



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20461

THIS IS THE BEGINNING OF MUR # 3685

DATE FILMED 10/29/93 CAMERA NO. 2

CAMERAMAN MC

93040992560

Elaine Middendorf  
3930 Eiler  
St. Louis, MO 63116

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIN COPY ROOM

Nov 2 12 55 PM '92

October 26, 1992

MUR 3685

Federal Election Commission  
Attention: General Counsel Office  
999 E Street, NW  
Washington DC 20463

Dear Sir or Madam:

I wish to register a complaint against THE IDEA CENTER, the organization responsible for the political advertisement which appeared in the October 11, 1992 issue of the St. Louis Post-Dispatch. I have enclosed a copy of the ad.

This ad is clearly in violation of the Federal Election Campaign Act, Reg. 11 CFR, Sec. 110.11, the disclaimer requirement, for the following reasons:

- 1) THE IDEA CENTER is not listed in the St. Louis telephone directory; I had to call the St. Louis Post-Dispatch to find out who these people are, and they advised me that the company is PAUL FLUM IDEAS, INC., 11100 Linpage, St. Louis MO 63132, phone 314/423-9777. No address or individual's name appears on the ad.
  - 2) The ad simply says "a message from THE IDEA CENTER" and not "paid for by" as required by law.
  - 3) Without this sort of research that I did, there is no way the public is truthfully and fully informed as to who sponsored this political advertisement.
  - 4) The ad does not say "authorized by" or "not authorized by" the Clinton-Gore campaign.
- Thank you for your attention to this matter.

Sincerely,

*Elaine L. Middendorf*

Elaine L. Middendorf  
Phone: 314/481-4609

enc

*As of October 26, 1992, Sworn to and  
Notarized. Sworn & signed before me  
James F. Kehlenbrink*

JAMES F. KEHLENBRINK  
NOTARY PUBLIC - STATE OF MISSOURI  
MY COMMISSION EXPIRES JULY 12, 1995  
ST. LOUIS COUNTY

9304092561

92 NOV -2 PM 4:14

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIN COPY ROOM

Political Advertisement

Political Advertisement

Political Advertisement

PRESIDENTIAL  
DEBATE  
ONE

## AMERICA AND THE FUTURE

ST. LOUIS  
OCTOBER 11  
1992

PROTECT OUR FUTURE WITH YOUR VOTE



RESPONSIBILITY

"This nation, under God, shall have a new birth of freedom—and that government of the people, by the people, for the people, shall not perish from the earth."

ABRAHAM LINCOLN

religious strife and hatred like that of Yugoslavia where Serbs, Croats, Muslims, Roman Catholics and Eastern Orthodox Catholics are all destroying one another.

Ironically, most of our forebears came to this country to escape this kind of religious and ethnic intolerance in Europe.

### Our founding fathers, led by Thomas Jefferson, fostered intellectual freedom and the separation of Church and State as the pillars of American Democracy.



TOLERANCE

"I swear before the altar of God, eternal hostility to every form of tyranny over the mind of man."

THOMAS JEFFERSON

children not to live with them—all of which insures that our jails and mental institutions will be kept full and that the quality of our society will be constantly degraded.

He and his administration lack the vision and the drive to create and present a better system to the American public.

### Teddy Roosevelt was America's Trustbuster, Conservationist and Protector of Working Men's Rights against the Malefactors of Great Wealth.

Roosevelt used his Presidency as a "bloody pulpit" to inspire Americans with a vision of the future. Unfortunately, George Bush presents no future plan and fails to inspire the American people with his own convictions. He has not acted with determination or imagination to solve our greatest problems.

The Bush administration has failed to reduce drug trafficking and the use of drugs in our society. White-collar crime has escalated under the selfish example of many unscrupulous supporters of Reagan and Bush (witness Ivan Boesky, Michael Milken, Ross Johnson and Charles Keating). And, sadly, the conservation tradition of Teddy Roosevelt has been sabotaged by the Bush Administration. They are running wild with efforts to waste our natural resources and to despoil our environment.

Also, ignoring the earth's limitations, religious bigots in the Reagan and Bush administrations have stopped American aid to the United Nations for family planning around the world—even though the exploding birthrate and uncontrolled population growth is the biggest problem that the human race now faces. We are on the road to destruction and George Bush is doing nothing but accelerating the pace.

The "puppet masters" who control George Bush are notorious for their lack of intelligence, wisdom, responsibility and respect for the independent quest for knowledge and logical solutions. They are creatures of the Dark Ages and the Inquisition.

The John Sununu, Henry Hyde, Jesse Helms, Orrin Hatch and Phyllis Schlafly, who have been embraced by George Bush, represent the fanatic fringe of the Republican Party. They are a clear and present danger to all Americans who value their heritage of freedom. We must stand up to this challenge now—and the first requirement is to defeat George Bush to show that this un-American behavior will not be tolerated.

Therefore, **VOTE FOR BILL CLINTON FOR PRESIDENT AND AL GORE FOR VICE PRESIDENT**...and for all courageous, thinking Republican candidates who are not captives of the religious fundamentalists. Also, we are recommending that Bill Clinton appoint **ROSS PEROT** to lead a new "DEPARTMENT OF NATIONAL GOALS"—to help reduce our deficit and to keep this country on a clear, correct course into the future.

a message from...

# THE IDEA CENTER.

"Dedicated to building a better world."

St. Louis, Missouri 63132

### Whatever happened to the traditional Republican values of Abraham Lincoln?

The ghost of the Ayatollah Khomeini is riding high over America as George Bush (having been kidnapped and brainwashed by the hard-right, fanatic fringe of the Republican Party) leads their desperate attack on our traditional values by trying to turn our heritage over to the greedy, the selfish, the ignorant and the superstitious.

President Bush, nice person that he is, has become the American Ayatollah—except that he is not operating on his own principles or philosophy which he lacks the vision to possess personally.

### The Torch of Liberty is being extinguished by ignorance and religious bigotry.

George Bush is the mouthpiece and the puppet for the forces of intellectual tyranny, superstition, greed, ignorance and religious bigotry personified by Pat Buchanan, Pat Robertson, Cardinal O'Connor, Charles Keating and Phyllis Schlafly. He is their point man to pervert the basic American principles of freedom, responsibility and justice. His radical-right Republican ringmasters wish to transform our free American society into one of ethnic and



FREEDOM

"Give me your tired, your poor, your huddled masses yearning to breathe free... I lift my lamp beside the golden door."

George Bush, himself, does not come from a bigoted background.

However, he has become captive to the unscrupulous manipulators who use him to espouse their "sacred gospel" of superstition and ignorance because he is a clean-cut American patriot.

This is what makes him so dangerous. He is a decoy for those who would ensnare the citizens who are attracted to him.

Give him your vote and he will use it, in behalf of his cynical handlers, to erode your personal freedom, to enrich special interests at the public expense, to spoil the quality of your environment, and to stack the Supreme Court with atavistic practitioners of alien superstitious beliefs that have no place in America. He will also promote crime by insuring the availability of handguns to any and all criminals with no restrictions.

Your vote for Bush will also encourage his inept domestic advisors to have him continue to funnel billions of your tax dollars to fraudulent welfare recipients who don't work and who use the money for drugs and the free time for crime and corruption. He has done nothing to curtail this insane activity that is destroying our American culture and putting every citizen at risk.

After funneling your money to the least deserving he will also continue the equally insane incentive program that induces irresponsible adolescents to have endless streams of children who get the poorest parenting. He will also continue another incentive program to induce the fathers of these



COURAGE



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 12, 1992

Ms. Elaine L. Middendorf  
3930 Eiler  
St. Louis, MO 63116

RE: MUR 3685

Dear Ms. Middendorf:

This letter acknowledges receipt on November 2, 1992, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by The Idea Center. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3685. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

*Teresa A. Hennessy*

Teresa A. Hennessy  
Assistant General Counsel

Enclosure  
Procedures

93040992563



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

November 12, 1992

The Idea Center  
c/o Paul Flum Ideas, Inc.  
11100 Linpage  
St. Louis, MO 63132

RE: MUR 3685

Dear Mr. Flum:

The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3685. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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

93040992564

The Idea Center  
Paul Flum Ideas, Inc.  
Page 2

If you have any questions, please contact Joi L. Roberson, the staff member assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

*Teresa A. Hennessy*

Teresa A. Hennessy  
Assistant General Counsel

Enclosures

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

93040992565

# PAUL FLUM *ideas* INC.

November 24, 1992

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIN COPY ROOM

DEC 1 11 28 AM '92

## IDEA CENTER

Ms. Teresa H. Hennessy  
Assistant General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Dear Ms. Hennessy:

*MUR 3685*

We are in receipt of your letter dated November 12, 1992 advising me of a complaint received against the article placed in the St. Louis Post-Dispatch on October 11, 1992.

I have talked to Ms. Joi L. Roberson to explain the situation, and she requested that I respond to the complaint from Ms. Elaine Middendorf in writing which I am doing here.

I feel this complaint should be dismissed for the following reasons:

- 1) As a private individual, I have the First Amendment guaranteeing me the right to express my opinions freely.
- 2) This article was not paid for by any political machinery -- but rather, out of my own personal funds.
- 3) My means of doing this is through the medium of "The Idea Center" which is my contribution as a citizen to fulfill my obligation to the country. "The Idea Center" is located at my business address and produces a publication called "America and the Future" which goes to Congressmen, Senators, the White House, etc. and deals with foreign policy, domestic issues, etc., and has been entered into the Library of Congress.
- 4) This article was not involved in any way with any of the election committees for any of the political candidates -- presidential or otherwise.
- 5) I travel throughout the world. I visit our U.S. embassies, interview ambassadors and keep knowledgeable about foreign policy and government in general, and have developed significant correspondence with elected officials and policy makers under "The Idea Center" name. Their correspondence has always reached me with this name and zip code.

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
92DEC-1 PM 4:23

93040992566


November 24, 1992

- 93040992567
- 6) However, I have never run an advertisement with a political message until the first presidential debate in St. Louis. I felt strongly that the message I prepared was an important and necessary one to preserve our basic American freedoms and arranged to run same in the St. Louis Post-Dispatch.
  - 7) "The Idea Center" and "American and the Future" are both registered and trademarked by the U.S. Government as official names of our organization and our publicity.
  - 8) The complainant, Elaine Middendorf, had no difficulty establishing who wrote the article when she called the St. Louis Post-Dispatch. There was no attempt to hide or mask our identity.
  - 9) Since this was my first political ad, I was unaware of any legal requirement. However, I boldly named our organization and the city of St. Louis, MO and zip code, 63132.
  - 10) If this article required the "Political message paid for by...", why didn't the St. Louis Post-Dispatch advise me of this requirement.? We worked closely with them to meet their deadline, and they had ample opportunity to review the material and decide if it required any further modification before printing. I would have been glad to add the required verbiage had I been notified of such.

Based on the above information, I respectfully submit that the complaint be dismissed.

I look forward to receiving your decision at the earliest opportunity.

Very truly yours,

  
Paul Flum  
President

cc: Joi L. Roberson

MUR # 3685

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

93040992568



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20541

THIS IS THE End of MUR# 3685

DATE FILMED 10/29/93 CAMERA NO. 2

CAMERAMAN MC

93040992569



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

☒ Microfilm  
☐ Public Records  
☐ Press

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3685.

12/10/93

23043543517

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.

23043543518



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1992

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Elaine L. Midendorf  
3930 Eiler  
St. Louis, MO 63116

RE: MUR 3685

Dear Ms. Midendorf:

On November 2, 1992, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the Idea Center. See attached narrative. Accordingly, the Commission closed its file in this matter. This matter will become part of the public record within 30 days.

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

Sincerely,

*Joi L. Roberson*

Joi L. Roberson  
Attorney

Attachment  
Narrative

Date the Commission voted to close the file:

DEC 09 1992

23043543519

**MUR 3685**  
**THE IDEA CENTER**

The complainant, Elaine Middendorf, alleged that in 1992 the Idea Center ran an ad supporting Clinton/Gore that lacked a proper disclaimer. The complaint did not specify the extent of distribution of the ad. The respondent stated that his personal funds paid for the ad although he used the Idea Center, located at his business address, as the "medium" for the ad.

This matter has little or no impact on the process, involves no significant issue relative to the other issues pending before the Commission, and involves no substantial amounts of money. Additionally, there is no indication of serious intent by the respondent to violate the FECA.

23043543520



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1992

The Idea Center  
c/o Paul Flum Ideas, Inc.  
11100 Linpage Place  
St. Louis, MO 63132

RE: MUR 3685

Dear Sirs:

On November 12, 1992, the Federal Election Commission notified the Idea Center of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

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

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

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

Sincerely,

*Joi L. Roberson*  
Joi L. Roberson  
Attorney

Attachment  
Narrative

Date the Commission voted to close the file:

DEC 08 1992

23043543521

MUR 3685  
THE IDEA CENTER

The complainant, Elaine Middendorf, alleged that in 1992 the Idea Center ran an ad supporting Clinton/Gore that lacked a proper disclaimer. The complaint did not specify the extent of distribution of the ad. The respondent stated that his personal funds paid for the ad although he used the Idea Center, located at his business address, as the "medium" for the ad.

This matter has little or no impact on the process, involves no significant issue relative to the other issues pending before the Commission, and involves no substantial amounts of money. Additionally, there is no indication of serious intent by the respondent to violate the FECA.

23043543522