex education in public schools.

It is our position that teaching that monogamous, heterosexual intercourse within marriage is a traditional American value is an unconstitutional establishment of a religious doctrine in public schools. There are various religions which hold contrary beliefs with respect to marriage and monogamy. We believe SB 2394 violates the First Amendment.

If you or your staff wish to discuss this matter further, please contact our office.

Very truly yours,

Marjorie C. Swartz
MARJORIE C. SWARTZ
Legislative Director

Francisco Lobato
FRANCISCO LOBATO
Legislative Advocate

FL/rme

cc: Consultant, Assembly Education Committee
The Hon. Newton Russell, State Capitol, Room 5061, SAC 95814
(Disc #2 Mis. Com. Ltrs. 88')

Marjorie C. Swartz, Legislative Director • Francisco Lobato, Legislative Advocate • Rita M. Egan, Legislative Assistant
ACLU of Northern California • Dorothy M. Smith, Executive Director • ACLU of Southern California • Ramona Ripston, Executive Director
1663 Mission Street, Suite 400 • San Francisco, 94103 • (415) 621-2493 • 633 South Shore Place • Los Angeles, 90005 • (213) 467-1720

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Bush 88 Quayle

Coalition of American Nationalities

ISSUE NO. 8

NOVEMBER 1, 1988

* * * COUNTDOWN TO NOVEMBER 8TH * * *

ONE WEEK TO GO!! Only one week remaining in the campaign, one week in which to reach the goal that each of us has been working towards -- ELECTING GEORGE BUSH AS OUR NEXT PRESIDENT OF THE UNITED STATES -- a reality. And we can make a difference in this last week. What counts now are votes and between now and November 8th we need to: 1) continue our efforts to win over every voter we can for George Bush; and 2) make sure that we get each and every one of George Bush's supporters to the polls on election day. Both are essential to a George Bush victory.

THIS RACE IS NOT OVER AND IT'S GOING TO BE A CLOSE ONE. NOW IS NOT THE TIME FOR COMPLACENCY. WE NEED TO CONTINUE TO WORK HARD TO MAKE SURE THAT WE GET GEORGE BUSH EVERY VOTE WE CAN IN OUR COMMUNITIES. GEORGE BUSH SAYS HE'S RUNNING AS IF HE'S 10 POINTS BEHIND, OUT THERE WORKING EVERY DAY AND SCRAPING FOR EVERY VOTE -- WE NEED TO DO THE SAME AND DELIVER THOSE VOTES ON ELECTION DAY.

George Bush has campaigned on the issues -- the concerns that he believes we all share for America and her future. George Bush has laid out for the American people his message and where he intends to lead this nation. We know where George Bush stands on the issues. But we need to continue to make sure that our friends, relatives, neighbors -- our communities -- know that when it comes to their concerns George Bush stands with them. George Bush has set out for America the fundamental differences that exist between himself and the Governor of Massachusetts. George Bush:

- o Pledges Not to Raise Your Taxes
- o Supports a Balanced Budget Amendment to the Constitution
- o Supports Aiding Pro-Democracy Freedom Fighters
- o Supports a Policy of "Peace Through Strength"
- o Supports Restoring Voluntary Prayer in Schools
- o Supports Mandatory Sentencing for Convicted Murderers
- o Opposes Taxpayer Funded Abortions
- o Supports Bringing Traditional Values Back to Education

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And now, on issue after issue, the evidence is becoming clear that the American people are rejecting the Governor of Massachusetts' call for a return to the days of Jimmy Carter Malaise and the failed far-left, liberal, McGovernite policies of tax and spend, and big government. Michael Dukakis, from the beginning, has sought to hide from the American people his own far-left agenda. George Bush has helped the American people see through the disguise and cast the Dukakis record for what it really is. On November 8th Americans will render their verdict.

ORGANIZATIONAL NOTES

Several weeks ago, we suggested the idea of a Native Language Phone Bank as a tool for building support for George Bush among the nationality communities. WE URGE YOU ONCE AGAIN TO UNDERTAKE THIS EFFORT AS A MEANS TO GET-OUT-THE-VOTE IN YOUR COMMUNITY ON ELECTION DAY. You may also wish to coordinate this activity with your local Bush-Quayle '88 or Victory '88 office as a volunteer project. You may even wish to organize your own volunteer effort to carry out this project. Again, please remember that this is a no-cost, effective program that you can do from your own phone.

We also urge you to circulate this issue of the weekly mailing or any past issues and information to those members of your community who may still be undecided voters. GET THE WORD OUT ON WHERE GEORGE BUSH STANDS ON THE ISSUES AND THE CRITICAL DIFFERENCES BETWEEN THE VICE PRESIDENT AND THE GOVERNOR OF MASSACHUSETTS ON THE IMPORTANT QUESTIONS THAT FACE AMERICA. The voter who knows the real Dukakis record is a Bush voter.

REMINDER. WHAT ELSE YOU CAN DO BETWEEN NOW AND NOVEMBER 8TH TO MAKE GEORGE BUSH PRESIDENT. One last walk through your neighborhood urging individuals to support George Bush? Volunteering or recruiting volunteers for the local campaign office? Remember that many offices are putting out last minute mailings and could use plenty of help to get the mailings out the door. Can you help the local party get voters to the polls on election day? What is it that you may have missed?

Finally, please be aware that your local radio stations will be doing special call-in shows on the presidential race. We urge you call into these shows and express your support for George Bush for President. Tell your friends to also express their support.

* * * *

Finally, a note of thanks to all of you for your own active commitment and efforts throughout this campaign in helping the Vice President and the Coalition of American Nationalities to reach each of your nationality communities. Your assistance has been invaluable to George Bush in his efforts to reach ethnic America with the Bush message and in letting them know he shares its concerns about America's future. We thank you for your important contribution to this campaign. Your efforts have made a difference in our program. We thank you.

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Bush's son, ethnic leaders meet



PD/ROADELL HICKMAN

MARVIN BUSH: His father, Vice President George Bush, "has got a vision for America that is based on over 20 years in public service in foreign affairs and domestic affairs."

By **HARRY STAINER**
STAFF WRITER

Marvin Bush came to Cleveland yesterday to campaign among ethnic leaders for his father, Vice President George Bush.

Despite polls that Cuyahoga County Republican Party Chairman Robert E. Hughes said indicated George Bush would carry Ohio in next month's presidential election, Marvin Bush said the Republican campaign was not taking such news for granted.

Bush, 31, said that although his father was confident of winning Ohio, the campaign was not overconfident. Ohio is a critical state, and George Bush and Sen. Dan Quayle will make 23 stops in the state between now and the Nov. 8 election, said a campaign aide accompanying Marvin Bush.

Bush said his father was running in all 50 states, including Massachusetts, unlike Massachusetts Gov. Michael S. Dukakis, who Bush said pulled out of Florida. However, he said, the vice president and key campaigners will "spend a disproportionate amount of our time in California, Texas, Georgia, Ohio, Pennsylvania, Michigan, Illinois and maybe one or two others."

"My dad's got a very different vision of what this country should be doing in the next eight years than Mike Dukakis does," Bush said. "We're not going to change. That's the difference between the campaigns."

"My dad has not changed what he talks about based on yesterday's polls. He's got a vision for America that is based on over 20 years in

public service in foreign affairs and domestic affairs."

Bush made the comments in a news conference at county Republican headquarters after first talking to about 100 ethnic representatives from around the state at the Holiday Inn Lakeside.

Accompanying him was Edward J. Derwinski, an undersecretary for security assistance in the State Department and a former congressional representative from Illinois. Derwinski said that as long as he is not involved in fund raising and does not attack anyone, he can campaign for his friend, George Bush.

Derwinski said he cited to ethnic leaders the experience and qualifications of Bush. Paul Mifsud, vice chairman of the Bush Quayle '88 Ohio Committee, said the comments were made to a meeting of the Ohio Nationalities for Bush Committee.

The ethnic meeting stressed ethnic voter identification, issues and how important ethnics were to the Bush campaign, a campaign spokesman said.

The ethnic vote campaign was reminiscent of the nationalities alliance former Mayor Ralph J. Perk organized to support his campaigns. Perk, who is ill, was not present but said from home that many who attended the meeting were members of his American Nationalities Movement.

Hughes said polls indicated that Bush would carry Ohio because Dukakis would not win enough of a margin in Cuyahoga County. In addition to seeking ethnic votes, Hughes said, Republicans would seek the votes of minorities.

Paid for by Bush-Quayle '88

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PATRICK BUCHANAN

Feeling the force of Catholic power?

Suddenly, Vice President George Bush is leading in New Jersey, Ohio, Michigan and Illinois, with an outside chance in Pennsylvania and New York. And while there has been much debate about how Mr. Bush turned around that 17-point deficit, there has been little discussion of who it was that deserted the Duke. My guess is the answer may be found in three words: the Catholic vote.

Though Catholics receive little of the newsprint allocated to more fashionable minorities, the Catholic vote is enormous, more than twice as large as the black vote, and 10 times the size of the Jewish vote.

(To appreciate potential Catholic power, consider this: For George Bush to raise his share of the Catholic vote, say, from 35 percent to 42 percent, i.e. seven points, is the rough equivalent of raising his share of the Jewish vote from 30 percent to 100 percent.)

Moreover, Catholics, the largest religious minority in America, are "swing voters;" they can, and have, shifted massively from one election to the next.

Richard M. Nixon's career is testament to Catholic power. In 1960, the vice president, whose nailing of Alger Hiss and anti-communist credentials gave him great credibility with Catholics, carried only 20 percent of the Catholic vote against John F. Kennedy. Eight years later,

however, against Hubert H. Humphrey, Mr. Nixon's share rose dramatically, to 33 percent, offsetting losses of Protestant voters to George Wallace. In his 49-state triumph of 1972, Mr. Nixon became the first Republican in history to sweep more than half (55 percent) of the Catholic vote; it was Catholics who shifted the Humphrey states of New York, Pennsylvania, Michigan, Minnesota, Maryland and Missouri into the Nixon column in 1972.

Ronald Reagan, whose share of the black vote remained static at 10 percent, and whose share of the Jewish vote actually fell from 1980 to 1984, is likewise living proof of Catholic power.

"How many divisions does the pope have?" was Stalin's derisive reply to Franklin D. Roosevelt's mention of Pius XII. In American politics, however, the big battalions are Catholic — German and Irish, Italian and Polish, Ukrainian and Cuban, Mexican and Baltic, Filipino and Vietnamese.

And the shift in the Catholic vote surely explains Mr. Bush's dramatic turnaround in the Northeast and Middle West.

Actually, Catholics have been moving for half a century away from the party that nurtured them. German and Irish, they were anti-British and isolationist in the pre-war era; then, they were appalled at Mr. Roosevelt's fumbling incompetence at Yalta, leaving Catholic Poland and Eastern Europe in Stalin's hands. After 1948, they walked away from Harry S. Truman over communism and Korea, rallied to Mr. Nixon and Eugene McCarthy, and moved toward Gen. Dwight D. Eisenhower when the Democrats offered up the first of their soft, cerebral liberals, Adlai Stevenson. Jack Kennedy brought them home; but George McGovern and the radicals of the

counterculture drove them out of the party again, to Mr. Nixon and the Republicans.

In my judgment, Massachusetts Gov. Michael Dukakis opened up that huge post-convention lead because his acceptance speech — America's first look at Mike Dukakis — was a minor masterpiece in how it resonated with Catholic America. The man at the podium that night neither looked nor spoke like a Stevenson-Mondale-McGovern liberal; he appeared strong, self-confident, conservative, proud of his traditional family and ethnic heritage; his message seemed to say to Catholic America "I am just like you; I am one of you."

And it is among these same Catholics that Mr. Bush's attacks — the demonizing of the little Duke as anti-military (against M.X. SDI, Midgetman, Grenada, etc.) and soft on crime (Willie Horton and the furloughs) — have been so effective, so destructive: here, Mr. Dukakis' "card-carrying" membership in the American Civil Liberties Union is absolute murder.

What the prestige press ignores, or refuses to understand, is that among traditional Catholics, the ACLU is anti-cop, anti-flag, anti-family and anti-cross. (Last week, the ACLU endorsed the notion that the First Amendment protects the burning of the American flag, but prohibits public school teachers from telling children that monogamy within marriage is preferred sexual behavior.)

While Ronald Reagan, with his articulate anti-communism, his stand against abortion, his emphasis on family values, his charisma, convictions and incomparable image as George Gipp, All-American from Notre Dame, had immense appeal for Catholic voters, the Democrats had a historic opportunity to bring them home. George Bush, of Andover and Yale, of elite prep schools

and exclusive country clubs, had none of Mr. Reagan's reach. Yet, he is winning Catholics over by the millions — by painting the Duke as soft on crime, soft on the Soviets and weak on defense, and by exhibiting strength, toughness and aggressiveness.

Reared in authoritative, sometimes authoritarian, institutions, family, the Old Church and the old schools, Catholics do not automatically recoil at the exercise of legitimate moral authority. Indeed, they rather expect it. Put off by gabby intellectuals, they respond to strong

leaders, men of action, not men of words.

If all goes well in November, the GOP should adopt a program advancing Catholic issues and appointments to wield the immense Catholic vote permanently to the GOP. But that comes later.

Today, Messrs. Bush, Atwater, Ailes and Baker will be making a mistake if they do not answer in kind the latest attacks from "Diamondback" Lloyd Bentsen and the little Duke. Save "Gentle George" for the inaugural; right now, let's see more of the old pit bull.

The Washington Times, October 25, 1988

For President

The presidential campaign of 1988 boils down to the simple question: Who best will help the United States build upon the prosperity of the 1980s while preparing for the challenges of the 21st century? We endorse the Bush-Quayle ticket because we consider the vice president and the senator from Indiana more likely to promote continued economic growth and strategic strength.

We base our endorsement on the ways in which we think the candidates would respond to the following critical challenges.

● **Restoring the presidency:** Ronald Reagan has reshaped American political debate in the last eight years, but he also has allowed Congress to gobble up enormous new powers, particularly in the area of foreign policy. Michael Dukakis, talking frequently about working with Congress, seems little likely to stem Congress' voracious appetite for power. George Bush, who has complained cautiously about Congress, seems far more likely to work toward restoring presidential power, prestige and credibility through the aggressive use of vetoes and creative policies designed to restore power to the people — and not to Congress.

● **Sustaining the recovery:** The United States now enjoys its longest peacetime recovery ever. The economy continues to grow at a brisk rate — roughly 4 percent this quarter — the unemployment rate has fallen to its lowest point in more than a decade and a larger portion of the public now works than ever before. Michael Dukakis sees all this as an excuse to redistribute wealth; George Bush more properly portrays it as a chance to create opportunities for "have-nots."

On the great bugaboo of the age, the congressional budget deficit, George Bush proposes a "flexible spending freeze" to close the deficit gap within five years. Lawrence Kudlow, chief economist for Bear, Stearns & Co., has calculated that Mr. Bush needs but \$18 billion in spending cuts to put the budget on a path that would balance it in five years. This assumes, of course, that Mr. Bush wouldn't load up the budget with a host of expensive new programs. If he hurls money wantonly at "good, Republican programs," the budget beast will consume him. If he takes advantage of important, non-interventionist innovations in economics and environmentalism, he will be able to pioneer compassion that actually works and helps improve the lot of the poor without looting the earnings of the middle class.

Michael Dukakis has foreclosed such options by proposing new programs that would cost at least \$200 billion over the next four years. This matches his record in Massachusetts, where he has nearly doubled state spending in five years, converted a \$1 billion state budget surplus into a deficit of nearly \$1 billion (the equivalent of turning a \$100 billion national surplus into a \$100 billion deficit in three years), gutted the state pension system and nearly doubled the number of workers on the state payroll.

Mr. Dukakis says he'd pay for mega-government by improving tax collections. That's sheer fiction and he knows it. His second option is to raise taxes, which is sheer economic disaster.

● **Honoring values:** Ronald Reagan built an enormously popular and powerful political coalition by appealing to fundamental American values: family, home, church, school, community. He promised to draft laws and appoint judges who revered individual freedom and wisdom, and who wouldn't demand statist solutions to personal problems. George Bush has promised to continue that tradition, and it seems likely that he'll appoint judges and legal officers who understand the importance of a strong rule of law — and a judiciary that fights to defend the rights of individuals.

Michael Dukakis' record indicates otherwise. One or both of his two selections for Massachusetts' highest court have over the last few years invalidated all death penalty statutes to come before the court, argued to overturn a murderer's conviction because of a flawed jury instruction that was favorable to the defendant, voted to overturn the conviction of a father who raped his six- and nine-year old daughters because the daughter testified against him on camera rather than undergo the trauma of testifying against him face-to-face, argued that towns had a constitutional obligation to pay the medical bills of criminals shot by police while fleeing arrest, and struck down child-pornography statutes. That's only a partial list, but it gives a clear indication of where a Dukakis-appointed court might go.

Mr. Dukakis talks about bedrock values, but doesn't seem to understand them. His policies reflect a genuine distrust of the values that most Americans hold dear, and his

The Washington Times, October 25, 1988

technocratic approach to government gives the impression that he considers average Americans incompetent to judge what best serves their interests.

● **International economy:** The next president must be able to respond appropriately to growing economic competition from Europe and Asia, where supply-side tax cuts and industrial deregulations have stimulated great economic expansions. Michael Dukakis proposes "public-private partnerships" — a fancy name for old Republican corporate capitalism — protectionist trade policies and restrictions on the flow of capital into the United States. These maneuvers would turn the United States into an isolated economic backwater.

George Bush in contrast has advocated free trade, improvements in international monetary policy and deregulation that would enable the United States to thrive in an increasingly competitive world.

● **Strategic thinking:** Mikhail Gorbachev has not eliminated traditional enmity between East and West, but he has changed the geopolitical equation. The U.S.S.R. is changing at a furious pace — one can barely keep up with the changes announced in each day's newspapers — and the next president must possess the intellectual and strategic agility to understand those changes and respond to them in a way that advances American strategic and economic interests.

At a minimum the United States must make it clear that it has no qualms about projecting power prudently. Michael Dukakis still doesn't seem to understand the role that the Reagan-era deployment of Pershing II and Ground Launched Cruise Missiles played in coaxing the Soviets to negotiate an Intermediate-Range Nuclear Forces treaty. He does not understand the way in which the Reagan Doctrine promoted settlements in Angola and Afghanistan — and could have made peace and democracy thinkable in Nicaragua. And he does not understand the difficulty and expense of modernizing our strategic deterrent. George Bush understands all these things.

Mr. Bush also knows that a pacifist White House could weaken European allies, who are fighting a wave of pacifism at home. The Western alliance more than ever needs a leader willing to think and talk realistically about Soviet threats and opportunities. Michael Dukakis has demonstrated no such ability. Mr. Bush and top advisers such as James A. Baker III and Richard Darman know that we must insist that the Soviets link improved relations to significant policy changes, ranging from withdrawal from regional conflicts to convertibility of the ruble.

● **Leadership and vision:** The Dukakis camp has decided in the dying days of the campaign to make this a divisive election. When George Bush talks about crime, it charges racism. When the vice president mentions the economy, the Dukakis camp warns of impending doom. When Mr. Bush discusses international trade, the Dukakis camp talks of foreign menaces. And in all instances, Mr. Dukakis dismisses fair characterization of his record as "distortion."

Most triumphs in Massachusetts — from tax cuts to elimination of the furlough program — took place over Michael Dukakis' objections, although he gladly accepts credit for their salutary effects. He meanwhile has misled the public about such things as his policy of raiding the state pension fund — now the nation's most underfunded, with Mr. Dukakis having transferred more than \$650 million this year from the system to his budget — to pay for his new social programs. He has gotten a free ride on the issue of "competence" from liberal commentators and newspapers, which haven't bothered to match rhetoric to fact.

George Bush to his credit has not tried to set poor against rich, whites against blacks, liberals against conservatives. While he hasn't articulated a clear vision of George Bush's America — a failure that may make it impossible for him to provide coattails for congressional candidates — he has made it clear that he will not preside over an enormous expansion of government and contraction of popular sovereignty. He also has grasped the critical fact that the Reagan Revolution was not an era in itself, but merely a springboard to an era of growth, hope, confidence and strength.

This year's presidential contest, contrary to popular opinion, offers a choice between Michael Dukakis, who regards the United States as a declining empire, and George Bush, who relishes the nation's future potential. We consider the Bush-Quayle ticket far superior on every significant campaign issue, and strongly endorse Mr. Bush for president of the United States.

The Times, October 11, 1988

Bush courts Burg's Italian Americans

By JIM GOODMAN
Staff Writer

TRENTON — Vice President George Bush courted crucial Italian-American voters yesterday — Columbus Day — with a law and order speech and a hand-shaking tour of the Chambersburg section of the city.

Bush, running from four to eight points ahead of Democrat Michael Dukakis in state polls of the presidential race, spoke to more than 300 invited guests at Roman Hall, a restaurant and banquet hall in the heart of Trenton's Italian-American community.

Chambersburg, Bush declared, is a symbol of what a community can do when it wants to keep its streets safe and its family values intact.

The GOP presidential candidate renewed his campaign pleas for tougher penalties and more prisons for criminals, the death penalty for major drug dealers and a coordinated program for a "Drug-Free America."

He announced the formation of a "Drug-Free America Coalition" and named Gov. Thomas H. Kean an honorary chairman of the group.

The key "to fighting crime," Bush declared is "community action." He praised the "Neighborhood Watch" program in the city under which local residents patrol the streets to deter crime.

Bush reemphasized his campaign pledges to double the federal prison budget and run a "White House that won't tolerate crime — that stands for firm sentences and judges which will uphold them."

The vice president said he was "emotionally drained" when he met recently with some victims of violent crimes.

The GOP presidential candidate renewed his campaign pleas for tougher penalties and more prisons for criminals, the death penalty for major drug dealers and a coordinated program for a "Drug-Free America."

"WE STILL have too many liberal, permissive judges in this country," he declared.

Bush walked two long blocks of Butler Street, the same business-residential neighborhood where President Jimmy Carter spoke in 1977 and Democratic presidential candidate Walter Mondale walked in 1984.

In the process, Bush hugged babies, kissed a 93-year-old grandmother who could barely speak English, shot pool at the Kent Athletic Club and waded into friendly crowds along the street in the middle of a neighborhood that was once almost invincibly Democratic.

The Bush visit yesterday and the planned trip to West Orange in the northern section of this state tomorrow are all part of a Republican effort to hold on to the dramatic gains President Reagan made with Italian-American voters in his 1980 and 1984 New Jersey landslide victories.

Bush campaign officials here say that 1984 exit polls indicated that 23 percent or 437,000 of Reagan's 1.9 million votes in 1984 came from Italian-Americans.

• see BUSH, A6

The Times, October 11, 1988

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Bush, running from four to eight points ahead of Democrat Michael Dukakis in state polls of the presidential race, spoke to more than 300 invited guests at Roman Hall, a restaurant and banquet hall in the heart of Trenton's Italian-American community.

Chambersburg, Bush declared, is a symbol of what a community can do when it wants to keep its streets safe and its family values intact.

The GOP presidential candidate renewed his campaign pleas for tougher penalties and more prisons for criminals, the death penalty for major drug dealers and a coordinated program for a "Drug-Free America."

He announced the formation of a "Drug-Free America Coalition" and named Gov. Thomas H. Kean an honorary chairman of the group.

The key "to fighting crime," Bush declared is "community action." He praised the "Neighborhood Watch" program in the city under which local residents patrol the streets to deter crime.

Bush reemphasized his campaign pledges to double the federal prison budget and run a "White House that won't tolerate crime — that stands for firm sentences and judges which will uphold them."

The vice president said he was motionally drained when he met recently with some victims of violent crimes.

The GOP presidential candidate renewed his campaign pleas for tougher penalties and more prisons for criminals, the death penalty for major drug dealers and a coordinated program for a "Drug-Free America."

"WE STILL have too many liberal, permissive judges in this country," he declared.

Bush walked two long blocks of Butler Street, the same business-residential neighborhood where President Jimmy Carter spoke in 1977 and Democratic presidential candidate Walter Mondale walked in 1984.

In the process, Bush hugged babies, kissed a 93-year-old grandmother who could barely speak English, shot pool at the Kent Athletic Club and waded into friendly crowds along the street in the middle of a neighborhood that was once almost invincibly Democratic.

The Bush visit yesterday and the planned trip to West Orange in the northern section of this state tomorrow are all part of a Republican effort to hold on to the dramatic gains President Reagan made with Italian-American voters in his 1980 and 1984 New Jersey landslide victories.

Bush campaign officials here say that 1984 exit polls indicated that 23 percent or 437,000 of Reagan's 1.9 million votes in 1984 came from Italian-Americans.

• see BUSH, A6

drugs, about crime and abortion," McGlone said. "I realize that there were 1.6 million abortions in this country last year. That up from 1.5 million a year before."

Though he was once an advocate of family planning and population control programs, Bush has opposed abortion since he joined the Reagan administration. His political rival, Massachusetts Governor Michael Dukakis, supports abortion rights. In many campaign appearances, Bush has declared that he "supports adoption, not abortion."

One of the speakers who introduced Bush yesterday, U.S. Representative Chris Smith, R-Hamilton, said the vice president is "one who will help reinvigorate the values taught in our homes and synagogues, including the most basic value — the value of life."

Bush

of George
area, A3.

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Burg

• continued from A1

"If I could, I'd vote for him," said 11-year-old Chris Crusier, who bicycled from his Ewing Township home to see Bush arrive at the airport under pleasant skies and 50-degree temperatures.

Bush's motorcade of more than a dozen vehicles — including the vice president's official limousine, police and security vehicles, an ambulance and three tour buses for the news media — moved unimpeded from the airport to Trenton. State and local police kept traffic away from the motorcade as it wound down Interstate 95 and Route 29 and into the city.

In Chambersburg, the motorcade pulled off Hamilton Avenue onto South Clinton Avenue about 10 a.m. before turning onto Butler Street, where a throng of anxious Bush-watchers filled the sidewalks along both sides of the street.

As Bush visited the business office of the Italian People's Bakery, 24-year-old Butler Street resident Brad Hanes was staked out on his stoop several doors down with two American flags and a homemade cardboard sign that read: "Bush, crush Dutaxes."

Emerging from the office after a brief visit, Bush shouted to Hanes, "Hey, good sign."

Bush walked several feet to the bakery where he held 3-year-old Anthony John Venanzi, grandson of Italian People's Bakery president John Gervasio, and 1½-year-old Nicholas Korchick of Hamilton Township. He then walked the two blocks along Butler Street to the Roman Hall restaurant and catering hall at 100 Whittaker St.

ALONG THE WAY, he pressed the flesh and signed autographs for the enthusiastic crowd in the style of a spirited campaigner.

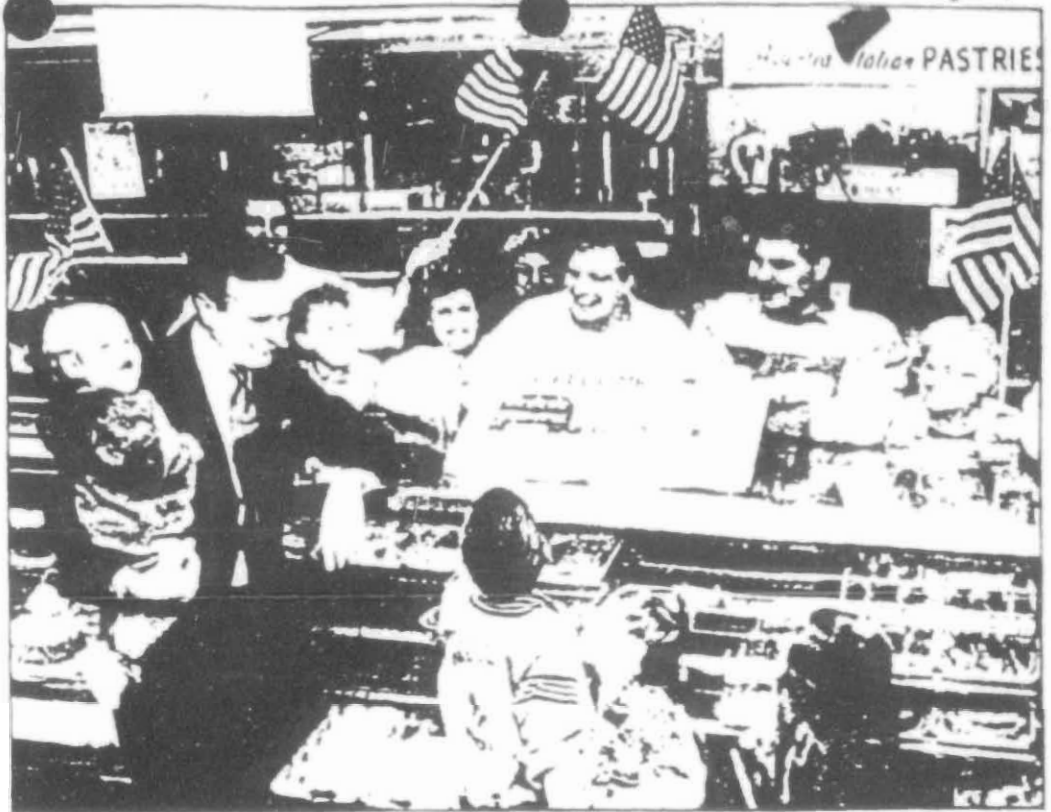
"Shake hands with little Gia," 64-year-old Susan Migliacci beckoned to Bush as he shook her hand in front of her Butler Street rowhouse. Bush complied and smiled a "good morning" to 18-month-old Gia Landolfi.

Migliacci and her neighbors echoed comments heard throughout the morning visit about the 64-year-old vice president's youthful good looks that, many said, must become masked by the ruthless glare of television lights.

Such was Bush's allure that the crowd hardly took note of Kean or the other dignitaries accompanying him.

"Where's Kean?" said Migliacci. "We didn't even see him in the commotion."

Several hecklers called out to Bush, attacking him for his alleged ties to the Iran arms-for-hostages scandal and calling him a



AP photo

Vice President George Bush holds Nicholas Korchick, 1, and reads a sweet message yesterday during his stop at the Italian People's Bakery on his tour of Chambersburg.

drug dealer for his dealings with Gen. Manuel Noriega of Panama.

Bush supporters, meanwhile, returned the verbal fire from across the street, chanting, "Dutaxes, Dutaxes."

AT ROMAN HALL, Bush delivered a speech to a crowd of more than 300 people that targeted the "Italian-American" community and centered on Bush's stated beliefs in "strong families" and what he said is a tough anti-crime stance — two themes that would play well in the Burg.

He stopped briefly at the Kent club after leaving Roman Hall, where, like elsewhere in the Burg, he appeared to leave a lasting impression.

Kent members must now decide what to do with the pool cue and the 4-ball made famous by Bush's "nice, soft" touch. Should it be sent to Washington, in the event of a presidential victory, or should it be hung on a clubhouse wall?

In either case, Bush's aura persists at the social club.

"You shot pool with the president," 80-year-old retiree Joseph Stanzone overstated said to Silvestro, his fellow club member. "Don't forget it."



AP photo

Surrounded by supporters, Vice President George Bush prepares to take a shot yesterday at the Kent Athletic Association in Chambersburg.

Bush⁸⁸Quayle

ISSUE NO. 9

NOVEMBER 3, 1988

With the end of the campaign closing fast, we send this last minute reminder to urge you to rally the troops for the final, 11th hour blitz! If you haven't already done so, please contact your local Bush-Quayle '88 campaign office, the local Victory '88 or the Republican Party to find out what activities they have planned for the final days and how you can help.

There are several activities that you can expect the campaign or the Party to be undertaking in these final days, each of which need our assistance and volunteer manpower: mass mailings, phone banks, literature drops in the neighborhoods, Get-Out-The-Vote. Also, be aware that radio stations will be running special call-in shows on the presidential race. We urge you to call into these programs and voice your support for the Vice President. Also urge your friends and neighbors to call and express their support.

Note to that any literature, articles or information contained in copies of previous weekly mailings may be helpful to circulate to last minute undecided voters, seeking to sway them to support George Bush on election day. Remember, when voters know the facts there's no comparison between the Bush record and the Governor of Massachusetts' mirage.

* * * *

In these last days of the campaign, the Coalition of American Nationalities is please to announce the formation of the Lithuanian Americans for Bush-Quayle '88 and the Arab Americans for Bush-Quayle '88 Committees. The Lithuanian American Committee is co-chaired by Mr. Anatole Milunas, of Downers Grove, IL'inois, and Mr. Casimir Oksas, of Chicago, IL. A flyer

The Arab Americans for Bush-Quayle '88 Committee is chaired by Labor Solicitor George R. Salem, of Springfield, Virginia, and is under the honorary chairmanship of former Oregon Governor Victor Atiyeh. Also named to the Committee as Vice Chairs are: former South Dakota Senator James Abdnor; Michigan GOP Chair Spencer Abraham; Assistant Labor Secretary Michael Barood; Mounzer Chaarani, Hudson Institute President Mitchell E. Daniels, Jr.; Mayor of Hempstead, New York, George Milhim; Mae Moussa; Fuad Sahouri, Chair of the Arab Business Association; Col. Alfred H.M. Shehab, Chairman of the Board of the National Association of Arab Americans; and Dr. Peter Tanous, Former Chairman of the Board of the National Association of Arab Americans.



Anatole Milunas, Barbara Bush, George Bush, Casimir Oksas

State chapters of the Lithuanian-Americans for Bush-Quayle '88 are being formed thruout the U.S. Designations to date of Lithuanians as State Chapter Co-Chairmen are as follows:

- CA - Vytautas Sliupas, Aldona Vasaityte Sehgal, Angele Nelsas
- CT - Alfonsas Dzikas, Zina Dreslius, Linas A. Balsys
- DC - Arunas Pemkus
- FL - Z. John Strasdas, Alicia Solys,
- IL - Joseph Sulaitis, Pranas Jurkus
- IN - Eugene A. Bartkus, Dr. Kazys Ambrozaitis
- MA - Victoras Kubilius, Jonas Vacys, Irena Galinis
- MD - Dr. John B. Genys
- MI - Maryte Petrulis
- NJ - Mark Bablin, Kazys Jankunas
- NY - Romas Kezys, Dr. Marija Zukauskas
- OH - Vladas Pleckaitis, Vytautas Jokubaitis, Irena Kijauskas
- PA - Ausra M. Zerr, S. Algimantas Gecys
- VA - Michael P. Pakstys, Skirma Anna Kondratas
- WS - V. P. Janusonis

Lithuanians for Bush-Quayle '88 lapel buttons have been received and distributed to Federation Chapters and Members-at-Large. Additional buttons are available for a \$1 donation each.

The National Republican Heritage Groups Council convention scheduled for September 23-25, 1988 in Washington, D.C. was cancelled. No date has been set for a rescheduled convention

93043501619

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BEFORE THE FEDERAL ELECTION COMMISSION

City of Alexandria)
)
Commonwealth of Virginia) MUR 2767

AFFIDAVIT OF CECI COLE McINTURFF

CECI COLE McINTURFF, being first duly sworn, deposes and says:

1. I am Ceci Cole McInturff. I served as Director for National Voter Coalitions for Bush-Quayle 88, Inc., the general election campaign committee ("Campaign" or "Committee") of Republican Presidential candidate George Bush and Vice Presidential candidate Dan Quayle. This affidavit will serve to provide additional information requested by the Federal Election Commission in Interrogatories issued on November 27, 1990.

2. The actual list of persons who received the Coalition Handbook included, but was not limited to, the attached National Leadership List. Exhibit 1. In addition, individuals identified to the National Voter Coalitions Office specifically by the state Bush-Quayle 88 headquarters received copies of the Coalition Handbook. The Coalition Handbooks were mailed in September and October, 1988. The Handbooks were printed in Illinois and shipped directly to the individuals on the attached list, among others, as specified above.


93043501621

Finally, during the printing and mailing process, an additional separate legal guidance section was prepared and inserted into the Coalition Handbooks.

The above information is true and correct to the best of my information and belief.


Ceci Cole McInturff

Signed and sworn to before me
this 16th day of January, 1991.


Notary Public

My Commission Expires: 9/1/91

93043501622

93043501623

NATIONAL ETHNIC HONORARY CHAIRMEN

NATIONALITY

NAME/AFFILIATION

Mrs. Anna Chennault
Honorary Chairman
National Voter Groups
(Chairman, National Republican Heritage
Groups Council)
1511 K Street, N.W., Suite 1020
Washington, DC 20005
202/347-0516

Arab

Former Governor Victor Atiyeh
519 S.W. Park #208
Portland, OR 97205
503/222-2244

Armenian

The Honorable George Deukmejian
Governor of California
State Capitol
Sacramento, CA 95814
916/445-2841

Armenian

The Honorable Charles "Chip" Pashayan
Member of Congress (CA-12)
Member, Republican Labor Council
129 Cannon House Office Building
Washington, DC 20515
225-3341

Croatian

The Honorable Michael A. Stepovich
Former Governor of Alaska
P.O. Box 63
Fairbanks, AK 99701
503/773-5949

Croatian

Edward Vrdolyak
Republican candidate for Clerk of the
Circuit Court of Cook County
108 North State Street
Chicago, IL 60602
Attn: Joe Novak
312/902-3548

93043501624

Czech

The Honorable Judy Baar Topinka
State Senator
8609 West Cermak Road
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312/442-0134
217/782-8182

Czech

Ralph Perk
Former Mayor of Cleveland
3421 East 49th Street
Cleveland, OH 44127
216/641-6633 (H)
216/861-5500 (W)

Czech

The Honorable John K. Tabor
Former U.S. Secretary of Commerce
1616 34th Street, N.W.
Washington, DC 20007
202/333-1159

Estonian

K. Jaak Roosaare
Vice President for External Affairs and
General Counsel, Estonian American
National Council
205 Elmwood
Bogota, NJ 07603-1611
201/488-9396 (H)
201/646-2625 (W)
201/646-2274 (W)

Greek

The Honorable Michael Bilirakis (FL-9)
Member of Congress
1530 Longworth House Office Bldg.
Washington, DC 20515
225-5755

Greek

The Honorable George Gekas
Member of Congress (PA-17)
1519 Longworth House Office Bldg.
Washington, DC 20515
225-4315

Greek

William P. Tavoulareas
Retired President and CEO,
Mobil Corporation
171 Harbor Road
Sands Point, NY 11050
212/883-3616

93043501625

Greek

The Honorable Olympia Snowe
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2464 Rayburn House Office Bldg.
Washington, DC 20515
225-6306

Hungarian

Dr. Edward Teller
P.O. Box 808
Lawrence Livermore National Laboratory
Livermore, CA 94550

Irish

The Honorable James O'Grady
Sheriff of Cook County
Richard J. Daley Center
Chicago, IL 60602
312/443-6433

Irish

Ambassador John D.J. Moore
Former U.S. Ambassador to Ireland
W.R. Grace & Co.
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New York, NY 10036
212/819-6274 (W)

Irish

Ambassador Walter J.P. Curley
Former U.S. Ambassador to Ireland
1 Rockefeller Plaza, Suite 1401
New York, NY 10020
212/582-1232 (W)
212/879-0465 (H)

Irish

Tony O'Reilly
President and Chief Executive Officer,
H.J. Heinz Corporation
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Pittsburgh, PA 15230
412/237-5443

Irish

The Honorable Peter H. Dailey
1999 Oak Knoll
San Marino, CA 91108

Irish

The Honorable John Gavin
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213/557-9000

93043501626

Italian

The Honorable Alfonse D'Amato
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520 Hart Building
Washington, DC 20510
224-6542

Italian

The Honorable Ed DiPrete
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Providence, RI 02903
401/277-2080

Italian

The Honorable Dean Gallo
Member of Congress (NJ-11)
1318 Longworth House Office Bldg
Washington, DC 20515
225-5034

Italian

The Honorable Guy Molinari
Member of Congress (NY-14)
208 Cannon House Office Building
Washington, DC 20515
225-3371

Italian

The Honorable Marge Roukema
Member of Congress (NJ-5)
303 Cannon House Office Building
Washington, DC 20515
225-4465

Italian

The Honorable John Volpe
Former Governor of Massachusetts
15 Tudor Road
Nahant, MA 01908
617/596-2732

Italian

The Honorable Michael Traficante
Mayor of Cranston
Cranston, RI

Polish

The Honorable Frank Murkowski
U.S. Senator (Alaska)
709 Hart Building
Washington, DC 20510
224-6665

9304350627

Russian

Yakov Smirnoff
Actor/Comedian
c/o Mr. Robert Williams
Spotlight Enterprises
221 West 57th Street
New York, NY 10019
212/586-6750
(send copy to Mr. Williams)

Russian

Dr. Nina Bouroff
Chairman, Russians for Reagan-Bush '84
4757 Chevy Chase Dr., #A11
Chevy Chase, MD 20815
301/654-0483

Serbian

The Honorable Helen Delich Bentley
Member of Congress (MD-2)
1610 Longworth House Office Building
Washington, DC 20515
225-3061

Serbian

The Honorable George V. Voinovich
Mayor of Cleveland
City Hall
Cleveland, OH 44114
216/664-3534

Slovak

The Honorable Thomas J. Ridge
Member of Congress (PA-21)
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225-5406

Ukrainian

Dr. John Flis
President, Ukrainian National
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P.O. Box 17A
30 Montgomery Street
Jersey City, NJ 07303
201/451-2200

93043507628

NATIONAL ETHNIC CHAIRMEN

NATIONALITY

NAME/AFFILIATION

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Armenian

Barry Zorthian
Former Foreign Service Officer
Col., U.S. Marine Reserves
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630 5th Avenue
New York, NY 10011
212/757-0500

Irish

William Dowling
30 Rockefeller Plaza
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10976 Tanager Trail
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216/566-5096 (W)

93043507630

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NATIONALITY	NAME/AFFILIATION
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German	Russell Angermann Chairman, Germans for Reagan-Bush '84 Angermann & Angermann 501 Unruh Street Philadelphia, PA 19114 215/725-2400 (W) 215/969-5878 (H)
Greek	John Parker, Esq. Chairman, DC Republican Heritage Groups Council 1100 Connecticut Ave., N.W. Washington, DC 20036 202/862-1300 (B) 202/331-1984 (H)
Greek	The Honorable Adeline Geo-Karis State Senator 2600 Sheridan Road Zion, IL 60099 312/623-8811
Greek	Dr. John Skandalakis 4107 Beachwood Drive, N.W. Atlanta, GA 404/727-6238 404/233-3479
Greek	Alec P. Courtelis 1101 Brickell Avenue Miami, FL 33131 305/379-8467

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93043509632

(Lithuanian

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Maj. Gen. USAF Mel Vojredich (Ret.)
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93043501633

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Arab	Michael E. Baroody Assistant Secretary for Policy Department of Labor 200 Constitution Ave., N.W. Room S-2006 Washington, DC 20210 523-6181
Arab	May Moussa 4201 Cathedral Ave., N.W., 1205E Washington, DC 20016 202/363-4962 (H)
Armenian	The Honorable Garabed Haytayan Majority Leader, New Jersey State Assembly P.O. Box 268 Hackettstown, NJ 07840 201/850-8800 201/462-8200 201/852-4901 (H)
Armenian	Col. Harry Sachaklian 6803 Lupine Lane McLean, VA 22101 202/639-5613 (W)
Croatian	Lillian C. Simon National Federation of Croatian American Republican Clubs 23727 E. Newell Circle Farmington Hills, MI 49024 313/963-3206
Croatian	Dr. Nick Grego National Federation of Croatian American Republican Clubs 593 Wigard Avenue Philadelphia, PA 19128 215/483-8666 (W) 215/487-1262 (H)

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Czech

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Irish

The Honorable D. Michael Fisher
State Senator
339 Alamo Drive
Upper St. Clair, PA 15241
412/831-8090 (H)

172 Main Capitol Building
Harrisburg, PA 17120
717/787-5839 (Capitol Building)
412/831-9898 (District)
412/228-2213 (Law Office)

Irish

Dr. Professor John McCarthy
(Out of country until September)
Fordham University
Lincoln Center Campus
113 West 60th St., Room 916 721E
Bronx, NY 10023
212/841-5100

71 Y

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Irish

The Honorable John D. Dunne
State Senator
109 5th Street
Garden City, NY 11530
516/747-7771

550 Stewart Ave.
Garden City, NY 11530
516/222-0068 (District office)

Room 505, Capital
Albany, NY 12247
518/455-2831 (Albany office)

Irish

Commissioner Diane McGrath
New York State Crime Victims Board
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New York, NY 10007
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212/879-9478 (H)

Italian

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301/744-1973 (H)

Polish

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Polish

Dr. George Lerski
Vice President, Polish American Congress
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San Francisco, CA 94121
415/386-1815

Polish

Stanley Glod
Chairman, Foreign Claims Settlement Commission
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Russian

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703/960-7195 (H)

Ukrainian

James Ustynowski
President and CEO, Ridgewood
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Pennsylvania State Rep. 1970-76
710 West Diamond Avenue
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Ukrainian

Mary Dushnyk
(Active in Ukrainian NY Republicans and
Republican Women)
2 Marine Avenue
Brooklyn, NY 11209
718/745-3150

Ukrainian

Nadia McConnell
(Active in Republican activities; former
member of Reagan Administration)
2745 N. Radford Road
Arlington, VA 22207
703/522-9282

23043501637

J. N. PARKER

1100 CONNECTICUT AVENUE, N.W., WASHINGTON, D.C. 20036-4101

January 18, 1991

BY FAX

Mr. Jim Brown
Federal Election Commission
999 E Street, N.W.
Room 657
Washington, D.C. 20463

Re: MUR 2767
Greek Americans for Bush
William G. Chirgotis

Dear Mr. Brown:

It is respectfully requested that an extension in the above-entitled matter be granted for the following reasons:

Disabling illness keeps me house-confined. Medical prognosis would indicate disability until January 29. Response will be filed by January 31, 1991.

Additionally, Middle East crisis has interfered with normal routine and complicates matters.

Thanking you in anticipation, I am

Sincerely,

(dictated but not signed)
John N. Parker

93043501638

CGC-9906

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

January 23, 1991

WRITER'S DIRECT DIAL NUMBER

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

(202) 429-7301

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attn: Jim Brown

Re: MUR 2767

Dear Mr. Noble:

Enclosed please find a signed and notarized copy of the Response of Bush-Quayle 88 to the Interrogatories of the Federal Election Commission in MUR 2767. This will replace the signed copy of this document submitted on January 17, 1991.

Sincerely,

Carol A. Laham

Carol A. Laham

Enclosures

cc: J. Stanley Huckaby

RECEIVED
FEDERAL ELECTION COMMISSION
91 JAN 23 PM 4:36

93043501639

RESPONSE OF BUSH-QUAYLE 88 TO THE
INTERROGATORIES OF THE FEDERAL ELECTION COMMISSION
IN MUR 2767

QUESTION 1

Identify all ethnic newspapers referenced in your July 24, 1989 response to Interrogatory No. 3 in which the National Voter Coalitions ("NVC") paid for the placement of advertisements urging readers to vote for George Bush.

- (a) Provide the dates each advertisement was placed and the costs incurred per advertisement.
- (b) Produce copies of all such advertisements and invoices related thereto.

RESPONSE

As stated by Mark Holman in his Affidavit Before The Federal Election Commission, dated January 11, 1991 (hereinafter "Holman Aff.").

The National Voter Coalitions placed advertisements in each of twenty-five different ethnic newspapers. The list of these newspapers is as follows:

Dziennik Zwiazkowy (Polish)
Fra Noi (Italian)
Italian Tribune News (Italian)
Post Eagle (Polish)
Szabadsag/Nepszava (Hungarian)
American Home (Slovenian)
Il Progresso (Italian)
Nowy Dziennik (Polish)
Svoboda (Ukrainian)
Armenian Reporter (Armenian)
Armenian Life Weekly (Armenian)
Armenian Observer (Armenian)
Nor Gyank (Armenian)
Armenian Mirror-Spectator (Armenian)
Asbarez (Armenian)
Italian Times (Italian)
South Philadelphia American (Italian)
Sons of Italy Times (Italian)
Relax (Polish)

Gwiazda Ploarna (Polish)
Panorama (Polish)
Polish American World (Polish)
Polish American Journal (Polish)
Straz (Polish)
Polish Daily News (Polish)

These advertisements were all to run toward the end of October or the beginning of November, depending upon the newspaper's publication schedule. One captioned "George Bush Shares The Values Of Ethnic Americans;" one captioned "George Bush Shares The Values Of Polish Americans;" and one captioned "George Bush Shares The Values Of Italian Americans." . . . attached at Exhibit 1 are copies of each advertisement sent to the National Voter Coalitions Office by George Bush's supporters. These include a copy of each of the three versions of the advertisement.

The dates the advertisements were placed or appeared and their costs are as indicated on the attached invoices at Exhibit 1. Bush-Quayle 88 has been unable to locate invoices for the following newspapers identified above: Post Eagle; Italian Times; and Gwiazda Ploarna.

QUESTION 2

Identify all "editorials" referenced in our July 24, 1989 discovery response to Interrogatory No. 3 which the NVC sent to ethnic newspapers for voluntary publication.

- (a) Provide the dates each editorial was sent and the costs incurred.
- (b) Produce copies of all such editorials and invoices related thereto.

RESPONSE

The National Voter Coalitions Office intended to distribute between three and five editorials for voluntary publication by the ethnic newspapers receiving copies of the editorials. Two such

editorials entitled "Anniversary of Evil -- Reminder of Freedom's Price," and "Our Values Make America Great" were distributed on October 10, 1988. Three other editorials were distributed on October 25, 1988. These were entitled "The Unraveling of America"; "Massachusetts Miracle . . . Or Mirage"; and "The Reagan-Bush Record: Peace, Pride And Prosperity." There were no identifiable costs associated with any of these editorials other than the cost of postage which would have been de minimus, and not separately recorded. Copies of these editorials are attached at Exhibit 2.

Holman Aff. at ¶3.

QUESTION 3

Produce copies of all "weekly mailings" issued to national coalition leaders and referenced in your July 24, 1989 response to Interrogatory No. 3.

RESPONSE

These are attached as Exhibit 3 to the Holman Affidavit.

QUESTION 4

Your July 24th response and the Mark Holman affidavit indicate that Charles Zogby was responsible primarily for drafting of all the NVC's weekly informational mailings. Identify all other individuals involved in drafting or revising of such weekly mailings prior to their distribution. Provide copies of all such weekly informational mailings.

RESPONSE

As stated by Mark Holman, "I reviewed and revised all such mailings and was the only other individual in the National Voter Coalitions office to do so." Holman Aff. at ¶ 3.

93043501642

QUESTION 5

Provide a copy of the "Coalition Handbook" referenced in your July 24, 1989 Response at page 5.

- a. Identify all persons who received the Coalition Handbook and provide the dates and Handbook was distributed.
- b. Describe the method(s) the NVC used to ensure that volunteers got a copy of the handbook.

RESPONSE

As stated by Ceci Cole McInturff in her Affidavit Before the Federal Election Commission, dated January 16, 1991, at

¶ 2:

The actual list of persons who received the Coalition Handbook included, but was not limited to, the attached National Leadership List. Exhibit 1. In addition, individuals identified to the National Voter Coalitions Office specifically by the state Bush-Quayle 88 headquarters received copies of the Coalition Handbook. The Coalition Handbooks were mailed in September and continued October, 1988. The Handbooks were printed in Illinois and shipped directly to the individuals on the attached list, among others, as specified above.

Finally, during the printing and mailing process, an additional separate legal guidance section was prepared and inserted into the Coalition Handbooks.


We have searched our files and come across a legal memorandum which we believe was inserted in the Handbooks. A copy is attached at Exhibit 2. However, we have not been able to locate any final version of the Handbook itself.

93043501643

The above information is true and correct to the best of my information and belief.


Stan Huckaby

Signed and sworn to before me
this 23 day of January, 1991


Notary Public
My Commission Expires: 5/31/93

93043501644

J. N. PARKER

1100 CONNECTICUT AVENUE, N.W., WASHINGTON, D.C. 20036-4101

January 18, 1991

BY FAX

Mr. Jim Brown
Federal Election Commission
999 E Street, N.W.
Room 657
Washington, D.C. 20463

Re: MUR 2767
Greek Americans for Bush
William G. Chirgotis

Dear Mr. Brown:

It is respectfully requested that an extension in the above-entitled matter be granted for the following reasons:

Disabling illness keeps me house-confined. Medical prognosis would indicate disability until January 29. Response will be filed by January 31, 1991.

Additionally, Middle East crisis has interfered with normal routine and complicates matters.

Thanking you in anticipation, I am

Sincerely,

(dictated but not signed)
John N. Parker

93043501645



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

91 JAN 28 PM 4:30

SENSITIVE

January 28, 1991

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

BY: Lois G. Lerner *g2*
Associate General Counsel

SUBJECT: MUR 2767
Request for Further Extension of Time

By letter dated January 18, 1991, counsel for the Greek Americans for Bush and William G. Chirgotis, as Chairman, requested a further extension of 13 days in which to respond to the Commission's most recent findings in this matter. (Attachment 1). The letter explains that an extension is necessary because counsel is suffering from a "disabling illness," and because of the disruption to the normal routine due to the Middle East crisis.

This Office notes that this is the third request for an extension of time to respond to the Commission's findings as regards these respondents. In a letter dated December 6, 1990, counsel's assistant requested an extension due to counsel's absence from the country over the entire reply period. In response, the Office of the General Counsel granted an extension until January 8, 1991. In a letter dated January 3, 1991, counsel's assistant requested a second extension until January 18, 1991, again citing counsel's absence from the city. At this point the Office of the General Counsel granted the maximum extension, and notified counsel that his response would be due on January 18, 1991.

Because of the time necessary for this Office to process this third request, for the Commission to act on it, and then for counsel to receive notification of the Commission's action, counsel will effectively get his requested extension of time whether or not the Commission grants or denies it.

Therefore, the Office of the General Counsel recommends that the Commission grant the requested extension. However, we also recommend that the Commission approve an appropriate letter informing counsel that no further extensions of time will be granted, and that if there is no response filed by

93043501646

January 31, 1991, the Commission will nonetheless proceed with the matter, and may not consider any subsequently filed document until the next stage of the enforcement process.

RECOMMENDATIONS

1. Grant an extension of 13 days to Greek Americans for Bush and William G. Chirgotis, as Chairman.
2. Approve the appropriate letter

Attachments

1. Request for Extension

93043501647

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2767
Greek Americans for Bush and)
William G. Chirgotis, as)
Chairman.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 31, 1991, the Commission decided by a vote of 4-0 to take the following actions in MUR 2767:

1. Grant an extension of 13 days to Greek Americans for Bush and William G. Chirgotis, as Chairman.
2. Approve the appropriate letter, as recommended in the General Counsel's Memorandum dated January 28, 1991.

Commissioners Aikens, Elliott, Josefiak and McGarry voted affirmatively for the decision; Commissioners McDonald and Thomas did not cast a votes.

Attest:

Jan 31, 1991
Date

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

Received in the Secretariat: Monday, Jan. 28, 1991 4:30 p.m.
Circulated to the Commission: Tuesday, Jan. 28, 1991 11:00 a.m.
Deadline for vote: Thursday, Jan. 31, 1991 11:00 a.m.

93043501648

J. N. PARKER

1100 CONNECTICUT AVENUE, N.W., WASHINGTON, D.C. 20038-4101

BY FAX

January 30, 1991

Jim Brown, Esquire
Federal Election Commission
999 E Street, N.W.
Room 657
Washington, D.C. 20463

Re: MUR 2767
Greek Americans for Bush
William G. Chirgotis

Dear Mr. Brown:

Confirming our telephone conversation of this date, I must respectfully ask for a continuance of this matter until March 4, 1991.

My request is predicated on personal unusual events that preclude me from giving this matter my full and undivided attention. As you know, I am employed by Mobil Oil Corporation with responsibilities overseas and especially in the Middle East operation. It is necessary that I travel to the Middle East at a moment's notice so to speak thereby prohibiting me from meeting filing dates and making appearances.

Mr. William G. Chirgotis sustained a very serious hip fracture that disabled him for almost a year. He is presently in Nassau and is expected to return to his home in New Jersey on or about February 3rd.

I am certain he will want to file a sworn affidavit in this matter but certainly I am obligated to give him the opportunity to engage counsel who can adequately represent him in these proceedings.

Thanking you for your understanding and please present my request to the Commission.

Sincerely yours,


John N. Parker, Esq.

J. N. PARKER

66-9978
RECEIVED
FEDERAL ELECTION COMMISSION
MAN ROOM

1100 CONNECTICUT AVENUE, N.W., WASHINGTON, D.C. 20036-A101

STP-1 AM 11:48

BY FAX

January 30, 1991

Jim Brown, Esquire
Federal Election Commission
999 E Street, N.W.
Room 657
Washington, D.C. 20463

Re: MUR 2767
Greek Americans for Bush
William G. Chirgotis

Dear Mr. Brown:

Confirming our telephone conversation of this date, I must respectfully ask for a continuance of this matter until March 4, 1991.

My request is predicated on personal unusual events that preclude me from giving this matter my full and undivided attention. As you know, I am employed by Mobil Oil Corporation with responsibilities overseas and especially in the Middle East operation. It is necessary that I travel to the Middle East at a moment's notice so to speak thereby prohibiting me from meeting filing dates and making appearances.

Mr. William G. Chirgotis sustained a very serious hip fracture that disabled him for almost a year. He is presently in Nassau and is expected to return to his home in New Jersey on or about February 3rd.

I am certain he will want to file a sworn affidavit in this matter but certainly I am obligated to give him the opportunity to engage counsel who can adequately represent him in these proceedings.

Thanking you for your understanding and please present my request to the Commission.

Sincerely yours,


John N. Parker, Esq.

93043501650



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
91 FEB -5 AM 10:18

SENSITIVE

February 5, 1991

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

BY: Lois G. Lerner *XL*
Associate General Counsel

SUBJECT: MUR 2767
Request for Further Extension of Time

93043501651

In a letter dated November 27, 1990, the Commission notified Greek Americans for Bush, its treasurer ("GAB"), and William G. Chirgotis, that there is reason to believe that each violated 2 U.S.C. §§ 441a(a)(1)(A) and 441d(a). On December 6, 1990, counsel's assistant requested an extension on behalf of these respondents due to counsel's absence from the country over the entire reply period. In response, the Office of the General Counsel granted an extension until January 8, 1991. In a letter dated January 3, 1991, counsel's assistant requested a second extension until January 18, 1991, again citing counsel's absence from the city. At this point the Office of the General Counsel granted the maximum extension, and notified counsel that his response would be due on January 18, 1991. On January 18, 1991, counsel's assistant again contacted staff of this Office and informed them that counsel would be unable to meet that deadline due to illness and complications arising from the Middle East crisis, and therefore requested an extension until January 31, 1991. The Commission approved that request pursuant to this Office's recommendations.

Finally, this Office was contacted on January 30, 1991, by counsel himself. Counsel again requested an extension and forwarded an explanatory letter. See Attachment I. The latest correspondence elaborates on the difficulties associated with counsel's filing of a response in this matter. As a result of Counsel's involvement with Mobil Oil Corporation's Middle East operations, he is preoccupied with the Persian Gulf crisis and is subject to travel on short notice. Furthermore, Mr. Chirgotis is out of the country recuperating from a serious accident.

In discussions with staff of this Office, counsel has indicated that he may be forced to withdraw from this matter if not given an extension until March 4, 1991. This Office notes that this is the fourth request for an extension of time to respond to the Commission's findings as regards these respondents. In none of the earlier correspondences did counsel's assistant indicate the magnitude of counsel's problem in meeting the Commission's response deadlines.

This Office feels that granting an extension until March 4, 1991, would unduly prolong the investigation in this matter and be excessive and unjustified given the subject matter. Therefore, the Office of the General Counsel recommends that the Commission deny the requested time extension until March 4, 1991, for the reasons stated above, and instead grant an extension of 20 days, making the response due on February 20, 1991. This is more than sufficient time for present counsel to respond, or for the respondents in this matter to retain new counsel.

This Office also recommends that the Commission approve an appropriate letter informing counsel that no further extensions of time will be granted, and that if there is no response filed by February 20, 1991, the Commission will nonetheless proceed with the matter, and may not consider any subsequently filed document until the next stage of the enforcement process.

RECOMMENDATIONS

1. Deny the requested time extension of Greek Americans for Bush and William G. Chirgotis, as Chairman, and instead approve a time extension of 20 days until February 20, 1991.

2. Approve the appropriate letter.

Attachments

1. January 30, 1991 Request for Extension

93043501652



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *CW*
DATE: February 5, 1991
SUBJECT: MUR 2767 - Memorandum to the Commission

The attached is submitted as an agenda document
for the Commission Meeting of: _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote [XX]
Sensitive [XX]
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information []
Sensitive []
Non-Sensitive []

Extension of Time
Exception [XX]

Other []

DISTRIBUTION

Compliance [XX]

Audit Matters []

Litigation []

Closed MUR Letters []

Status Sheets []

Advisory Opinions []

Other (see distribution
below) []

93043501653

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2767
Greek Americans for Bush)
and William G. Chirgotis,)
as Chairman - Request for)
Further Extension of Time.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 7, 1991, the Commission decided by a vote of 4-0 to take the following actions in MUR 2767:

1. Deny the requested time extension of Greek Americans for Bush and William G. Chirgotis, as Chairman, and instead approve a time extension of 20 days until February 20, 1991.
2. Approve the appropriate letter, as recommended in the General Counsel's Memorandum dated February 5, 1991.

Commissioners Aikens, Elliott, Josefiak and McGarry voted affirmatively for the decision; Commissioners McDonald and Thomas did not cast votes.

Attest:

2/7/91
Date

Hilda Arnold
for Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tues., February 5, 1991 10:18 a.m.
Circulated to the Commission: Tues., February 5, 1991 4:00 p.m.
Deadline for vote: Thurs., February 7, 1991 4:00 p.m.

93043501654



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 19, 1991

John Nicholas Parker
1100 Connecticut Avenue, N.W.
Washington, D.C. 20036

RE: MUR 2767
Greek Americans for Bush
William G. Chirgotis

Dear Mr. Parker:

This is in response to your letter dated January 30, 1991, which we received on that day, requesting an extension until March 4, 1991, to respond to the Commission's findings in the above matter.


Considering the Federal Election Commission's responsibilities to act expeditiously in the conduct of investigations, the Commission cannot grant your full request, but can only agree to an extension until February 20, 1991. Accordingly, your response is due by the close of business on February 20, 1991.

We note that this is your fourth requested extension of time to respond in this matter. The Commission will not grant any further extensions. If a response is not received by February 20, 1991, the Office of the General Counsel will proceed to the next stage of the enforcement process.

If you have any questions, please contact Jim Brown, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel


BY: Lois G. Lerner
Associate General Counsel

93043501655

066 0120
J. N. PARKER

1100 CONNECTICUT AVENUE, N.W., WASHINGTON, D.C. 20036-4101

Telephone: 202-862-1318

February 20, 1991

91 FEB 20 PM 3:35

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Jim Brown, Esquire
Federal Election Commission
999 E Street, N.W.
Room 657
Washington, D.C. 20463

Re: MUR 2767
Greek Americans for Bush

Dear Mr. Brown:

I enclose for your information William G. Chirgotis's affidavit which requires his acknowledgment before a Notary Public in New Jersey. I anticipate receiving the original affidavit on February 21st, which I will file with you.

In keeping with the February 20th filing date, I am forwarding you today this document.

Accordingly, I plan to file the balance of my petition on February 21st. Have tried to reach you today to get a copy of 11 C.F.R. Section 111.18(d). Would appreciate your sending the C.F.R to me by FAX at 202-862-1352.

With regards, I remain

Sincerely,

John N. Parker, Esquire

93043501656

FEDERAL ELECTION COMMISSION

Greek Americans for Bush and
William Chirgotis, as chairman

MUR 2767

AFFIDAVIT OF WILLIAM G. CHIRGOTIS

Now comes affiant Willlliam Chirgotis first being duly sworn, deposes and says that he was appointed chairman of the Greek Americans for Bush-Quayle 88 Committee; that this committee was also integrated at various times and referred to at various times as the Greek Nationalities. Affiant proceeded to organize the committee by appointing prominent Greek Americans as national co-chairmen. Affiant further states that Charles Zogby was his principle advisor and contact at the Bush-Quayle Presidential Committee.

At all times your affiant was under the express understanding that his efforts were approved by the Presidential Committee and Mr. Charles Zogby of the National Voter Coalitions. Solicitations for advertisements that would appear in Greek American newspapers and one periodical were made by your affiant on stationery furnished by the said Charles Zogby on or about October 12, 1988.

Affiant opened a checking account under the name Greek Americans for Bush-Quayle with an initial deposit by the affiant of \$1,000 and received through solicitation of personal friends an additional sum of \$5,425.00.

Affiant at all times kept Zogby informed of his activities as well as Jan W. Baran, Esq., General Counsel, Bush-Quayle 88.

Your affiant on November 21, 1988 sent his final report to Trevor Potter, Esq., of Wiley, Rein & Fielding outlining his

93043501657

activities, who on December 2, 1988 was informed by Mr. Potter that affiant's activities were not authorized by Bush-Quayle 88 and in fact are the subject of an FEC complaint.

Affiant has no recollection of receiving the October 12, 1988 memorandum from Ceci Cole McInturff, Director for National Voter Coalitions relating to fundraising efforts by coalition members and certainly would not intentionally have engaged in an activity that was prohibited.

Affiant's first knowledge of any alleged violation was the receipt of FEC complaint MUR 2767 which was forwarded to affiant by Jan W. Baran, Esq., General Counsel, Bush-Quayle by his letter dated November 14, 1988.

Affiant further restates that at all times he acted under the assumption that these activities were approved and endorsed by the aforesaid Charles Zogby, a Presidential Committee Campaign official.

Predicated on the aforesaid and reiterating affiant's belief that his activities were proper, affiant has reason to believe there was in fact overexpenditure for the advertisements in question.

Affiant reiterates that all of his activities were conducted in a manner consistent with a lifetime of exemplary integrity and an impeccable reputation both professionally and personally that is zealously cherished.

Further affiant sayeth not.

William G. Chirgotis

93043501658

Personally appeared before me, _____,
a Notary Public in the State of New Jersey, County of _____.

93043501659

J. N. PARKER

1100 CONNECTICUT AVENUE, N.W., WASHINGTON, D.C. 20036-4101

Telephone: 862-1318

February 21, 1991

Jim Brown, Esquire
Federal Election Commission
999 E Street, N.W.
Room 657
Washington, D.C. 20463

Re: MUR 2767
Greek Americans for Bush

91 FEB 22 PM 3:31

RECEIVED
FEDERAL ELECTION COMMISSION
FEB 22 1991

Dear Mr. Brown:

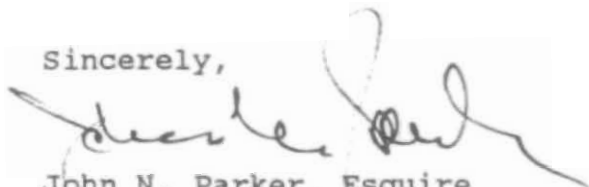
Pursuant to our telephone conversation of Wednesday afternoon, February 20, 1991, I now enclose the executed and acknowledged affidavit of William G. Chirgotis in this matter. On February 20, I filed an unsigned copy of the affidavit of Mr. Chirgotis. I would hope the respondent's affidavit coupled with his interrogatories, the depositions of the respondent heretofore taken and exhibits filed would be sufficient to preclude any further action taken against my client.

In the alternative, I would request consideration be given to pre-probable cause conciliation of this matter as provided for in 11 C.F.R. Section 111.18(d).

I await your further action and advice in this matter.

Regards,

Sincerely,



John N. Parker, Esquire

93043501660

FEDERAL ELECTION COMMISSION

Greek Americans for Bush and
William Chirgotis, as chairman

MUR 2767

AFFIDAVIT OF WILLIAM G. CHIRGOTIS

Now comes affiant Willlliam Chirgotis first being duly sworn, deposes and says that he was appointed chairman of the Greek Americans for Bush-Quayle 88 Committee; that this committee was also integrated at various times and referred to at various times as the Greek Nationalities. Affiant proceeded to organize the committee by appointing prominent Greek Americans as national co-chairmen. Affiant further states that Charles Zogby was his principle advisor and contact at the Bush-Quayle Presidential Committee.

At all times your affiant was under the express understanding that his efforts were approved by the Presidential Committee and Mr. Charles Zogby of the National Voter Coalitions. Solicitations for advertisements that would appear in Greek American newspapers and one periodical were made by your affiant on stationery furnished by the said Charles Zogby on or about October 12, 1988.

Affiant opened a checking account under the name Greek Americans for Bush-Quayle with an initial deposit by the affiant of \$1,000 and received through solicitation of personal friends an additional sum of \$5,425.00.

Affiant at all times kept Zogby informed of his activities as well as Jan W. Baran, Esq., General Counsel, Bush-Quayle 88.

Your affiant on November 21, 1988 sent his final report to Trevor Potter, Esq., of Wiley, Rein & Fielding outlining his

93043501661

93043501662

activities, who on December 2, 1988 was informed by Mr. Potter that affiant's activities were not authorized by Bush-Quayle 88 and in fact are the subject of an FEC complaint.

Affiant has no recollection of receiving the October 12, 1988 memorandum from Ceci Cole McInturff, Director for National Voter Coalitions relating to fundraising efforts by coalition members and certainly would not intentionally have engaged in an activity that was prohibited.

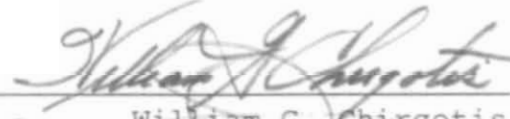
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Affiant further restates that at all times he acted under the assumption that these activities were approved and endorsed by the aforesaid Charles Zogby, a Presidential Committee Campaign official.

Predicated on the aforesaid and reiterating affiant's belief that his activities were proper, affiant has reason to believe there was in fact overexpenditure for the advertisements in question.

Affiant reiterates that all of his activities were conducted in a manner consistent with a lifetime of exemplary integrity and an impeccable reputation both professionally and personally that is zealously cherished.

Further affiant sayeth not.


William G. Chirgotis

Personally appeared before me, William G. Chirgotis,
a Notary Public in the State of New Jersey, County of Union.

Helen M. Rhodes

HELEN M. RHODES

NOTARY PUBLIC OF NEW JERSEY

My Commission Expires April 20, 1992

93043501663

6CC#1005

LAW OFFICE OF
RICHARD MAYBERRY & ASSOCIATES
FIFTH FLOOR
888 16TH STREET, N.W.
WASHINGTON, D.C. 20006
(202) 785-6677

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
91 MAY -3 AM 10:57

May 2, 1991

Lawrence Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: MUR 2767 -- Substitution of Counsel

Dear Mr. Noble:

I withdraw as counsel in the above-mentioned matter. Messrs. William Farah and Edward Knight, of Aiken, Gump, Strauss, Hauer & Feld, 1333 New Hampshire Avenue, NW, Suite 400, Washington, DC 20036, telephone (202) 887-4000, will serve as counsel. All correspondence should be directed to them.

Very truly yours,

Richard Mayberry
Richard Mayberry

RM:cgk

91 MAY -3 PM 3:23

RECEIVED
FEDERAL ELECTION COMMISSION
COUNSEL

93043501664

OGC 1358

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

WILEY, REIN & FIELDING

91 MAY 30 AM 9:35

1775 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

May 28, 1991

JAN WITOLD BARAN
(202) 429-7330

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attn: Jim Brown, Esq.

Re: MUR 2767 (George Bush for President, Inc.
and Stan Huckaby, as Treasurer)

Dear Mr. Noble:

This office represents George Bush for President, Inc. and Stan Huckaby, as Treasurer ("Respondents") in Matter Under Review ("MUR") 2767. An executed Statement of Designation of Counsel form is attached hereto.

On May 20, 1991, Mr. Brown of your office called Respondents to inquire why they had not yet responded to a November, 1990, letter from the Commission in this matter. Respondents stated that they had no knowledge of any such letter, which apparently was lost in the mail. On May 21, 1991, Respondents then received a duplicate copy of Chairman Elliott's letter dated November 27, 1990, notifying them of reason to believe findings against them, and including Interrogatories and Requests for documents.

In order to fully confer with our clients and to obtain whatever information and documentation which may prove necessary, Respondents respectfully request a twenty-day extension of time to and including June 25, 1991, to respond to this matter.

91 MAY 30 AM 10:33

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL

93043501665

Lawrence M. Noble, Esq.
May 28, 1991
Page 2

Your favorable consideration of this request will be appreciated.

Sincerely,



Jan Witold Baran

Enclosure

cc: Stan Huckaby

93043501666

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2767

NAME OF COUNSEL: Jan W. Baran, Esq.
Wiley Rein & Fielding

ADDRESS: 1776 K Street NW

9th Floor


Washington, DC 20006

TELEPHONE: (202) 429-7000

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

5/28/91

Date


Signature

RESPONDENT'S NAME: Stan Huckaby, Treasurer
George Bush for President, Inc.

ADDRESS: 228 S. Washington St., #200

Alexandria, VA 22314

HOME PHONE: (703) 549-7705

BUSINESS PHONE: (703) 549-7705

93043501667



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 5, 1991

Jan Witold Baran
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 2767
George Bush for President, Inc
and Stan Huckaby, as treasurer

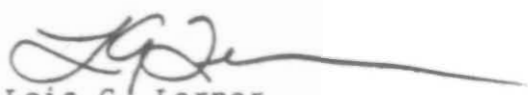
Dear Mr. Baran:

This is in response to your letter dated May 28, 1991, which we received on May 30, 1991, requesting an extension of 20 days until June 25, 1991, to respond to the Commission's findings in the matter cited above. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on June 25, 1991.

If you have any questions, please contact Jim Brown, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

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Arab American
Republican
Federation



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RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 JUN 12 AM 10:44

June 12, 1991

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

91 JUN 12 PM 2:32

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

RE: FEC MUR No. 2767

Dear Madam or Sir:

This is to inform you that, on behalf of the Arab American Republican Federation, I hereby designate Edward S. Knight and William J. Farah of the law firm Akin, Gump, Strauss, Hauer & Feld as counsel in the above-captioned matter in place of Richard Mayberry, who has taken a leave of absence from the practice of law. They are authorized to receive any notification and other communications from and act on its behalf before the Federal Election Commission.

Counsel's address and telephone number are as follows:

1333 New Hampshire Avenue, N.W.
Suite 400
Washington, D.C. 20036
202/887-4000

Sincerely,


Charles Zogby

93043501669

OGC 1680

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

June 25, 1991

JAN WITOLD BARAN
(202) 429-7330

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

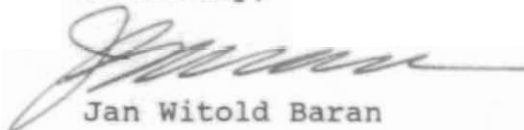
Attn: Jim Brown, Esq.

Re: MUR 2767 (George Bush for President, Inc.
and J. Stanley Huckaby, as Treasurer)

Dear Mr. Noble:

This Response is submitted on behalf of George Bush for President, Inc., and J. Stanley Huckaby, as Treasurer (collectively, the "Committee"), in reply to the Interrogatories and Request for Documents propounded by the Federal Election Commission on November 27, 1990 in Matter Under Review 2767, and received by the Committee on May 21, 1991.

Sincerely,



Jan Witold Baran

Enclosures
cc: J. Stanley Huckaby

91 JUN 25 PM 4:01

RECEIVED
FEDERAL ELECTION COMMISSION
JUN 25 1991
COUNSEL

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RESPONSE OF GEORGE BUSH FOR PRESIDENT TO THE
INTERROGATORIES OF THE FEDERAL ELECTION COMMISSION
IN MUR 2767

QUESTION 1

State when you first learned of the January 4, 1988 letter which was signed by Victor Atiyeh and is attached hereto as Exhibit I.

RESPONSE

I have no recollection of seeing the letter attached to the Commission's Factual and Legal Analysis at Exhibit 1 prior to receiving the Commission's letter on May 21, 1991. Further, the George Bush for President Committee ("Committee") has consulted with Fred Bush, the former Finance Director of the Committee and has been informed that he too has no recollection of seeing the attached letter.

QUESTION 2

Describe the circumstances behind how you learned of the January 4, 1988 mailing and your actions upon learning of its existence.

RESPONSE

Again, I have no recollection of this letter, nor was I aware that there was an problem concerning the letter. Further, Fred Bush has informed the Committee that while ne does recall learning at some point that Mr. Atiyeh was associated with a solicitation of funds for the Committee, he does not recall when he learned this fact, nor does he recall ever having seen the letter. Fred Bush's only recollection

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is of, at some point during the primary campaign, seeing Mr. Atiyeh's name on a piece of stationery enclosing one or more contributions to the Committee. He recognized this name because he knew Mr. Atiyeh to be a former governor of Oregon. Moreover, at this date, 4 1/2 years after the Atiyeh letter was apparently written, Mr. Bush has no personal recollection of how the Committee came to pay for any such letter.

QUESTION 3

Describe the relationship, if any, between George Bush for President, Inc. and the following:

- a. Victor Atiyeh
- b. George Salem
- c. Charles Zogby
- d. Arab Americans for George Bush
- e. The Arab-American Republican Federation
- f. The Arab American Institute

RESPONSE

a. The Committee received a contribution from Victor Atiyeh on January 22, 1988. The Committee has examined its expense and employment records and can find no record of any relationship with Mr. Atiyeh to my knowledge.

b. The Committee has examined its expense and employment records and can find no record of any relationship with George Salem to my knowledge.

c. The Committee has examined its expense and employment records and can find no record of any relationship with Charles Zogby to my knowledge.

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d. The Committee had no relationship with Arab Americans for George Bush to my knowledge.

e. The Committee reimbursed the Arab American Republican Federation for the unauthorized fund-raising mailing which is the subject of this MUR, and otherwise had no relationship with that organization to my knowledge.

f. The Committee had no relationship with the Arab American Institute to my knowledge.

QUESTION 4

Identify all contributions received by George Bush for President, Inc. as a result of the January letter discussed above.

RESPONSE

It is not possible to identify which contributions to the Committee were received as a result of the January letter discussed above. Because the letter was not generated by the campaign, there was no source document attached to the letter which would permit the Committee to research who might have contributed to it as a result of the letter. Further, it was Fred Bush's practice, immediately upon receipt of contributions of whatever size or form, to forward them to the Treasury Division for processing and reporting upon receipt. Accordingly, Mr. Bush kept no personal record of contributors and had no system of recording contributions he

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transmitted to the Treasury Division, including any which might have been received in response to the Atiyeh letter.

QUESTION 5

Described how you determined which contributions were made in response to the January letter.

RESPONSE

As stated above, it is not possible to determine which contributions were received as a result of the January letter.

QUESTION 6

Describe the procedure by which George Bush for President, Inc. obtained contributions resulting from the January letter discussed above.

RESPONSE

This question assumes that contemporaneously with the distribution of the solicitation letter the Committee was aware of its existence. However, this assumption is inaccurate. Rather, it is my understanding that Fred Bush began to receive contributions, at least one of which he recalls to have been enclosed in a piece of stationery identifying Mr. Atiyeh. Upon seeing this, Mr. Bush surmised only that Mr. Atiyeh was raising money for the campaign, not that a letter had been sent by Mr. Atiyeh for this purpose.

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QUESTION 7

Produce all transmittal letters that accompanied contributions resulting from the January letter.

RESPONSE

Again, not knowing who the individual contributors might have been, it is not possible for the Committee to produce the transmittal letters, if any existed. The Committee has retrieved a copy of Mr. Atiyeh's contribution to the campaign and has determined that it was not accompanied by a transmittal letter.

QUESTION 8

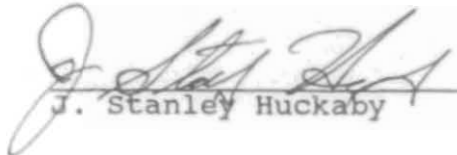
Describe the role Fred Bush played in the campaign's receipt of contributions received as a result of the January letter discussed above.

RESPONSE

Again, this question is premised on the mistaken assumption that the Committee was aware that Mr. Atiyeh had sent a letter in January 1988 when it began to receive contributions. The Committee has conferred with Fred Bush who has no recollection of ever seeing a solicitation letter or knowing that these contributions resulted from such a letter. Rather, as stated above, Mr. Bush recalled receiving some contributions wrapped in stationery with Mr. Atiyeh's name on it. Further, as stated above, Mr. Bush forwarded the

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contributions to the Treasury Division for processing and reporting.


J. Stanley Huckaby

Commonwealth of Virginia }
 } ss.
City of Alexandria }

Signed and sworn to before me this 25 day of June, 1991.


Notary Public

My Commission Expires: 5/31/93

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00-2843

AKIN, GUMP, HAUER & FELD

ATTORNEYS AT LAW

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

1333 NEW HAMPSHIRE AVENUE, N.W.

SUITE 400

WASHINGTON, D.C. 20036

(202) 887-4000

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2100 FRANKLIN PLAZA

111 CONGRESS AVENUE

AUSTIN, TEXAS 78701

(512) 499-6200

1500 NCNB PLAZA

300 CONVENT STREET

SAN ANTONIO, TEXAS 78205

(512) 270-0800

1900 PENNZOIL PLACE - SOUTH TOWER

711 LOUISIANA STREET

HOUSTON, TEXAS 77002

(713) 220-5800

4100 FIRST CITY CENTER
1700 PACIFIC AVENUE
DALLAS, TEXAS 75201-4618
(214) 969-2800

65 AVENUE LOUISE, P.B. NO. 7
1050 BRUSSELS, BELGIUM
(011) 32-2-535.29.11

4135

WRITER'S DIRECT DIAL NUMBER (202) 887-

September 19, 1991

BY MESSENGER

Jim Brown, Esq.
Federal Election Commission
Office of General Counsel
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2767

Dear Mr. Brown:

This letter responds to your request for additional information, made in the course of our telephone conversation on September 10, 1991, with regard to the Arab American Republican Federation's ("AARF") outstanding balance to the Arab American Institute ("AAI") for its pro-rata share of office and related administrative expenses.

As you know, AARF and AAI indicated in their respective responses to the Office of General Counsel's ("OGC") "Factual and Legal Analysis" that AAI billed AARF for office and related administrative expenses and provided a detailed invoice for 1987 and 1988.^{1/}

Specifically, AAI billed AARF \$3,848.45 for 1987 and \$4,567.84 for 1988, resulting in an outstanding balance of \$8,416.29. To date, for the reasons discussed below, this amount remains unpaid. Notwithstanding, this does not undermine the fact that AAI and AARF were separate, distinct entities.

^{1/} This statement was one of several offered to evince the separateness of AAI and AARF. As you may recall, OGC's "Factual and Legal Analysis" concluded that the separateness of AAI and AARF should be disregarded based on observations that (i) the two organizations shared office space, (ii) had one employee who overlapped for a time, (iii) had similar goals, and (iv) that AAI "assisted" AARF.

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OFFICE OF GENERAL COUNSEL
91 SEP 20 AM 10:47

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Jim Brown, Esq.
September 19, 1991
Page 2

AARF was an unincorporated association of local Arab American Republican clubs. It was established to represent these clubs on a national level and to act as their liaison to the National Republican Party. Its funding was derived principally from nominal membership dues paid by member clubs. Importantly, AAI did not contribute or otherwise make any payments to AARF.

At the beginning of 1987, AARF's account balance was merely \$1,687.10. In the course of 1987, its receipts from dues totalled only \$523.36, and it spent \$804.23 on activities and operational expenses. Thus, at the close of 1987, AARF had an account balance of just \$1,365.23. Sensitive to AARF's laudable purpose, its limited resources and interested in seeing AARF succeed in its endeavor, AAI did not press AARF for payment of its bill for office and administrative expenses -- a reasonable and perfectly lawful act under the circumstances.

Similarly, in 1988, AARF raised \$9,637.26, but spent \$8,536.99 for activities and operational expenses, leaving an account balance of only \$2,465.50 at the end of the year. Moreover, on November 7, 1988, the Federal Election Commission ("FEC") notified AARF of this MUR, and on June 1, 1989 determined "reason to believe." This set in motion a need for legal counsel, which in 1989 alone cost AARF approximately \$6,000. Consequently, although AARF raised \$11,251 in 1989, at the year's end it had only \$1,809.51 on hand and faced continued legal expenses.^{2/}

In view of these anticipated additional legal expenses and AARF's limited resources, AARF sought and AAI granted a deferment of its outstanding balance for office and administrative expenses. Once again, this act was perfectly lawful and

^{2/} We note, for example, that AARF has had its treasurer deposed, responded to numerous interrogatories and filed a response with the Commission since this MUR was initiated in 1988. Moreover, twice it has sought pre-probable cause conciliation. Neither request, to date, has been granted. The protracted nature of this MUR's litigation has sapped and continues to sap AARF of resources and undermines the organization's ability to carry on its mission. Indeed, the organization has had only limited activity in the last two years, and at this time has an account balance of just \$409.51.

Jim Brown, Esq.
September 19, 1991
Page 3

completely consistent with the purposes of a nonprofit training institute like AAI, which was established to, inter alia, "provide assistance to other entities where that assistance will have the effect of encouraging greater Arab American political participation." See AAI Response to OGC Factual and Legal Analysis, p.8 (Jan. 14, 1991)

As previously stated in our responses to this MUR, AARF and AAI were separate, distinct entities, and on this point we refer once again to those responses. See AAI's Response to the FEC's Factual and Legal Analysis, pp. 4-8 (Jan. 14, 1991); and AARF's Response to OGC Factual and Legal Analysis, p.3-4 (Dec. 19, 1990)

We hope this information is satisfactory. Should you have any questions, please do not hesitate to call.

Sincerely,

Edward S. Knight

Edward S. Knight
William J. Farah
Counsel

by W.J.F.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2767/2757

DATE FILMED 11-8-93 CAMERA NO. 2

CAMERAMAN JM H

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FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

☒ Microfilm
☐ Public Records
☐ Press

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 2767.

12/10/93

93043542108

**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.

93043542109



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Edward Pliner, Treasurer
Dukakis/Bentsen Committee, Inc.
483 Washington Street
Brookline, MA 02146

RE: MUR 2767

Dear Mr. Pliner:

On November 4, 1988, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

On May 23, 1989, the Commission found reason to believe that the Arab-American Republican Federation violated 2 U.S.C. §§ 433, 434, and 441a(a)(1)(A); that Greek Americans for Bush and its treasurer violated 2 U.S.C. §§ 433 and 434; and that Bush-Quayle '88, Inc. and J. Stanley Huckaby, as treasurer, violated 26 U.S.C. § 9003(b)(2).

On October 4, 1990, the Commission took other actions with respect to this matter. The Commission found reason to believe that the Arab American Institute, Inc. and the Arab-American Republican Federation violated 2 U.S.C. §§ 441b(a) and 441d(a). The Commission also found reason to believe that William G. Chirgotis and the Greek Americans for Bush and its treasurer violated 2 U.S.C. §§ 441a(a)(1)(A) and 441d(a). In addition, the Commission found reason to believe that George Bush for President, Inc., and J. Stanley Huckaby, as treasurer, violated 2 U.S.C. §§ 434(b)(4) and 441b(a).

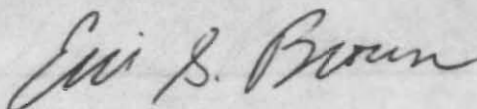
After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against the Arab American Institute, Inc., the Arab-American Republican Federation, William G. Chirgotis, Greek Americans for Bush and its treasurer, Bush-Quayle '88, Inc. and J. Stanley Huckaby, as treasurer, and George Bush for President, Inc., and J. Stanley Huckaby, as treasurer. Accordingly, the Commission closed its file in this matter. This matter will become part of the public record within 30 days.

93043542110

Edward Pliner, Treasurer
Page 2

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,



Eric S. Brown
Paralegal Specialist

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

93043542111



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

DEC 10 1993

J. Stanley Huckaby, Treasurer
George Bush for President, Inc.
228 South Washington Street, Suite 200
Alexandria, VA 22314

RE: MUR 2767
George Bush for President, Inc., and
J. Stanley Huckaby, as treasurer

Dear Mr. Huckaby:

On November 27, 1990, you were notified that the Federal Election Commission had found reason to believe that George Bush for President, Inc., and you, as treasurer, violated 2 U.S.C. §§ 434(b)(4) and 441b(a). On January 17, 1991, your previously designated counsel in this matter submitted a response on behalf of the Committee, and you, as treasurer, to the Commission's findings and discovery requests.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against George Bush for President, Inc., and you, as treasurer. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 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 before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

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

Sincerely,

Eric S. Brown
Paralegal Specialist

Date the Commission voted to close the file:

DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

DEC 10 1993

J. Stanley Huckaby, Treasurer
Bush-Quayle '88, Inc.
228 South Washington Street, Suite 200
Alexandria, VA 22314

RE: MUR 2767
Bush-Quayle '88, Inc. and
J. Stanley Huckaby, as treasurer

Dear Mr. Huckaby:

On June 1, 1989, you were notified that the Federal Election Commission had found reason to believe that Bush-Quayle '88, Inc. (the "Committee") and you, as treasurer, violated 26 U.S.C. § 9003(b)(2). On July 24, 1989, your previously retained counsel in this matter submitted a response to the Commission's reason to believe finding on behalf of the Committee and you, as treasurer.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against Bush-Quayle '88, Inc. and you, as treasurer. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 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 before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

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

Sincerely,

Eric S. Brown
Paralegal Specialist

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

93043542113



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

John N. Parker, Esq.
1100 Connecticut Avenue, N.W.
Washington, DC 20036

RE: MUR 2767
Greek Americans for Bush
William G. Chirgotis

Dear Mr. Parker:

On June 1, 1989, your clients were notified that the Federal Election Commission had found reason to believe that Greek Americans for Bush violated 2 U.S.C. § 433 and 434. On July 27, 1989, you submitted a response to the Commission's reason to believe findings.

On November 27, 1990, your clients were notified that the Federal Election Commission had found reason to believe that Greek Americans for Bush violated 2 U.S.C. §§ 441a(a)(1)(A) and 441d(a) and that William G. Chirgotis personally violated 2 U.S.C. § 441a(a)(1)(A) and 441d(a). On February 21, 1991, you submitted a response to the Commission's reason to believe findings.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against William G. Chirgotis and Greek Americans for Bush. Accordingly, the Commission closed its file in this matter.

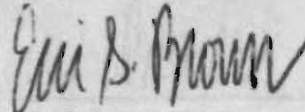
The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any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

93043542114

John N. Parker, Esq.
Page 2

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

Sincerely,



Eric S. Brown
Paralegal Specialist

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

93043542115



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1992

Edward S. Knight, Esq.
William J. Farah, Esq.
Akin, Gump Strauss, Hauer & Feld
1333 New Hampshire Avenue, N.W.
Suite 400
Washington, DC 20036

RE: MUR 2767
Arab American Institute, Inc.
Arab-American Republican Federation

Dear Mr. Knight and Mr. Farah:

Your clients, the Arab-American Republican Federation ("AARF") and the Arab American Institute, Inc. ("AAI"), were previously notified of several determinations made by the Federal Election Commission.

On June 1, 1989, your client, AARF, was notified that the Federal Election Commission had found reason to believe that AARF and its treasurer violated 2 U.S.C. §§ 433(a), 434(a), and 441a(a)(1)(A). On June 28, 1989, a response was submitted on behalf of the Arab-American Republican Federation to the Commission's reason to believe findings.

On November 27, 1990, AARF was notified that the Commission had found reason to believe that they violated 2 U.S.C. §§ 441b(a) and 441d(a). On December 19, 1990, a response was submitted on behalf of AARF to the Commission's findings and discovery requests.

The Commission also took several actions with respect to your client, AAI. On November 27, 1990, AAI was notified that the Commission had found reason to believe that AAI violated 2 U.S.C. § 441b(a) and 441d(a). On January 14, 1991, a response was submitted on behalf of AAI to the Commission's findings and discovery requests.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against the Arab American Institute, Inc. or the Arab-American Republican Federation. Accordingly, the Commission closed its file in this matter.

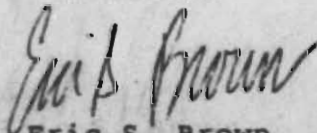
93043542116

Edward S. Knight, Esq.
William J. Farah, Esq.
Page 2

The confidentiality provisions at 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 before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

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

Sincerely,



Eric S. Brown
Paralegal Specialist

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

93043542117