



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4227

DATE FILMED 10-9-96 CAMERA NO. 2

CAMERAMAN JmW

96048745207



Independent Republicans of Minnesota

480 Cedar Street, Suite 560
Saint Paul, Minnesota 55104

(612) 222-0022
(612) 224-4122 (fax)

February 28, 1994

Federal Election Commission
Office of the General Counsel
999 E Street
Washington, DC 20463

Dear Sirs:

We write to file a formal complaint against the Wellstone for Senate Committee (FEC identification number C00237180) and United States Senator Paul Wellstone concerning (1) their deliberate and improper overstatement of the campaign's 1990 primary election debt for the purpose of knowingly circumventing Federal election law contribution limits, (2) their acceptance of certain contributions over legal limits, and (3) their illegal redesignation of 1990 General Election contributions towards the Primary Election.

Below we detail the facts involved in this matter, and we have attached copies of the relevant sections from these Wellstone for Senate FEC reports:

- **Exhibit A:** Summary page of October 15, 1990, quarterly report (original version);
- **Exhibit B:** Summary page of October 15, 1990, quarterly report (amended version of May 18, 1991); and
- **Exhibit C:** Summary page and select pages from Schedule A of General Election, October 18-November 26, 1990, report (filed December 5, 1990).

The Wellstone for Senate Committee (hereinafter "committee") originally reported its "net debts outstanding" as defined in 11 CFR §110.1(b)(3)(ii) for the Primary Election as \$8,559.42 (Exhibit A: October 15, 1990). Clearly, any additional debts incurred by the committee after the Primary were to be applied to the General Election.

However, after the Primary, the committee systematically engaged in the acceptance of contributions for the Primary debt which (1) were **illegally redesignated back to the Primary** and (2) **totaled far more than the committee's net debts outstanding**. Under 11 CFR §110.1(b)(4), any contribution received after the Primary Election which is to be attributed to the Primary campaign must be redesignated by the contributor for that purpose in writing within sixty days of receipt. Since no such documentation was attached to the committee's reports, it is evident that the

committee itself -- not its contributors individually -- redesignated those monies for the Primary.

Additionally, the committee accepted four **contributions in excess of the individual legal limits** (numbers 3, 4, 7 and 14 below) and accepted a contribution **after the General Election** without the contributor's redesignation for the 1990 campaign (number 10 below).

The following contributions (from Exhibit C) fall into one or both of the above-described categories, illegally redesignated to the Primary or over the individual limits:

	<u>Contributor</u>	<u>Date</u>	<u>Amount</u>	<u>Problem</u>
1.	Kenneth N. Dayton	10/26/90	\$2,000	\$1,000 redesignation
2.	James D. Gollin	10/31/90	\$2,000	\$1,000 redesignation
3.	Cynthia L. Hendricks	10/29/90	\$ 10	\$10 over limit
4.	M. Christine Jurzykowski	10/30/90	\$2,000	\$2,000 redesignation (of which \$1,000 also over limit)
5.	Joshua Mailman	10/22/90	\$2,000	\$1,000 redesignation
6.	Phyllis Mailman Trust	10/22/90	\$2,000	\$1,000 redesignation
7.	William F. Messinger	10/23/90	\$2,100	\$1,000 redesignation \$100 over limit
8.	David J. Morris	10/25/90	\$ 400	\$400 redesignation
9.	Richard Perl	10/31/90	\$2,000	\$1,000 redesignation
10.	Lucy E. Quantance	11/7/90	\$ 750	\$ 750 redesignation
11.	Alan Slifka	11/1/90	\$2,000	\$1,000 redesignation
12.	Yoko Uehara	10/29/90	\$2,000	\$1,000 redesignation
13.	Genevieve Vaughn	11/1/90	\$2,000	\$1,000 redesignation
14.	Samuel Kaplan	11/5/90	\$2,500	\$500 over limit
15.	AFSCME	11/2/90	\$2,500	\$2,500 redesignation
16.	American Postal Workers	10/19/90	\$1,000	\$1,000 redesignation
17.	Carpenters Legislative Imp. Committee	10/26/90	\$2,000	\$2,000 redesignation
18.	Federal Retirees PAC	11/19/90	\$2,236.73	\$2,236 redesignation
19.	IBEW COPE	10/22/90	\$2,000	\$2,000 redesignation
20a.	Independent Action PAC	10/19/90	\$1,500	\$1,500 redesignation
20b.		10/26/90	\$1,000	\$1,000 redesignation

TOTAL illegally redesignated/over contribution limits \$25,086

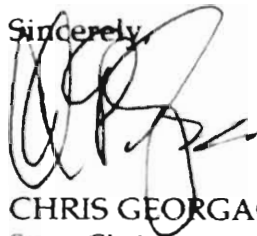
9
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2

The committee appears to have been blessed with a sudden infusion of contributions in late October 1990, some of which -- even after redesignation to the Primary -- it could not legally accept because of its modest \$8,559.42 net debts outstanding.

But -- caught up in a tight race which turned out days later to be an upset victory -- the committee accepted those contributions anyway, redesignating them to the Primary, albeit illegally (as discussed above). Then, to cover its tracks, seven months later and after the General Election, the committee amended its Primary Election report to show -- without any factual basis -- that its Primary debt rose to \$26,791 (Exhibit B: May 18, 1991). In doing so, the committee gave itself extra "breathing room" to justify its acceptance of contributions toward debt retirement which it otherwise could not legally accept. In other words, the Wellstone for Senate Committee enabled itself to raise "debt retirement" contributions for a largely fictitious Primary debt.

We ask that the Commission open an investigation into this matter immediately. Please feel free to contact us at 612/222-0022 with any questions.

Sincerely,



CHRIS GEORGACAS
State Chair,
Independent-Republicans
of Minnesota



JACK MEEKS
National Committeeman

EVELYN AXDAHL
National Committeewoman

Attachments

cc: Secretary of the Senate
Senate Ethics Committee
U.S. Senator Paul Wellstone

304 / 45210



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20461

March 8, 1994

Chris Georgacas
State Chair, Independent-Republicans
of Minnesota
480 Cedar Street, Suite 560
Saint Paul, Minnesota 55101

Dear Mr. Georgacas:

This is to acknowledge receipt on March 4, 1994, of your letter dated February 28, 1994. The Federal Election Campaign Act of 1971, as amended ("the Act") and Commission Regulations require that the contents of a complaint meet certain specific requirements. One of these requirements is that a complaint be sworn to and signed in the presence of a notary public and notarized. Your letter did not contain a notarization on your signature and was not properly sworn to. We note that although exhibits were referenced in your letter, none were attached.

In order to file a legally sufficient complaint, you must swear before a notary that the contents of your complaint are true to the best of your knowledge and the notary must represent as part of the jurat that such swearing occurred. The preferred form is "Subscribed and sworn to before me on this ____ day of ____, 19__." A statement by the notary that the complaint was sworn to and subscribed before him/her also will be sufficient. We regret the inconvenience that these requirements may cause you, but we are not statutorily empowered to proceed with the handling of a compliance action unless all the statutory requirements are fulfilled. See 2 U.S.C. § 437g.

Enclosed is a Commission brochure entitled "Filing a Complaint." I hope this material will be helpful to you should you wish to file a legally sufficient complaint with the Commission.

If you have any questions concerning this matter, please
contact me at (202) 219-3410.

Sincerely,



Retha Dixon
Docket Chief

Enclosure

cc: Jack Meeks
Evelyn Axdahl
Wellstone for Senate

6543745212



Independent Republicans of Minnesota

480 Cedar Street, Suite 560
Saint Paul, Minnesota 55101

(612) 222-0022
(612) 224-4122 (fax)

May 31, 1995

MUR 4227

Federal Election Commission
Office of the General Counsel
999 E Street
Washington, DC 20463

Dear Sirs:

I am writing to file a formal complaint against the Wellstone for Senate Committee (FEC identification number C00237180) and United States Senator Paul Wellstone concerning their (1) improper acceptance of campaign contributions in excess of the contribution limits, and (2) failure to properly report debts.

Below I detail the facts involved in this matter, and I have attached copies of relevant information:

- **Exhibit A:** FEC report with \$910 contribution from Dean Alger
- **Exhibit B:** Motor Vehicle Record Display of bus purchased by Dean Alger and later sold to the Wellstone for Senate Committee
- **Exhibit C:** FEC report with \$1,736 insurance payment to Dean Alger
- **Exhibit D:** FEC report with \$766.43 payment to Dean Alger for wages
- **Exhibit E:** FEC report with \$463.08 bus lease payment to Dean Alger
- **Exhibit F:** FEC report where Committee reports debts of \$3,394.58 for bus lease and finance charges and \$1,081.38 for bus purchase plus finance charges owed to Dean Alger
- **Exhibit G:** FEC report showing the Committee paid for bus maintenance and repairs completed during the campaign

The Wellstone for Senate Committee and Paul Wellstone used an old school bus as a centerpiece of their 1990 campaign. The bus they used was purchased by Dean Alger on July 26, 1990 [This bus was later sold by Dean Alger to the Committee on November 21, 1990, after the election] (Exhibit B). The bus had a value of \$3,500 (according to Paul Wellstone, *Star Tribune*, August 8, 1990), which exceeds the legal contribution limit for an individual. According to FEC reports, Dean Alger also gave a \$910.00 cash contribution to the Wellstone for Senate Committee, on June 30, 1990 (Exhibit A).

After the Committee began using the bus, Dean Alger was paid \$1,736 for insurance on August 23, 1990 (Exhibit C), \$41.55 for shipping and supplies on September 7, 1990, and \$9.46 for supplies on October 9, 1990. Alger was also paid wages of \$766.43 by the Committee on October 16, 1990 (Exhibit D). After the election was over, the bus was sold by Dean Alger to the Committee on November 21, 1990 (Exhibit B). The mid-year 1991 FEC report shows a payment of \$463.08 to Dean Alger for the bus lease on March 27, 1991 (Exhibit E). The committee also reported a debt of \$3,394.58 for the bus lease and finance charges and \$1,081.38 for bus purchase and finance charges. The Committee reports the debt as being incurred between January 1, 1991 and June 30, 1991 (Exhibit F). The Committee reports a total debt for bus lease and purchase plus finance charges of \$4,475.96 for a \$3,500 bus.

The Committee obviously knowingly violated FEC guidelines by using the bus throughout the campaign for free. The Committee paid for repairs to the bus during the campaign (Exhibit G).

The Committee used the bus as a major focus of the campaign. The candidate, Paul Wellstone, was quoted in an August 8, 1990 article "Wellstone whistle-stop bus battles Boschwitz bucks" in the *Minneapolis Star Tribune* as saying "It's (Sen.) Rudy Boschwitz's \$6 million vs. our \$3,500 bus," -- a bus the Committee did not own or acknowledge as an in-kind contribution. The Committee continued to use the bus throughout the campaign paying the bus's expenses, without owning the bus or paying any fee to lease the bus or incurring any debt for using the bus until after the election.

Senator Wellstone and the Committee's use of the bus from August 1990 through November of 1990 appears to be in violation of 2 USC §441a. (a) (1) (A) for receiving an excessive contribution from an individual. By using the bus, the campaign accepted an illegal contribution in excess of the contribution limits, and only bought and paid for the bus after it was clear Wellstone had won the election. The Wellstone Committee has also failed to properly report debts it owed to Mr. Alger pursuant to 11 CFR §104.11 (a) and (b) and §116.5.

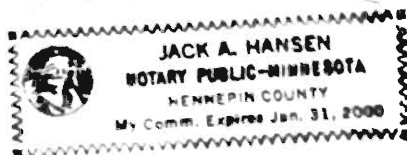
This is not the first time the Wellstone for Senate Committee has had trouble complying with FEC regulations. In 1991 the FEC fined the Committee \$6,000 for failing to report \$60,000 of contributions on time, and in February 1994 I filed a complaint asserting that Wellstone and the Committee artificially inflated their campaign debt to accept more contributions.

I ask that the Commission open an investigation into this matter immediately. Please feel free to contact me at 612/ 222-0022 with any questions.

Sincerely,



Chris Georgacas
Chairman, Independent-Republicans of Minnesota



3045745214

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

PAGE 3 OF 9
FOR LINE NUMBER 11(a)(i)
or commercial

Contributions from Individuals/Persons

Any information copied from such Reports and Statements may not be sold or used by any person for the purposes, other than using the name and address of any political committee to solicit contributions from such

NAME OF COMMITTEE (in full)

Wellstone for Senate

C00237180

Exhibit A

<p>A. Full Name, Mailing Address and ZIP Code</p> <p>John D. French 2200 Northwest Center Mpls., MN 55409</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Faegre Benson</p> <p>Occupation</p> <p>Attorney</p> <p>Aggregate Year-to-Date > \$ 350.00</p>	<p>Date (month, day, year)</p> <p>6-29-90</p>	<p>Amount of Each Receipt this Period</p> <p>\$250.00</p>
<p>B. Full Name, Mailing Address and ZIP Code</p> <p>Carolyn C. Graham 95 Leaf St. Long Lake, MN 55356</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Self-Employed</p> <p>Occupation</p> <p>Owner Frog Island Books</p> <p>Aggregate Year-to-Date > \$ 350.00</p>	<p>Date (month, day, year)</p> <p>5-17-90</p>	<p>Amount of Each Receipt this Period</p> <p>\$350.00</p>
<p>C. Full Name, Mailing Address and ZIP Code</p> <p>Arthur T. Himmelman 210 West Grant St. #402 Mpls., MN 55403</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Humphrey Institute</p> <p>Occupation</p> <p>Scholar</p> <p>Aggregate Year-to-Date > \$ 269.64</p>	<p>Date (month, day, year)</p> <p>6-28-90</p>	<p>Amount of Each Receipt this Period</p> <p>\$100.00</p>
<p>D. Full Name, Mailing Address and ZIP Code</p> <p>Adam Hochschild 84 Seward St. San Francisco, CA 94114</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Information Requested</p> <p>Occupation</p> <p></p> <p>Aggregate Year-to-Date > \$ 500.00</p>	<p>Date (month, day, year)</p> <p>6-11-90</p>	<p>Amount of Each Receipt this Period</p> <p>\$500.00</p>
<p>E. Full Name, Mailing Address and ZIP Code</p> <p>Dean Alger 2932 S. 15th St. Moorhead MN 55117</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Moorhead Univ.</p> <p>Occupation</p> <p>Professor</p> <p>Aggregate Year-to-Date > \$ 910.00</p>	<p>Date (month, day, year)</p> <p>6-30-90</p>	<p>Amount of Each Receipt this Period</p> <p>\$910.00</p>
<p>F. Full Name, Mailing Address and ZIP Code</p> <p>Jane Hodgson 1537 W. Fisk St. Paul, MN 55117</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Self-Employed</p> <p>Occupation</p> <p>Physician</p> <p>Aggregate Year-to-Date > \$ 900.00</p>	<p>Date (month, day, year)</p> <p>5-11-90</p>	<p>Amount of Each Receipt this Period</p> <p>\$650.00</p>
<p>G. Full Name, Mailing Address and ZIP Code</p> <p>Jane Hodgson</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>See Above</p> <p>Occupation</p> <p></p> <p>Aggregate Year-to-Date > \$ 750.00</p>	<p>Date (month, day, year)</p> <p>5-11-90</p>	<p>Amount of Each Receipt this Period</p> <p>\$30.00</p>

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

145215

VIEW

MOTOR VEHICLE RECORD DISPLAY

694/18/25

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TYPE: P      KEY: RV60448      DUB:      PROC ID: 00
FILE1:      FILE2:      FLAG:      SUSP NUMBER 846
PLATE: RV60448  STKR: T314465D EXP: 02 96  TOX: 79.00 PREV PLT: BYE6073
VIN: SE528S128092  YR: 68 MK: CHEV  STYLE: MH SERIES: SCB  BASH: 015000
COLOR:      EMPTY WT:  AXLES:  MC ENG:  PR OWN: 3
CLASS: 17  FUEL: N  LAST TRNS: R  DATE: 02 08 95  NEW:  BATCH: 501476
TITLE: W2190C304 PRINT: Y TRF DATE: 11 21 90 ODOMETER:  NR LIENS: 0
OWNER: WELLSTONE FOR SENATE      DUB 00 00 0000 ID: W081230640000

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1ST SECURED ENTRY:

ST FALL

63 55165

ADDER:

DATE OF LIEN:

INSID INDC:

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RE ISSUE DATE YEAR:
DOB

LESSEE) :

LESSFE 21

LESSEE 3:

ADDR:

7122

VEHICLE PRIOR OWNERS

04/10/25

15:44:38

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PLATE NO: RV60448

VIN NU: SE528512A092

PREV OWN: ALGER DEAN ERNEST

DOI: 051448

PREV OWN:

FILE: B3170761.C

TRF DI: 072690

EXID: 4291

DDUM: 0000000000 11P

ADDR: 2932 S 15TH AV
MOORHEAD

14 5656W

CHRISTIANSEN MICHAEL JOHN
CHRISTIANSEN BEVERLY LOUISE

002252

032550

T13109127

043004

300 LONGFELLOW ST NE
FRIDLEY Q3 55421

0231

[illegible]

WORK CHARLES FREDRICK

051238

SEP 14 1963

774 MAPLE AV
SPRING LAKE OR 92 55433

M. A. S.

1112 *Journal of Interpersonal Violence*

STATE OF MINNESOTA
COUNTY OF HENNEPIN

[illegible]

Exhibit B.4

113104172	CRIMINAL	44	2049	31908266
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NO SECURITY INTEREST

OWNER 300 111 22752 TWO 07700
 CHRISTIANSEN RICHARD JOHN
 CHRISTIANSEN BEVERLY LOUISE
 700 LONGFELLOW ST NE
 PRIDLEY NE 55422

1960 000000 01

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☐ The information is being furnished to you for your information only. It is not to be distributed outside your agency.

Alger: Deser: 10/10/11
 2932 15th Ave North, Off Hwy 12, NW, 50508
 5/14/18

NO NEW PAPER - 100% RECYCLED

Exhibit B.5

[illegible]

Operating expenditures

Information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions from such or other than using the name and address of any political committee to solicit contributions from such or

OF COMMITTEE (in Full)

Exhibit C

WELLSTONE FOR SENATE

<p>A. Full Name, Mailing Address and ZIP Code</p> <p>Aardvard Balloons 597 N Snelling Ave St Paul, MN 55104</p>	<p>Purpose of Disbursement</p> <p>State Fair Balloons</p> <p>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p> <p>9-7-90</p>	<p>Amount of Each Disbursement This Period</p> <p>346.13</p>
<p>B. Full Name, Mailing Address and ZIP Code</p> <p>Scott Adams 139 E Sims St Paul, MN 55117</p>	<p>Purpose of Disbursement</p> <p>wages</p> <p>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p> <p>9-1-90 9-17-90</p>	<p>Amount of Each Disbursement This Period</p> <p>420.48 420.48</p>
<p>C. Full Name, Mailing Address and ZIP Code</p> <p>Scott Adams same as above</p>	<p>Purpose of Disbursement</p> <p>health benefit feed and mileage</p> <p>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p> <p>9-7-90 9-7-90</p>	<p>Amount of Each Disbursement This Period</p> <p>70.00 35.92</p>
<p>D. Full Name, Mailing Address and ZIP Code</p> <p>Tim Adams 400 1/2 E 8th St Morris, MN 56267</p>	<p>Purpose of Disbursement</p> <p>Mileage</p> <p>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p> <p>8-24-90</p>	<p>Amount of Each Disbursement This Period</p> <p>40.00</p>
<p>E. Full Name, Mailing Address and ZIP Code</p> <p>Tim Adams same</p>	<p>Purpose of Disbursement</p> <p>wages</p> <p>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p> <p>9-1-90 9-17-90</p>	<p>Amount of Each Disbursement This Period</p> <p>206.43 206.43</p>
<p>F. Full Name, Mailing Address and ZIP Code</p> <p>Dean Alger 1496 W Larpentur St Paul, MN 55113</p>	<p>Purpose of Disbursement</p> <p>Insurance Shipping and supplies</p> <p>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p> <p>8-23-90 9-07-90</p>	<p>Amount of Each Disbursement This Period</p> <p>1,736.00 41.55</p>
<p>G. Full Name, Mailing Address and ZIP Code</p> <p>Allnet Communications 701 4th Ave S Minneapolis, MN</p>	<p>Purpose of Disbursement</p> <p>Telephone</p> <p>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p> <p>9-19-90</p>	<p>Amount of Each Disbursement This Period</p> <p>1,090.52</p>
<p>H. Full Name, Mailing Address and ZIP Code</p> <p>AmeriData 10200 51st Ave North Minneapolis, MN 55442</p>	<p>Purpose of Disbursement</p> <p>Equipment rental</p> <p>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p> <p>8-25-90</p>	<p>Amount of Each Disbursement This Period</p> <p>106.00</p>
<p>I. Full Name, Mailing Address and ZIP Code</p> <p>Ellen R Anderson 921 1/2 Cromwell Ave St Paul, MN 55114</p>	<p>Purpose of Disbursement</p> <p>wages</p> <p>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p> <p>9-01-90 9-17-90</p>	<p>Amount of Each Disbursement This Period</p> <p>402.62 402.62</p>

U. TOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Operating Expenditures

Use separate schedule(s)
for each category of the
and Summary Page

FOR LINE NUMBER

17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions for commercial purposes, other than using the name and address of any political committee to solicit contributions from such

NAME OF COMMITTEE (in Full)

WELLSTONE FOR SENATE

Exhibit D

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Scott Adams 139 Sims St Paul, MN 55117	Wages " Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-01-90 10-10-90 10-16-90	209.16 209.16 209.16
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Scott Adams same as above	Mileage, food Consulting Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-09-90 10-10-90	48.21 1,184.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
ADVANTAGE TRAVEL 4600 W 77th St, Suite 210 Edina, MN 55435	Travel Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-16-90	3,104.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Dean Alger 11496 W Larpentur St Paul, MN 55113	Wages Supplies Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-16-90 10-09-90	766.43 9.46
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Allnet Communications 701 4th Ave S Minneapolis, MN 55403	telephone Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-01-90	1,812.76
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Ellen Anderson 921 1/2 Cromwell Ave St Paul, MN 55114	Wages " Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-01-90 10-10-90 10-16-90	288.20 288.20 288.20
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Mark Anderson 2517 W 42nd St Minneapolis, MN 55410	Wages " Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-10-90 10-16-90	368.79 368.79
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Mark Anderson same as above	Health benefit Podium Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-03-90 10-09-90	119.00 79.50
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Asset Recovery Corp 1907 Charles Ave St Paul, MN	Computer Maintenance, repair Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-10-90	291.50

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 1 OF 15
FOR LINE NUMBER 17

Operating Expenditures

Any information copied from such Reports and Statements may not be sold or used by any person for the purposes, other than using the name and address of any political committee to solicit contributions from such

r for commercial

Exhibit E

NAME OF COMMITTEE (in Full)

WELLSTONE FOR SENATE

C00237180

A. Full Name, Mailing Address and ZIP Code Adams, Timothy 400 1/2 E 8th St Morris, MN 56267	Purpose of Disbursement Mileage, gas Telephone Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 1-16-91 1-16-91	Amount of Each Disbursement This Period 140.00 210.76
B. Full Name, Mailing Address and ZIP Code Advantage Travel 4600 W 77th St, Suite 210 Edina, MN 55435	Purpose of Disbursement Air Travel " Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 1-29-91 3-04-91	Amount of Each Disbursement This Period 2,000.00 1,000.00
C. Full Name, Mailing Address and ZIP Code Advantage Travel same as above	Purpose of Disbursement Travel " Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 3-27-91 5-09-91	Amount of Each Disbursement This Period 2,000.00 500.00
D. Full Name, Mailing Address and ZIP Code AFSOME 265 Lafayette Rd, Rm B St Paul, MN 55107	Purpose of Disbursement Phone Bank (telephone use) Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 2-27-91	Amount of Each Disbursement This Period 430.00
E. Full Name, Mailing Address and ZIP Code Erik Ahlgren 2200 1st Bank Place, Rm B Minneapolis, MN 55402	Purpose of Disbursement Telephone deposit refund Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 1-15-91	Amount of Each Disbursement This Period 800.00
F. Full Name, Mailing Address and ZIP Code Airborne Express PO Box 91001 Seattle, WA 98111	Purpose of Disbursement Shipping Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 2-15-91	Amount of Each Disbursement This Period 60.00
G. Full Name, Mailing Address and ZIP Code Alger, Dean 2932 So 15th Ave Moorhead, MN 56560	Purpose of Disbursement Bus Lease Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 3-27-91	Amount of Each Disbursement This Period 463.08
H. Full Name, Mailing Address and ZIP Code Allnet Communications 701 S 4th Ave Minneapolis, MN 55403	Purpose of Disbursement telephone " Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 2-25-91 3-04-91 3-12-91	Amount of Each Disbursement This Period 425.00 425.00 425.00
I. Full Name, Mailing Address and ZIP Code Allnet Communications same as above	Purpose of Disbursement telephone " Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 3-19-91 4-03-91 4-16-91	Amount of Each Disbursement This Period 425.00 425.00 425.00

SUBTOTAL of Disbursements This Page (optional)

10,153.84

TOTAL This Period (last page this line number only)

SCHEDULE D
(Revised 3/80)

DEBTS AND OB
Excluding Loans

Exhibit F

Page 1 of 13 for
LINE NUMBER 10
(Use separate schedules
for each numbered line)

1/01/91

6/30/91

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
WELLSTONE FOR SENATE C00237180				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Abortion Rights Council 3255 Hennepin Ave Mpls, MN 55408	699.22	- -	- -	699.22
Nature of Debt (Purpose): mailing lists				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Advantage Travel 4600 W 77th St, Suite 210 Edina, MN 55435	5,959.00	469.00	5,500.00	928.00
Nature of Debt (Purpose): Air Travel				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor AFSCME 265 Lafayette Rd Rm B St Paul, MN 55107	430.00	- -	430.00	0
Nature of Debt (Purpose): office space for phone bank				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Airborne Express PO Box 91001 Seattle, WA 98111	60.00	- -	60.00	0
Nature of Debt (Purpose): air express shipping				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Dean Alger 2932 15th Ave S Moorhead, MN 56560	0	3,394.58	463.08	2,931.50
Nature of Debt (Purpose): Bus lease, plus finance charges				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Dean Alger 2932 15th Ave S Moorhead, MN 56560	0	1,081.38	-	1,081.38
Nature of Debt (Purpose): bus purchase plus finance charges				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

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SCHEDULE B

ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
for each category of the
filing Summary Page

 11 13
FOR LINE NUMBER
17

Operating Expenditures

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such

NAME OF COMMITTEE (in Full)

WELLSTONE FOR SENATE

Exhibit G

A. Full Name, Mailing Address and ZIP Code Paul Scott 29 N 9th St Minneapolis, MN 55403	Purpose of Disbursement gas for bus travel bus maintenance & repair bus gas maintenance Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10-06-90 10-06-90 10-09-90	Amount of Each Disbursement This Period 90.53 297.41 63.45
B. Full Name, Mailing Address and ZIP Code Paul Scott same as above	Purpose of Disbursement supplies gas for bus bus maintenance Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10-10-90 10-10-90 10-10-90	Amount of Each Disbursement This Period 13.76 79.52 34.85
C. Full Name, Mailing Address and ZIP Code Paul Scott same as above	Purpose of Disbursement gas and supplies bus maintenance Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10-15-90 10-15-90	Amount of Each Disbursement This Period 59.42 267.95
D. Full Name, Mailing Address and ZIP Code Dick Senese 3825 18th Ave S Minneapolis, MN 55407	Purpose of Disbursement wages " " Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10-01-90 10-10-90 10-16-90	Amount of Each Disbursement This Period 371.76 371.76 371.76
E. Full Name, Mailing Address and ZIP Code Dick Senese same as above	Purpose of Disbursement travel paint for bus Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10-01-90 10-05-90 10-09-90	Amount of Each Disbursement This Period 142.28 1,148.00 340.57
F. Full Name, Mailing Address and ZIP Code Sound 80 4027 IDS Center Minneapolis, MN 55402	Purpose of Disbursement Advertising production " " Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10-12-90 10-12-90	Amount of Each Disbursement This Period 220.04 417.21
G. Full Name, Mailing Address and ZIP Code Lynn Taplin 787 Ashland Ave St Paul, MN 55104	Purpose of Disbursement wages Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10-01-90	Amount of Each Disbursement This Period 401.86
H. Full Name, Mailing Address and ZIP Code Michelle Thom 1814 Bryant Ave Minneapolis, MN 55403	Purpose of Disbursement wages " " Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10-01-90 10-10-90 10-16-90	Amount of Each Disbursement This Period 88.10 46.76 41.34
I. Full Name, Mailing Address and ZIP Code Scott Toop 942 15th Ave SE, Minneapolis, MN 55414	Purpose of Disbursement wages " " transportation Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10-10-90 10-16-90 10-09-90	Amount of Each Disbursement This Period 34.63 199.54 202.74

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

**FEDERAL ELECTION
CAMPAIGN LAWS**

Compiled by

**THE
FEDERAL
ELECTION
COMMISSION**



JUNE 1994

9 6 0 4 3 7 4 5 2 2 6

her duties as a holder of Federal office, may be contributed to any organization described in section 170(c) of title 26, or may be used for any other lawful purpose, including transfers without limitation to any national, State, or local committee of any political party; except that no such amounts may be converted by any person to any personal use, other than to defray any ordinary and necessary expenses incurred in connection with his or her duties as a holder of Federal office.

§ 439b. Repealed.

§ 439c. Authorization of appropriations

NOTE: This section contains the authorization for FEC appropriations for FY 1975 through FY 1978, and for FY 1981. While contained in the United States Code, this provision has no substantive election law content.

§ 440. Repealed.

§ 441. Repealed.

§ 441a. Limitations on contributions and expenditures

(a) *Dollar limits on contributions.*

(1) No person shall make contributions—

(A) to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000;

(B) to the political committees established and maintained by a national political party, which are not the authorized political committees of any candidate, in any calendar year which, in the aggregate, exceed \$20,000; or

(C) to any other political committee in any calendar year which, in the aggregate, exceed \$5,000.

(2) No multicandidate political committee shall make contributions—

(A) to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$5,000;

(B) to the political committees established and maintained by a national political party, which are not the authorized political committees of any candidate, in any calendar year, which, in the aggregate, exceed \$15,000; or

code of federal regulations



Federal Elections

11

Revised as of January 1, 1994

voter drives, and for each fundraising program or exempt activity, as described in 11 CFR 106.6(a)(2) or 106.6(b).

(4) *Reporting of allocated disbursements.* A political committee that pays allocable expenses in accordance with 11 CFR 106.6(g) or 106.6(e) shall also report each disbursement from its federal account or its separate allocation account in payment for a joint federal and non-federal expense or activity. In the report covering the period in which the disbursement occurred, the committee shall state the full name and address of each person to whom the disbursement was made, and the date, amount and purpose of each such disbursement. If the disbursement includes payment for the allocable costs of more than one activity, the committee shall itemize the disbursement, showing the amounts designated for payment of administrative expenses and generic voter drives, and for each fundraising program or exempt activity, as described in 11 CFR 106.6(a)(2) or 106.6(b). The committee shall also report the total amount expended by the committee that year, to date, for each category of activity.

(5) *Recordkeeping.* The treasurer shall retain all documents supporting the committee's allocated disbursements for three years, in accordance with 11 CFR 104.14.

745 FR 28008, June 25, 1990; 55 FR 24007, Aug. 29, 1990]

§ 104.11 Continuous reporting of debts and obligations.

(a) Debts and obligations owed by or to a political committee which remain outstanding shall be continuously reported until extinguished. See 11 CFR 104.14. These debts and obligations shall be reported on separate schedules together with a statement explaining the circumstances and conditions under which each debt and obligation was incurred or extinguished. Where such debts and obligations are settled for less than their reported amount or value, the reporting committee shall include a statement as to the circumstances and conditions under which the debt or obligation was extinguished and the amount paid.

(b) A debt or obligation, including a loan, written contract, written promise

Federal Election Commission

or written agreement to make an expenditure, the amount of which is \$500 or less, shall be reported as of the time payment is made or not later than 60 days after such obligation is incurred, whichever comes first. A debt or obligation, including a loan, written contract, written promise or written agreement to make an expenditure, the amount of which is over \$500 shall be reported as of the date on which the debt or obligation is incurred, except that any obligation incurred for rent, salary or other regularly recurring administrative expense shall not be reported as a debt before the payment due date. See 11 CFR 116.8. If the exact amount of a debt or obligation is not known, the report shall state that the amount reported is an estimate. Once the exact amount is determined, the political committee shall either amend the report(s) containing the estimate or indicate the correct amount on the report for the reporting period in which such amount is determined.

[45 FR 16108, Mar. 7, 1980, as amended at 55 FR 28226, June 27, 1990]

§ 104.12 Beginning cash on hand for political committees.

Political committees which have cash on hand at the time of registration shall disclose on their first report the source(s) of such funds, including the information required by 11 CFR 104.3(a)(1). The cash on hand balance is assumed to be composed of those contributions most recently received by the committee. The committee shall exclude from funds to be used for Federal elections any contributions not permissible under the Act. See 11 CFR parts 110, 114, and 115.

§ 104.13 Disclosure of receipt and consumption of in-kind contributions.

(a) (1) The amount of an in-kind contribution shall be equal to the usual and normal value on the date received. Each in-kind contribution shall be reported as a contribution in accordance with 11 CFR 104.3(a).

(2) Except for items noted in 11 CFR 104.14(b), each in-kind contribution shall also be reported as an expenditure at the same usual and normal value and reported on the appropriate ex-

penditure schedule, in accordance with 11 CFR 104.3(b).

(b) Contributions of stocks, bond art objects, and other similar items which be liquidated shall be reported as follows:

(1) If the item has not been liquidated at the close of a reporting period, the committee shall record as a memorandum entry (not as cash) the item's fair market value on the date received, including the name and mailing address (and where in excess of \$500, the occupation and name of employer) of the contributor.

(2) When the item is sold, the committee shall record the proceeds. It shall also report the (i) name and mailing address (and, where in excess of \$500, the occupation and name of employer) of the purchaser, if purchased directly from the candidate or committee (as the purchaser shall be considered to have made a contribution to the committee), and (ii) the identification of the original contributor.

§ 104.14 Formal requirements regarding reports and statements.

(a) Each individual having the responsibility to file a designation, report or statement required under this subchapter shall sign the original designation, report or statement.

(b) Each political committee or other person required to file any report or statement under this subchapter shall maintain all records relevant to such reports or statements as follows:

(1) Maintain records, including bank records, with respect to the matters required to be reported, including vouchers, worksheets, receipts, bills and accounts, which shall provide in sufficient detail the necessary information and data from which the filed reports and statements may be verified, explained, clarified, and checked for accuracy and completeness;

(2) Preserve a copy of each report or statement required to be filed under 11 CFR parts 102 and 104;

(3) Keep all reports required to be preserved under 11 CFR 104.14 available for audit, inspection, or examination by the Commission or its authorized representative(s) for a period of not less than 3 years after the report or statement is filed. (See 11 CFR 102.9(e))



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 19, 1995

Chris Georgakas
Independent-Republicans of Minnesota
480 Cedar Street, Suite 560
Saint Paul, Minnesota 55101

Dear Mr. Georgakas:

This is to acknowledge receipt on June 16, 1995, of your letter dated May 31, 1995. The Federal Election Campaign Act of 1971, as amended ("the Act") and Commission Regulations require that the contents of a complaint meet certain specific requirements. One of these requirements is that a complaint be sworn to and signed in the presence of a notary public and notarized. Your letter was not properly sworn to.

In order to file a legally sufficient complaint, you must swear before a notary that the contents of your complaint are true to the best of your knowledge and the notary must represent as part of the jurat that such swearing occurred. The preferred form is "Subscribed and sworn to before me on this ____ day of ____, 19__." A statement by the notary that the complaint was sworn to and subscribed before him also will be sufficient. We regret the inconvenience that these requirements may cause you, but we are not statutorily empowered to proceed with the handling of a compliance action unless all the statutory requirements are fulfilled. See 2 U.S.C. § 437g.

Enclosed is a Commission brochure entitled "Filing a Complaint." I hope this material will be helpful to you should you wish to file a legally sufficient complaint with the Commission.

Please note that this matter will remain confidential for a 15 day period to allow you to correct the defects in your complaint. If the complaint is corrected and refiled within the 15 day period, the respondents will be so informed and provided a copy of the corrected complaint. The respondents will then have an additional 15 days to respond to the complaint on the merits. If the complaint is not corrected, the file will be closed and no additional notification will be provided to the respondents.

960474520

If you have any questions concerning this matter, please
contact me at (202) 219-3410.

Sincerely,


Retha Dixon
Docket Chief

Enclosure

cc: Wellstone fore Senate
Dean Alger

260474521



Independent Republicans of Minnesota

480 Cedar Street, Suite 560
Saint Paul, Minnesota 55101

(612) 222-0022
(612) 224-4122 (fax)

Here is a copy the complaint which was sworn to in the presence of a notary public.

I believe the complaint now meet the requirements for a legally sufficient complaint. If there are any further questions feel free to contact us again.

Sorry for any inconvenience this may have caused.

2011/04/22

CS. 100011 02 WCF

The Committee obviously knowingly violated FEC guidelines by using the bus throughout the campaign for free. The Committee paid for repairs to the bus during the campaign (Exhibit G).

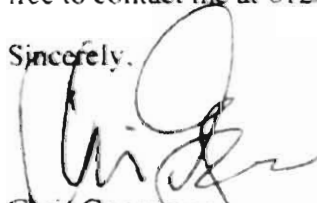
The Committee used the bus as a major focus of the campaign. The candidate, Paul Wellstone, was quoted in an August 8, 1990 article "Wellstone whistle-stop bus battles Boschwitz bucks" in the *Minneapolis Star Tribune* as saying "It's (Sen.) Rudy Boschwitz' \$6 million vs. our \$3,500 bus," -- a bus the Committee did not own or acknowledge as an in-kind contribution. The Committee continued to use the bus throughout the campaign paying the bus's expenses, without owning the bus or paying any fee to lease the bus or incurring any debt for using the bus until after the election.

Senator Wellstone and the Committee's use of the bus from August 1990 through November of 1990 appears to be in violation of 2 USC §441a. (a) (1) (A) for receiving an excessive contribution from an individual. By using the bus, the campaign accepted an illegal contribution in excess of the contribution limits, and only bought and paid for the bus after it was clear Wellstone had won the election. The Wellstone Committee has also failed to properly report debts it owed to Mr. Alger pursuant to 11 CFR §104.11 (a) and (b) and §116.5.

This is not the first time the Wellstone for Senate Committee has had trouble complying with FEC regulations. In 1991 the FEC fined the Committee \$6,000 for failing to report \$60,000 of contributions on time, and in February 1994 I filed a complaint asserting that Wellstone and the Committee artificially inflated their campaign debt to accept more contributions.

I ask that the Commission open an investigation into this matter immediately. Please feel free to contact me at 612/ 222-0022 with any questions.

Sincerely,



Chris Georgakas
Chairman, Independent-Republicans of Minnesota

Subscribed and sworn to me on this 22 day of August, 1990

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

JUN 26 11 36 AM '90

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

June 30, 1995

Chris Georgacas, Chairman
Independent Republicans of Minnesota
480 Cedar St.
Suite 560
St. Paul, MN 55101

RE: MUR 4227

Dear Mr. Georgacas:

This letter acknowledges receipt on June 26, 1995, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). The respondent(s) 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 4227. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure
Procedures

9604 / 4524



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20460

June 30, 1995

Richard Kahn, Treasurer
Wellstone for Senate
P.O. Box 65588
St. Paul, MN 55165

RE: MUR 4227

Dear Mr. Kahn:

The Federal Election Commission received a complaint which indicates that Wellstone for Senate ("Committee") and you, as treasurer, 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 4227. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Committee and you, as treasurer, 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.

969474525

Richard Kahn
Page 2
MUR 4227

If you have any questions, please contact me at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

1. Complaint
2. Procedures

2 3 0 4 7 4 5 2 6



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 30, 1995

The Honorable Paul Wellstone
717 Hart Bldg.
Washington, DC 20510

RE: MUR 4227

Dear Senator Wellstone:

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 4227. 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.

14527

Honorable Paul Wellstone
Page 2
MUR 4227

If you have any questions, please contact me at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

1. Complaint
2. Procedures

260474528



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20540

June 30, 1995

The Honorable Paul Wellstone
455 Ashland
St. Paul, MN 55102

RE: MUR 4227

Dear Senator Wellstone:

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 4227. 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.

Honorable Paul Wellstone
Page 2
MUR 4227

If you have any questions, please contact me at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures
1. Complaint
2. Procedures

0604 / 452 0



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

June 30, 1995

Dean Alger
1496 W. Larpentur
St. Paul, MN 55113

RE: MUR 4227

Dear Mr. Alger:

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 4227. 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.

Dean Alger
Page 2
MUR 4227

If you have any questions, please contact me at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

1. Complaint
2. Procedures

1604174522

JUL 10 11 29 AM '95

WELLSTONE FOR SENATE
P. O. BOX 65588
SAINT PAUL, MN 55165
(612) 643-0828
FEC #: C00237180

July 10, 1995

Mary L. Taksar
Central Enforcement Docket
Federal Election Commission
Washington, DC 20463

RE: MUR 4227

Dear Ms. Taksar:

I am writing in reply to your letter dated June 30, 1995, which I received on July 5, 1995. As demonstrated by the factual record, the allegations set forth in the complaint filed by Mr. Georgacas are totally without merit, as follows:

1. On or about August 17, 1990, the Wellstone for Senate Committee entered into a lease agreement with a Mr. Dean Alger to use an old school bus owned by Mr. Alger. The original lease document was misplaced, but the parties signed a formal document on the same terms and conditions in January, 1991. A copy of this lease (the "Lease") is attached hereto as Exhibit A.
2. The Lease required the Committee to make certain payments to Mr. Alger, subject to a right of set-off with respect to a portion of the cost of repairs to the bus paid for by the Committee during a certain period of time (please refer to paragraphs 3 and 4). We believed then and are still convinced that this was a commercially reasonable agreement in all respects.
3. During 1990, the Committee paid for very substantial repairs to the bus, all of which were duly reported on a timely basis in the appropriate FEC reports. The extent of the repairs actually required significantly exceeded the expectations of both parties. Consequently, the Committee owed nothing whatsoever to Mr. Alger until December, 1990.

July 10, 1995

Page 2

4. In December, 1990, the Committee incurred an unpaid Lease obligation to Mr. Alger of \$463.08. Because this obligation was less than \$500 and less than 60 days old, in complete accordance with FEC rules, it was not reported in the year-end FEC report.
5. Both a letter to Mr. Alger prepared by the Committee's bookkeeper in March, 1991 (please refer to the attached Exhibit B) and a contemporaneous ledger kept by the bookkeeper (please refer to the attached Exhibit C) confirm the exact amount and the timing of the debt incurred.

On the basis of this record, we hereby request that the Commission dismiss the complaint immediately, with a finding that there has been no violation of FEC rules. We also request that the Commission make this matter completely public.

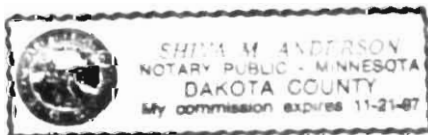
For you, this whole thing may be only a simple and brief waste of your time. But to us, the original complaint constitutes a serious abuse of the process. Mr. Georgakas actively publicized this complaint before it was officially filed with the FEC, but who will compel him to publicly apologize when it is found to be untrue? He has chosen to consume the limited time and resources of the Commission with nothing more than a purely partisan, malicious, and false cheap shot. If there are no sanctions for such behavior, isn't it further encouraged, at a tremendous risk to the compelling public interest that the Commission is charged to protect?

Sincerely,



Richard S. Kahn
Treasurer

Subscribed and sworn to me on this 10th day of July, 1995



LEASE AGREEMENT

THIS LEASE AGREEMENT, dated January __, 1991, is entered into by and between DEAN ALGER, an individual ("Alger"), and WELLSTONE FOR SENATE, the principal campaign committee of Minnesota Senator Paul Wellstone (the "Committee").

WITNESSETH, THAT:

WHEREAS, Alger and the Committee entered into a written lease agreement on or about August 17, 1990 (the "Original Lease Agreement"), whereby Alger agreed to lease certain personal property to the Committee on "commercially reasonable terms";

WHEREAS, neither Alger nor the Committee have been able to locate a copy of the Original Lease Agreement; and

WHEREAS, the purpose of this agreement is to re-document the Original Lease Agreement and to clarify the terms of such agreement;

NOW, THEREFORE, for other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, Alger and the Committee hereby agree as follows:

1. PROPERTY LEASED. Alger hereby leases to the Committee that certain bus commonly known as the "Wellstone Bus", certificate of title no. _____ (the "Bus"), and all personal property attached or affixed to the Bus.

2. TERM. This Lease Agreement shall commence on the date hereof and shall continue in effect until the earlier of the date on which the Committee exercises its purchase option described herein at paragraph 6 or the date thirty days after either Alger or the Committee gives the other written notice of its intention to terminate this agreement. The provisions of this agreement shall also be deemed to govern the terms of the Original Lease Agreement from August 17, 1990 until the date hereof.

3. RENT AND PAYMENT. The Committee shall pay Alger the sum of \$165.00 per week as rent for the Bus. Rent shall be paid by check on the first day of each month. Rent shall be prorated to reflect the actual number of days in the payment period. The Committee may set-off the obligations of Alger under paragraph 4 hereof against the rent obligations owed by the Committee to Alger.

4. MAINTAINENCE. The Committee shall keep the Bus in good repair and working order. Alger shall be responsible for 75% of the reasonable cost of all repairs to the Bus which occurred on or before November 6, 1990. The Committee

shall be responsible for the remaining portion of repair costs which arose on or before November 6, 1990 and all of the repair costs which have arisen or may arise after November 6, 1990.

5. INSURANCE. The Committee shall provide, maintain and pay for reasonably adequate public liability and property damage insurance. The Committee shall be responsible for all risk of loss relating to the bus, including but not limited to collision, theft or fire damage.

6. PURCHASE OPTION. The Committee shall have the option to purchase the Bus from Alger for the sum of \$3,200.00 plus all reasonable title and transfer fees incurred by Alger in purchasing the Bus. The Committee may exercise such option at any time within one year from the date hereof and may extend such option for an additional one year period upon the payment of \$25.00 to Alger. The option may be exercised by tendering a check to Alger in the amount of the purchase price. Upon exercise of this purchase option, Alger shall execute all reasonable documentation necessary to sell, transfer and assign good title in the Bus to the Committee. This purchase option shall survive the termination of this agreement where termination is accomplished by notice pursuant to paragraph 2 hereof.

7. DEFAULT. An event of default under this agreement shall occur where (i) the Committee fails to pay any amount due hereunder and such default continues for a period of ten days; (ii) the Committee fails to comply with any material obligation hereunder, other than a failure to pay, and such failure continues for a period of 15 days after written notice of such failure; or (iii) Alger fails to comply with any material obligation hereunder and such failure continues for a period of 15 days after written notice of such failure. Upon the occurrence of one or more events of default, the aggrieved party may proceed by appropriate actions either at law or in equity to enforce performance or to recover damages. Where Alger has defaulted under his obligation to sell, transfer and assign good title to the Bus upon exercise by the Committee of the option to purchase, the Committee shall be entitled to an equitable remedy, including but not limited to specific performance.

8. NOTICES. Any notice to either party by the other shall be deemed received upon the earlier of receipt or three days after mailing if mailed postage prepaid to the address written below or such other address as may be subsequently submitted by written notice.

9. ENTIRE AGREEMENT. THERE ARE NO AGREEMENTS OR UNDERSTANDINGS, WRITTEN OR ORAL, BETWEEN ALGER AND THE COMMITTEE WITH RESPECT TO THE BUS, OTHER THAN AS SET FORTH HEREIN. This Lease Agreement may not be altered or modified except by a writing signed by both Alger and the Committee. This Lease Agreement supercedes, in all respects, the Original Lease Agreement.

10. APPLICABLE LAW. This Lease Agreement shall be governed by the internal law, and not the choice of law provisions, of the state of Minnesota.

IN WITNESS WHEREOF, the parties hereto have executed this Lease Agreement on or as of the day and year first above written.

Dean Alger
Dean Alger

Address: 2932 15th Ave. S.,
Minneapolis, MN 55426

Wellstone For Senate

By F. Jeffrey Blodgett
Its Political Director

Address: P.O. Box 65588
St. Paul, MN 55165-0588

1501-1452-7

EXHIBIT B

UNITED STATES SENATOR

PAUL DAVID WELLSTONE
MINNESOTA

Wellstone For Senate

%

LEO B. CASHMAN
3840 ELLIOT AVE. SO.
MINNEAPOLIS, MN 55407
(612) 822-4921

3/29/91

Dear Dean

Enclosed is an account of our bus lease account with you. It shows a balance owed to you of \$463.08 as of 12/31/90. The check for this amount is enclosed. (Check #2647).

Over Jan, Feb & March we incurred \$715 each month giving us a 3/31/91 balance of \$2,145 owed you. In light of this amount, could we buy the bus from you for an amount of \$1,055? ($= 3,200 - 2,145$) We'll talk over the phone and if agreed we'll send you exact terms of an agreement and a promissory note calling for 12% interests on amounts we owe. Many thanks to you for your patience with you.

NOT PRINTED AT GOVERNMENT EXPENSE



Regards,
Leo Cashman

Vendor: Don Alger
3932 15th Ave S
Moorhead MN 56560(218) 255-6111
EXHIBIT C

Prepared By		Date	
Approved By			

Detail of Accounts Payable					DR	CR	
					Payments	Invoices	Balance
1	8/17/90 - 8/31/91	Lease				330.00	330.00
2	8/21/90	Robert Richman	}				
3		(Bass Brook Truck)			406.63		
4		75% of 542.17					
5	8/27/90	to David Graham			847.08		< 923.71
6		(75% of 1129.44)					
7	Sept Rental					715.00	
8	9/27/90	B&L Trucking 1822.00 x 75%			1366.50		
9		Richard Senese 142.28 x 75%			106.71		< 1681.92
10							
11	Oct 1990	Rental				715.00	
12	Nov 1990	"				715.00	
13	Dec 1990	"				715.00	463.08
14							
15	Jan 1991	"				715.00	
16	Feb 1991	"				715.00	1893.08
17						715.00	2608.08
18	3/27/91	✓ 2647			463.08		2145.00
19							
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15. 14529

BEFORE THE FEDERAL ELECTION COMMISSION

AUG 14 4 50 PM '96

In the Matter of

)
)
)

Enforcement Priority

SENSITIVE

GENERAL COUNSEL'S REPORT

I. INTRODUCTION

In accordance with the objectives of the Enforcement Priority System ("EPS") adopted by the Commission in May 1993, the Office of the General Counsel has periodically recommended that the Commission not pursue cases that are stale or that, in comparison to other pending matters, do not appear to warrant the use of the Commission's limited resources. This General Counsel's Report recommends the Commission not pursue 43 cases that fall within these categories.

II. CASES RECOMMENDED FOR CLOSING

A. Cases Not Warranting Further Pursuit Relative to Other Cases Pending Before the Commission

A critical component of the Priority System is identifying those pending cases that do not warrant the further expenditure of Commission resources. Each incoming matter is evaluated using Commission-approved criteria and cases that, based on their rating, do not warrant pursuit relative to other pending cases are placed in this category. By closing such cases, the Commission is able to use its limited resources to focus on more important cases.

960474520

Having evaluated incoming matters, this Office has identified 24 cases which do not warrant further pursuit relative to other pending matters.¹ A short description of each case and the factors leading to assignment of a relatively low priority and consequent recommendation not to pursue each case is attached to this Report. Attachments 1-24. As the Commission has previously requested, we have also attached responses and referral materials where that information has not been circulated previously to the Commission. Attachment 25.

B. Stale Cases

Investigations are severely impeded and require relatively greater resources when the activity, and the evidence of the activity, are old. Accordingly, the Office of the General Counsel recommends that the Commission focus its efforts on cases involving more recent activity. Such efforts will also generate more impact on the current electoral process and are a more efficient allocation of our limited resources. To this end, this Office has identified 19 cases that

this Office believes are

now too old to warrant the use of the Commission's resources

¹ These matters are: MUR 4227 (Wellstone for Senate) (Attachment 1); MUR 4273 (Jesse Wineberry) (Attachment 2); MUR 4290 (Lincoln Club of Riverside County) (Attachment 3); MUR 4292 (Congressman Ron Packard) (Attachment 4); MUR 4293 (Willie Colon for Congress) (Attachment 5); MUR 4294 (Alan Keyes for President '96) (Attachment 6); MUR 4299 (UAW-V-CAP) (Attachment 7); MUR 4312 (Sonoma County Republicans) (Attachment 8); MUR 4316 (Ross Perot) (Attachment 9); MUR 4318 (Patrick Combs for Congress) (Attachment 10); MUR 4324 (Buchanan for President) (Attachment 11); MUR 4325 (Dan Giarstecki for Congress '96) (Attachment 12); MUR 4329 (Golden Door) (Attachment 13); MUR 4330 (Trice Harvey) (Attachment 14); MUR 4333 (WSB-TV) (Attachment 15); MUR 4334 (Cox Communications) (Attachment 16); MUR 4336 (WSB-TV) (Attachment 17); MUR 4339 (WSB-TV) (Attachment 18); MUR 4348 (Soglin for Congress) (Attachment 19); MUR 4339 (Francis Thompson for Congress) (Attachment 20); MUR 4360 (Weygand Committee) (Attachment 21); MUR 4363 (WSB-TV) (Attachment 22); MUR 4364 (Friends of Jimmy Blake) (Attachment 23) and Pre-MUR 328 (Department of the Interior) (Attachment 24).

Because our recommendation not to pursue these cases is based on their staleness, this Office has not prepared separate narratives for these cases. we have attached responses and referral materials in those instances where the information was not previously circulated. Attachments 26-45.

This Office recommends the Commission exercise its prosecutorial discretion and no longer pursue the cases listed below effective September 3, 1996. By closing the cases effective that day, CED and the Legal Review Team each will have the necessary time to prepare closing letters and case files for the public record.

20250407

III. RECOMMENDATIONS

A. Decline to open a MUR, close the file effective September 3, 1996, and approve the appropriate letters in the following matters:

- 1) Pre-MUR 293
- 2) Pre-MUR 311
- 3) Pre-MUR 328
- 4) RAD Referral 95L-03
- 5) RAD Referral 95L-11
- 6) RAD Referral 95L-16
- 7) RAD Referral 95L-22
- 8) RAD Referral 95NF-21

B. Take no action, close the file effective September 3, 1996, and approve the appropriate letters in the following matters:

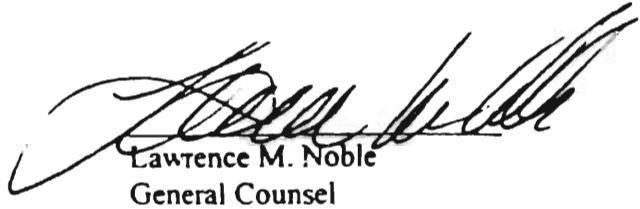
- 1) MUR 4061
- 2) MUR 4074
- 3) MUR 4101
- 4) MUR 4146
- 5) MUR 4151
- 6) MUR 4175
- 7) MUR 4180
- 8) MUR 4184
- 9) MUR 4198
- 10) MUR 4201
- 11) MUR 4227
- 12) MUR 4232
- 13) MUR 4273
- 14) MUR 4290
- 15) MUR 4292
- 16) MUR 4293
- 17) MUR 4294
- 18) MUR 4299
- 19) MUR 4312
- 20) MUR 4316
- 21) MUR 4318
- 22) MUR 4324
- 23) MUR 4325
- 24) MUR 4329
- 25) MUR 4330
- 26) MUR 4333
- 27) MUR 4334

6 2 4 7 4 5 2 3

- 28) MUR 4336
- 29) MUR 4339
- 30) MUR 4348
- 31) MUR 4359
- 32) MUR 4360
- 33) MUR 4363
- 34) MUR 4364

C. Take no further action, close the file effective September 3, 1996, and approve the appropriate letters in MUR 3826.

8/14/96
Date


Lawrence M. Noble
General Counsel

16045745254

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Enforcement Priority.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 21, 1996, the Commission took the following actions on the General Counsel's August 14, 1996 report on the above-captioned matter:

1. Decided by a vote of 5-0:

A. Decline to open a MUR, close the file effective September 3, 1996, and approve the appropriate letters in each of the following matters:

- 1) Pre-MUR 293
- 2) Pre-MUR 311
- 3) Pre-MUR 328
- 4) RAD Referral 95L-03
- 5) RAD Referral 95L-11
- 6) RAD Referral 95L-16
- 7) RAD Referral 95L-22
- 8) RAD Referral 95NP-21

B. Take no action, close the file effective September 3, 1996, and approve the appropriate letters in each of the following matters:

- 1) MUR 4062
- 2) MUR 4074
- 3) MUR 4101
- 4) MUR 4146
- 5) MUR 4151
- 6) MUR 4175
- 7) MUR 4180
- 8) MUR 4184
- 9) MUR 4198

(continued)

260474525

Federal Election Commission
Certification for Enforcement
Priority
August 23, 1996

Page 2

- 10) MUR 4227
- 11) MUR 4232
- 12) MUR 4273
- 13) MUR 4290
- 14) MUR 4292
- 15) MUR 4293
- 16) MUR 4294
- 17) MUR 4299
- 18) MUR 4312
- 19) MUR 4316
- 20) MUR 4318
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- 23) MUR 4329
- 24) MUR 4330
- 25) MUR 4333
- 26) MUR 4334
- 27) MUR 4336
- 28) MUR 4339
- 29) MUR 4348
- 30) MUR 4359
- 31) MUR 4360
- 32) MUR 4363
- 33) MUR 4364

Commissioners Aikens, Elliott, McDonald,
McGarry, and Thomas voted affirmatively with
respect to each of the above-noted matters.

Attest:

8-26-96

Date

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

Received in the Secretariat: Wed., Aug. 14, 1996 4:56 p.m.
Circulated to the Commission: Fri., Aug. 16, 1996 12:00 p.m.
Deadline for vote: Wed., Aug. 21, 1996 4:00 p.m.

bjr



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

SEP 06 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chris Georgacas, Chairman
Independent Republicans of Minnesota
480 Cedar Street, Suite 560
St Paul, MN 55101

RE: MUR 4227

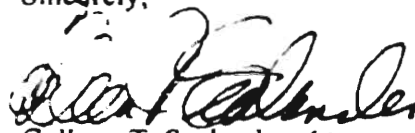
Dear Mr. Georgacas:

On June 26, 1995, 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 respondents. See attached narrative. Accordingly, the Commission closed its file in this matter on September 3, 1996. 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,


Colleen T. Sealander, Attorney
Central Enforcement Docket

Attachment
Narrative

MUR 4227
WELLSTONE FOR SENATE

Chris Georgacas, Chairman of Independent Republicans of Minnesota, filed a complaint alleging that the Wellstone for Senate Committee ("Wellstone Committee") and Senator Paul Wellstone accepted campaign contributions in excess of the contribution limits and failed to properly report debts during 1990-1991. He alleges that Mr. Dean Alger exceeded the Act's contribution limitations by contributing \$910 in funds and donating a bus, worth \$3,500, to the campaign. In the alternative, he alleges that the Wellstone Committee used the bus throughout the campaign, neither paying for it nor reporting any incurred any debt for using the bus. Following the election, the Wellstone Committee purchased the bus from Mr. Alger.

In response, the Wellstone for Senate Committee and Richard Kahn, as treasurer, state that in August 1990, the Wellstone Committee entered into a commercially reasonable lease agreement with Mr. Alger to use an old school bus. The lease required the Wellstone Committee to make certain lease payments to Mr. Alger subject to a right of set-off with respect to 75% of the cost of repairs to the bus. Mr. Kahn relays that the Wellstone Committee paid for repairs to the bus that significantly exceeded the expectations of both parties, and, as a result of the repair set-off, the Wellstone Committee owed nothing to Mr. Alger until December, 1990. At that time the Wellstone Committee incurred an unpaid lease obligation to Mr. Alger and because the amount was less than \$500 and less than 60 days old, it was not reported.

The amount of money involved in this matter is not substantial and there is no indication of any serious intent to violate the FECA.

96043 / 45200



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SEP 06 1996

Richard S. Kahn, Treasurer
Wellstone for Senate
P.O. Box 65588
St. Paul, MN 55165

RE: MUR 4227

Dear Mr. Kahn:

On June 30, 1995, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Wellstone for Senate and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter on September 3, 1996.

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 the Central Enforcement Docket at (202) 219-3400.

Sincerely,

Colleen T. Sealander, Attorney
Central Enforcement Docket

Attachment
Narrative

MUR 4227
WELLSTONE FOR SENATE

Chris Georgacas, Chairman of Independent Republicans of Minnesota, filed a complaint alleging that the Wellstone for Senate Committee ("Wellstone Committee") and Senator Paul Wellstone accepted campaign contributions in excess of the contribution limits and failed to properly report debts during 1990-1991. He alleges that Mr. Dean Alger exceeded the Act's contribution limitations by contributing \$910 in funds and donating a bus, worth \$3,500, to the campaign. In the alternative, he alleges that the Wellstone Committee used the bus throughout the campaign, neither paying for it nor reporting any incurred any debt for using the bus. Following the election, the Wellstone Committee purchased the bus from Mr. Alger.

In response, the Wellstone for Senate Committee and Richard Kahn, as treasurer, state that in August 1990, the Wellstone Committee entered into a commercially reasonable lease agreement with Mr. Alger to use an old school bus. The lease required the Wellstone Committee to make certain lease payments to Mr. Alger subject to a right of set-off with respect to 75% of the cost of repairs to the bus. Mr. Kahn relays that the Wellstone Committee paid for repairs to the bus that significantly exceeded the expectations of both parties, and, as a result of the repair set-off, the Wellstone Committee owed nothing to Mr. Alger until December, 1990. At that time the Wellstone Committee incurred an unpaid lease obligation to Mr. Alger and because the amount was less than \$500 and less than 60 days old, it was not reported.

The amount of money involved in this matter is not substantial and there is no indication of any serious intent to violate the FECA.

604520



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

SEP 16 1996

The Honorable Paul Wellstone
United States Senate
717 Hart Building
Washington, DC 20510

RE: MUR 4227

Dear Senator Wellstone:

On June 30, 1995, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against you. See attached narrative. Accordingly, the Commission closed its file in this matter on September 3, 1996.

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 the Central Enforcement Docket at (202) 219-3400

Sincerely,

Colleen T. Sealander, Attorney
Central Enforcement Docket

Attachment
Narrative

MUR 4227
WELLSTONE FOR SENATE

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In response, the Wellstone for Senate Committee and Richard Kahn, as treasurer, state that in August 1990, the Wellstone Committee entered into a commercially reasonable lease agreement with Mr. Alger to use an old school bus. The lease required the Wellstone Committee to make certain lease payments to Mr. Alger subject to a right of set-off with respect to 75% of the cost of repairs to the bus. Mr. Kahn relays that the Wellstone Committee paid for repairs to the bus that significantly exceeded the expectations of both parties, and, as a result of the repair set-off, the Wellstone Committee owed nothing to Mr. Alger until December, 1990. At that time the Wellstone Committee incurred an unpaid lease obligation to Mr. Alger and because the amount was less than \$500 and less than 60 days old, it was not reported.

The amount of money involved in this matter is not substantial and there is no indication of any serious intent to violate the FECA.

2694374522



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SEP 06 1996

Dean Alger
1496 W. Larpentur
St. Paul, MN 55113

RE: MUR 4227

Dear Mr. Alger:


On June 30, 1995, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against you. See attached narrative. Accordingly, the Commission closed its file in this matter on September 3, 1996.

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 the Central Enforcement Docket at (202) 219-3400.

Sincerely,


Colleen T. Sealander, Attorney
Central Enforcement Docket

Attachment
Narrative

MUR 4227
WELLSTONE FOR SENATE

Chris Georgakas, Chairman of Independent Republicans of Minnesota, filed a complaint alleging that the Wellstone for Senate Committee ("Wellstone Committee") and Senator Paul Wellstone accepted campaign contributions in excess of the contribution limits and failed to properly report debts during 1990-1991. He alleges that Mr. Dean Alger exceeded the Act's contribution limitations by contributing \$910 in funds and donating a bus, worth \$3,500, to the campaign. In the alternative, he alleges that the Wellstone Committee used the bus throughout the campaign, neither paying for it nor reporting any incurred any debt for using the bus. Following the election, the Wellstone Committee purchased the bus from Mr. Alger.

In response, the Wellstone for Senate Committee and Richard Kahn, as treasurer, state that in August 1990, the Wellstone Committee entered into a commercially reasonable lease agreement with Mr. Alger to use an old school bus. The lease required the Wellstone Committee to make certain lease payments to Mr. Alger subject to a right of set-off with respect to 75% of the cost of repairs to the bus. Mr. Kahn relays that the Wellstone Committee paid for repairs to the bus that significantly exceeded the expectations of both parties, and, as a result of the repair set-off, the Wellstone Committee owed nothing to Mr. Alger until December, 1990. At that time the Wellstone Committee incurred an unpaid lease obligation to Mr. Alger and because the amount was less than \$500 and less than 60 days old, it was not reported.

The amount of money involved in this matter is not substantial and there is no indication of any serious intent to violate the FECA.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4227

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