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August 3, 1998

Joel J. Roessner, Esq.
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Mr. Richard Morris (MURs 4407 and 4544)

Dear Mr. Roessner:

Corresponding to your July 21, 1998 letter, please find enclosed the following three items:

1. Mr. Morris' response submitted under oath;
2. The so-called agendas responsive to the document request;
and,
3. Supplemental answers to Interrogatories.

Very truly yours,


David Lenefsky

dl:tfd

ANSWER TO FEC INTERROGATORIES

1. Identify each and every person who has knowledge or information regarding the planning, organization, development, and/or creation of television, radio or print advertisements produced by SKO and paid for in whole or in part by the DNC.

Answer: myself, Bob Squier, Bill Knapp, Tom Ochs, the entire SKO staff, Mark Penn, Doug Schoen, Marius Penczner, Henry Sheinkopf, President Clinton, Vice President Gore, Douglas Sosnick, Harold Ickes, Evelyn Lieberman, Leon Panetta, Don Baer, Bill Curry, John Hilley, George Stephanopoulos, Maggie Williams, Erskine Bowles, Mike McCurry, Mickey Kantor, Henry Cisneros, Rahm Emanuel, Gene Sperling, Peter Knight, Ann Lewis, Sandy Berger, Tom Freedman, Mark Schwartz, Mary Smith, Brian Lee, Chris Dodd, the negative research staff of the DNC, Joe Lockhart, Jamie Sperling, Joe Sandler, Lynn Utrecht

2.paid for by any State Democratic Party

Answer: same as #1

3.produced by November 5 and paid for....by the DNC

Answer: same as #1

- 4.....produced by November 5 and paid forby state Democratic Party

Answer: same as #1

5. State the time and date of each meeting and telephone conversation during which there was any discussion of any kind concerning the planning, organization, development, and/or creation of television...advertisements.....

Answer: On every single day, with few or any exceptions, between May 1, 1995 and my departure from the campaign on August 28, 1996 I engaged in such discussions by telephone or in person. I engaged in weekly strategy meetings with the President and 17 others at the White House where these topics were always discussed and I also engaged in twice-weekly creative meetings at which they were discussed. I engaged in a daily conference call every day at 10AM concerning the advertising

- 5a Identify the location of the meeting and for telephone... the location of each participant

Answer: The strategy meetings were held in the White House residence. The creative meetings were held either at SKO's office or at the campaign headquarters. In the conference calls and other phone calls, I was at either my hotel - the Jefferson - or at the campaign headquarters or at my home in Redding or my apartment in New York City.

Sometimes I was at pay phones throughout the nation. I generally do not know the location of the other participants.

5b Identify each and every person who attended or participated in any meeting.

Answer:

Strategy Meetings -- President Clinton, Vice President Gore, myself, Bob Squier, Bill Knapp, Mark Penn, Doug Schoen, Douglas Sosnick, Harold Ickes, Evelyn Lieberman, Leon Panetta, Don Baer, John Hilley, George Stephanopoulos, Maggie Williams, Erskine Bowles, Mike McCurry, Mickey Kantor, Henry Cisneros, Peter Knight, Ann Lewis, Sandy Berger, Chris Dodd,

Creative Meetings: myself, Bob Squier, Bill Knapp, Mark Penn, Doug Schoen, Don Baer, Marius Penczner, Henry Sheinkopf, Bill Curry, various members of the SKO staff, Tom Freedman, Mark Schwartz, Mary Smith, Brian Lee, the negative research staff of the DNC, Joe Sandler

5c Describe the substance, decisions, discussion and details of each and every meeting.

Answer: For strategy meetings and creative meetings, it is impossible for me to describe each meeting since no notes were kept and I attended over 200 of them. At each meeting, we would review polling data, review focus group data, screen proposed ads and ad ideas, develop texts for ads, discuss the time buy, and plan our media strategy.

5d. Identify who produced specific advertisements

Answer: I do not know who was directly involved in the production of each ad. Squier, Knapp, Penczner, Sheinkopf, and members of the SKO staff were generally the ones who did the actual production.

5e. Identify each person or entity that paid for any ads.....

Answer: To my knowledge, the DNC, Clinton-Gore campaign, and various state parties

6. Identify each person from whom SKO purchased time....

Answer I don't know

7. Identify each person from whom Nov 5 purchased time...

Answer: I don't know

8. Identify each newspaper... where SKO purchased advertisements....

Answer: I don't know

9. Identify each newspaper... where Nov 5 purchased advertisements...

Answer: I don't know

10. Identify each person who has knowledge or information regarding the planning, organization, development and/or creation ofadvertisements produced by SKO and paid forby Clinton Gore

Answer: same as #1

11.....advertisements produced by Nov 5 and paid for...by Clinton Gore

Answer: same as #1

12. Identify each and every advertisement that SKO planned, organized, developed, and/or created for Clinton/Gore

Answer: I don't know

13.that November 5 planned.....

Answer: I don't know