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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

JUL 33 10 40 AM '99

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July 30, 1999

VIA UPS NEXT DAY & FACSIMILE

(202) 219-3923

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

Re: Cammermeyer 2 Congress and
Paul Fournier, as Treasurer
MUR 4753

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
AUG 2 10 40 AM '99

Dear Mr. Noble and Ms. Lerner:

This law firm is counsel to Cammermeyer 2 Congress
(Committee) and its treasurer, Paul Fournier, in this matter.

I. Introduction and Summary of Position

By letter dated July 7, 1999 and received by this law firm on July 9, 1999, the Commission's chair notified the Committee and Fournier of its determination that there is reason to believe that the Committee and Fournier may have violated the Federal Election Campaign Act of 1971 (Act) by failing to fulfill the statutory requirement that the treasurer use "best efforts" to obtain, maintain and submit the address, occupation and employer information for contributors. In particular, the letter asserted that the Committee may have failed to fulfill the requirements of 11 C.F.R. §104.7(b)(1) by failing to make at least one follow-up, stand-alone request for the missing information within 30 days of receipt of the contribution. The letter further asserted that the Committee may have failed to fulfill the requirements of 11 C.F.R. §104.7(b)(4) by not reporting the previously missing information by the date of the Committee's next report.

As we demonstrate below, the Committee had a system in place to make at least one follow-up, stand-alone request for the missing information within 30 days of receipt of the contribution. Once the first quarter report for 1998 was filed and the Committee

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discovered the sheer number of contributors who were not providing the required information, it hired an outside professional treasurer to assist it in complying with applicable disclosure requirements. These efforts resulted in the Committee's ability to report in its second and third quarter reports full information on 41 of the roughly 214 individuals for whom incomplete information was available at the time of the first quarter report.^{1/} Thereafter, the Committee, in December 1998, filed a report amending its first quarter report to provide the previously missing information. In these circumstances, the Committee and Fournier submit that, as to the 27 persons listed in the second quarter report, there can be no violation of any kind and, as to the balance, in light of the Committee's ongoing and diligent efforts to collect and report the information, it would not effectuate the purposes of the Act to impose a civil penalty in this case.

II. Statement of Facts

A. The Committee Had In Place an Adequate "Best Efforts" Procedure

Attached hereto are the declarations of: Monica Moe, campaign manager; Jeff Cook, a campaign fundraiser, who for a time served as finance director; and Christopher Mills, a campaign fundraiser.^{2/}

^{1/} According to the Factual and Legal Analysis by Commission staff (Factual and Legal Analysis at 4), there were 202 contributors for whom address, occupation and employer were not provided and 17 contributors for whom some, but not all of this information was provided. While it is a bit difficult to ascertain to which contributors the staff is making reference because none are named, it appears that this number is overstated by five. Due to slight variations in the name (e.g. Patricia L. Bolton submitted one check in her full name and one as P.L. Bolton) or typographical errors, Patricia L. Bolton, Nancy Davis, Gregory Hullender and Daniel Warn were each listed twice on the original report. Dr. Joyce Golding was listed on the report although she did not contribute more than \$200.

^{2/} Each of the declarations has been signed. Due to the shortness of the time within which to respond to this determination, the copies of the declarations enclosed contain a signature transmitted by facsimile. Original signature pages will be forwarded once this firm receives them.

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As these declarations make clear, the Committee was aware of the requirement under federal law that for contributions in excess of \$200 per calendar year, a campaign must obtain the contributor's name, mailing address, employer name and occupation, and had an extensive staff involved in its efforts to comply with the Act. Julie Klein was the finance director from January through sometime in March 1998 [Moe Declaration at 1]. Jeff Cook, was the call-time manager from January through sometime in June 1998, and the finance director from April through sometime in June 1998 [*id.*]. Christopher Mills was the special events/direct mail solicitation manager from January through September 1998 [*id.*]. Stephanie Rowe was a clerical charged with data entry and follow-up responsibilities for campaign contributions [*id.* at 2]. During the first quarter of 1998, each of these individuals was charged with responsibility for obtaining contributor information [Moe decl. at 1; Cook decl. at 2; Mills decl. at 2-3]. Thereafter, in about June of 1998, the Committee made Jennifer Cless its campaign finance director [Moe decl. at 1].

As is the case with many campaigns, the Committee originally did not require any formal procedures for keeping track of contributions. Cammermeyer, the candidate, would call contributors and Cook would immediately send the contributor by facsimile and, the next day, by mail a thank you note containing a notice advising the contributor of the requirement to report the contributor's name, address, occupation and employer [Cook decl. at 5-6]. Thereafter, Cook would enter the information received from contributors into his computer database and run that information out weekly for the Committee to use in monitoring its compliance with information collection requirements under the Act and in preparing its campaign reports [Cook decl. at 3].

As the first quarter of 1998 progressed, the Committee's fundraising efforts became more complex. There was telephonic solicitation of contributions by the candidate and campaign staff; there was a mail solicitation effort and funds were raised through special events. Contributions were received by Paul Fournier, the campaign's treasurer, who would pass them along to Moe for review and copying [Moe decl. at 2]. Information from contributors' checks and contribution forms^{3/} was entered into a computer database to allow the Committee to track contributors and maintain contributor information [*id.*]. From January through mid-February 1998, Moe would make a copy of the contributor checks and forms and herself input the information into the database about the contributors, including name, address, employer, and occupation.

^{3/} A copy of the two solicitation forms are attachments 1 and 2 to Moe's letter to the Commission dated June 19, 1998.

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From mid-February through the end of the first quarter reporting period in 1998, Stephanie Rowe would perform the data entry under Moe's supervision [id.].

The information in this database was used to generate thank you letters to contributors soliciting contributor information [Moe decl. at 2 & 3]. When Moe performed the data entry, thank you letters were mailed within one or two days of receipt of contributions [Moe decl. at 2]. When Stephanie Rowe began performing these duties, letters were mailed within five days [Moe decl. at 2-3]. The thank you letters contained a notice in the body and on the bottom advising contributors that federal law required the reporting of a contributor's name, address, occupation and employer for contributions over \$200.^{4/}

To track contributions for which the Committee did not have the required information, Moe would run a weekly database access sort for entries with missing information [Moe decl. at 3; Cook decl. at 3; Mills decl. at 3]. Based upon this computerized search, the Committee would mail out form response letters to contributors requesting the required information and enclosing a pre-addressed envelope [Moe decl. at 3]. The Committee's general practice was to mail out such letters within one week from receipt of the contribution, but, on occasion, some form response letters were sent out two to three weeks following receipt [Moe decl. at 3; Cook at 4]. None was sent out more than three weeks after receipt of the contribution [Moe decl. at 3; Cook decl. at 4].^{5/}

^{4/} A copy of the form letter is attachment 3 to Moe's letter to the Commission dated June 19, 1999, and is exhibit 1 to Moe's declaration.

Commission staff apparently misunderstood the date on this letter [see Factual and Legal Analysis at 3 n. 3], and assumed this date bore some relation to the date on which the letter was created. However, the form is computer generated and contains a computer "macro" (or imbedded command) which imprints the date on which the letter is generated on the top of the letter. Thus, the date on the form letter--June 19, 1999--reflects the date the sample was printed on the computer, not the date it was created.

^{5/} With respect to fundraising events, the Committee ordinarily obtained missing contributor information from members of the host committee, rather than contacting the contributor directly [Mills decl. at 3]. In those circumstances in which the host committee could not provide the requested information, the Committee would send its form solicitation letter with enclosed pre-addressed
(continued...)

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With respect to contributions for which the Committee did not have an address, a campaign staffer was assigned to call the contributor [Moe decl. at 4; Cook decl. at 4]. In the phone call, the staffer thanked the contributor for the contribution and requested that the contributor provide the required information either by phone or by facsimile [Moe decl. at 4; Cook decl. at 4]. If no one answered the telephone call, the staffer left a message requesting the information and would "flag" the item for a follow-up call [Cook decl. at 4].

For those contributions for which the Committee did not have either a phone number or mailing address, it would assign a staffer to search telephone directories or the internet for the contributor's name and then to follow the procedure outlined above to obtain the required information [Moe decl. at 4; Cook decl. at 5].

B. After the First Quarter 1998 Report, the Committee Augmented Its Reporting Efforts

After filing the report for the first quarter of 1998, the Committee saw that despite its diligent efforts, it was missing contributor information for a large number of contributors. Accordingly, it determined that it needed to enlist additional assistance with its campaign reporting efforts. As a result, at additional cost, the Committee retained the services of an outside professional treasurer, Kinde Durkee. Ms. Durkee relieved the Committee of many of the clerical and bookkeeping tasks associated with reporting, allowing the Committee to concentrate on following up with contributors. In addition, Ms. Durkee also kept lists of which contributors were missing information, thus providing a method for double checking the Committee's records concerning which contributors still needed to provide information.

With the addition of Ms. Durkee to the team, the Committee, either through Ms. Moe, the campaign finance director (either Mr. Cook or Jennifer Cless, who replaced Cook as finance director in about June 1998) or Ms. Durkee, was in constant contact with Commission Reports Analyst Adam Ragan regarding the Committee's reporting obligations.^{5/}

^{5/} (...continued)
envelope within two to three weeks of the contribution date [id.].

^{6/} The Committee and Fournier request that the General Counsel's office contact Mr. Ragan to verify this fact.

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Thereafter, beginning in about mid-May 1998, the Committee began another concentrated series of contacts with contributors for whom information was missing [see Letter from Moe to the Commission dated June 19, 1998].^{7/}

C. The Committee Provides Supplemental Data on Its Donors

As time went by, the Committee gathered and reported the required information. Thus, in its second quarter report, the Committee reported, in full compliance with 11 C.F.R. §104.7(b)(4), the information for 27 of the contributors for whom incomplete information was available at the time of the original report.^{8/}

In its third quarter 1998 report, the Committee provided such information for 14 more.^{9/}

7/ Commission staff apparently misunderstood Moe's June 19, 1998 letter to mean that "best efforts" to locate missing contributor information were commenced in mid-May 1998 in response to the Elvig complaint [see Factual and Legal Analysis at 3]. Rather than indicating that the Committee in mid-May, for the first time, was initiating efforts to obtain missing information from contributors, Moe's letter was intended to convey the extra or supplemental efforts the Committee was taking to obtain the missing information [see Moe letter at 1 (first outlining the Committee's existing contributor information practices and then identifying new supplemental steps undertaken by the Committee, including additional follow up calls, facsimiles and letters and the hiring of a professional treasurer) and at 2 (summarizing the letter by saying, "we have made a concerted 'best effort' to collect the information for our Report. As well . . . , we will continue to make those efforts until the information is complete.")].

8/ These are: Bob Bruneau; Emily Clark Hewitt; Whitney Davis; Jennifer Devine; Barbara Dobson; Douglas Exworthy; Laureen France; Darcie Furlan; William Gilmer; Stephen Herbits; Barbara Jirsa; Judith Kolstad; William Mantle; Cynthia McLachlan; David Neth; Mary Newcombe; Valere Scott; Robert Sertner; Lee Smith; Wayne Smith; Patricia Sparks; Jack Spitzer; Joseph Steffan; Frank Steffes; George Strode; Bryant Vehrs; and Peter Wilson.

9/ These are: Margaret Adam; Alvin Baum; Todd Bitts; Jonathon Bridge; Candace Carrol; Robert Eichler; Julianne Johnson; Andrew Linsky; Gary Patterson; Susanne Poppema; Barry Skovgaard; Henry Van Amerigen; Barbara Wechsler; and Rick Zbur.

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After months of diligent effort, the Committee, in December 1988, filed an amended report for the first quarter of 1998 adding the missing contributor information.

This amendment was later supplemented in April 1999.

These efforts not only demonstrate the Committee's ongoing efforts, but also demonstrate that any failure to obtain and report information was the result of the Committee's difficulty in obtaining the required information from contributors--not any effort by the Committee to evade the Act or any negligence on the part of the Committee in its efforts to comply therewith.

III. Conclusion

For the foregoing reasons, the Committee and Fournier request that the Commission acknowledge that, in light of the Committee's ongoing and diligent efforts to obtain the information required by the Act, its provision of required information in a timely manner as to 27 of the 214 of the contributors at issue, and its ultimate success in locating and reporting the previously missing information, it would not effectuate the purposes of the Act to impose a civil penalty in this case notwithstanding that the amendment containing the bulk of the previously missing information apparently was filed in December--rather than with the next regular report in July--1998.^{10/}

^{10/} The Commission's records show that the only amendments to the first quarter reports were filed in October 1998 (relating to an error in the summary page) and December 1998, which is the amendment including the previously missing contributor information. The Committee is verifying whether this comports with its records.

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Due to the time-sensitive nature of this matter, my clients hereby request that you directly send them copies of any correspondence to me.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Laurence S. Zakson". The signature is fluid and cursive, with the first name "Laurence" being more prominent and the last name "Zakson" following in a similar style.

Laurence S. Zakson
of REICH, ADELL, CROST & CVITAN

LSZ/caw

63912.02

DECLARATION OF JEFF COOK

I, Jeff Cook, declare as follows:

1. [Identification] I worked for the Cammermeyer 2 Congress (Cammermeyer) campaign from approximately January to June 1998.

2. [Position and duties] During the period from January through March 1998, I was the call-time manager. As the call-time manager, I was in charge of developing lists of possible target contributors, specifying solicitation amounts, and keeping track of all telephone solicitation contributions. I was supervised by Monica Moe, the campaign's manager, and Julie Klein, the campaign's finance director. Sometime in March 1998, Julie Klein stepped down and I assumed the duties of finance director until I departed in June. As finance director, I supervised the call-time, mail, and special events contributions solicitations.

3. [Prior background] I have performed similar fund-raising work on several campaigns both before, and since, working for Cammermeyer. Based upon my experience, I am familiar with the requirement under federal law that for contributions of \$200 or more, a campaign must obtain a contributor's name, mailing address, employer name and occupation.

4. [Form response letter] As a result of my campaign experience and knowledge of the rules requiring this information, I have developed a form response letter for use in the various campaigns in which I have participated. The letter thanks the contributor for the contribution, asks the contributor to provide a name, address, employer name, and occupation, specifies that the information is required under the election laws, and provides a detachable section with blanks for contributors to fill-in the required information. I developed and began using the form response letter prior to working on the Cammermeyer campaign. A copy of the form response letter is attached as Exhibit 1.^{1/} My practice has been to modify my previous form by changing the candidate name for each new campaign in which I participate. I followed this practice on the Cammermeyer campaign.

5. [Receipt and review of contributions] During my work with the Cammermeyer campaign, contributions were initially received by Paul Fournier, who dropped off checks generally with Monica Moe and sometimes with me. Moe would distribute the contributions to Mills and me depending upon whether it was call-generated or mail-generated. When Fournier left the mail with me, Mills and I divided up the checks as either mail-generated or call-generated. We would make copies of the contribution checks and at least I would input relevant information from the

^{1/} The copy is a print-out of my current computer version which was modified for a Pennsylvania state election.

contributions into my computer database. My practice has been to copy the checks onto a form that reminded me of the required information. A copy of this form is attached as Exhibit 2. It was also my practice to generate a weekly report of call-time contributions from the information in my computer database. The report included entries for a contributor's name, address, employer, occupation, as well as other information, and allowed me to track those contributions for which we did not yet have the required information.

6. [Response to contributors] The campaign maintained a separate database that was used to generate thank you cards and form response letters. All contributors were sent a thank you card for their donations. All campaign material, including the thank you card, were on letterhead that contained a notice on the bottom advising contributors that federal law required the reporting of a contributor's name, address, occupation and employer for contributions over \$200. The campaign included with all solicitation letters a remittance envelope which also contained the same notice, as well as blank spaces to fill-in employer, address, and other information. This remittance envelope was pre-addressed to the Cammermeyer campaign.

7. [Search for required information] For those contributions for which we did not have all the required information, we mailed the form response letter identified above

along with a pre-addressed campaign envelope. These form response letters generally were mailed within about one week from receipt of a contribution. However, some form response letters may have been sent out two to three weeks following receipt if the campaign was very busy. None was sent out more than three weeks after receipt of contributions. From January until March 1998 when I was call-time manager, I was responsible for insuring that the form response letters were generated and mailed for all call-time contributions. When I assumed the finance director position, I was responsible for insuring that the form response letters were generated and mailed for all contributions. The letters were generated from the campaign's database by either Stephanie Rowe, Monica or me, depending upon whether the contributions were received in early on (January) or later in the reporting period (mid-February through the end of March).

For contributions for which we did not have an address, someone from the campaign, usually Stephanie Rowe or I, would call the contributor. In the phone call, we would thank the contributors for the contribution and request that he or she provide the required information either by phone or by facsimile. If nobody answered the phone call, we would leave a message requesting the same information and flag the item for further follow up. From January until March 1998 when I was call-time manager, I was responsible for insuring that the calls were made for all call-time contributions. When I assumed the finance director position, I was responsible for insuring that these

calls were made for all contributions. To my knowledge, this procedure was invariably followed as to each donation.

For those contributions for which we did not have either a phone number or mailing address, we would use resources such as the phone book or internet to search for the contributors and then follow the procedure outlined above to obtain the required information.

8. [Early contributions] During January and the first part of February, contributions were coming in at a slower pace than from mid-February forward. During this time, thank you cards and form response letters for call-generated contributions most likely were generated from my database, rather than the campaign's database. For example, I remember early on sitting with Cammermeyer as she solicited contributions. I provided her with a "call sheet" which identified the required information. A copy of my computer version of the "call sheet" is attached as Exhibit 3. When Cammermeyer received a contribution commitment, I would generate a facsimile thank you letter off of my computer which contained the notice of the required information. I then would send the letter by facsimile and mail to the contributor that same day. Because the facsimile thank you letter requested the required information, it made it easier to keep track of the required information when contributors returned the letter with their contributions. Because I simply "wrote over" the previous facsimile thank you letter, I have no way of producing a copy of

each letter. As with my form response letter, I only have the last letter available for print out.

9. [Supervision] Contributions were reviewed weekly by Julie Klein and Monica Moe. At the meetings to conduct these reviews and as we worked throughout any given week, Klein or Moe would inquire of me regarding the status of the search for the required information. Based upon these inquiries and my understanding of the need to obtain the required information, I would conduct calls to follow-up either the form response letter or telephone call. When I was too busy to make the follow-up calls myself, I would assign the task to another member of the campaign.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 29 day of July, 1999, at Philadelphia, Pennsylvania.


JEFF COOK

«SAL» «FNAME» «LNAME»
«ADDRESS1»
«ADDRESS2»
«ADDRESS3»
«CITY», «STATE» «ZIP»

Dear «FNAME»,

I just wanted to write you a quick note to thank you for your generous contribution to my campaign. I did, however need to request some additional information from you.

Pennsylvania state law requires that campaigns report the name, address, occupation and employer of all contributors. Please fill in and return the form below to our fax number (215) 538-3513.

Thank you for your assistance in this matter.

Sincerely,

Jeff Cook
Finance Director

Name:

Address:

Employer:

Occupation:

Exhibit 1

NAME: _____

Address: _____

Employer: _____

Occupation: _____

Source: _____

Date Rcvd: _____

Exhibit 2

Barlow for Congress

Name: «FNAME» «LNAME»

WPhone: «WPHONE»

Address: «ADDRESS1»

HPhone: «HPHONE»

«ADDRESS2»

Employer: «EMPLOYER»

«ADDRESS3»

Occu: «OCCUPATON»

«CITY», «STATE» «ZIP»

Fax: «FAX»

Notes: «NOTES»

Past Contributions: «DONOR_HISTORY»

Barlow '98: «AMOUNT_YTD»

Date: _____	LM: _____	CC: _____	CB: _____
Date: _____	LM: _____	CC: _____	CB: _____
Date: _____	LM: _____	CC: _____	CB: _____
Date: _____	LM: _____	CC: _____	CB: _____
Date: _____	LM: _____	CC: _____	CB: _____

TB Sent: Letter: _____

Fax: _____

Invite: _____

Other: _____

Exhibit 3

DECLARATION OF MONICA MOE

I, Monica Moe, declare as follows:

1. [Identification] I worked as the campaign manager for the Cammermeyer 2 Congress (Cammermeyer) campaign.

2. [Duties and personnel] As the campaign's manager, part of my work involved supervising the work of the finance director, the call-time manager, the special events/direct mail solicitation manager, and the various campaign staffers that provided support to these positions. Julie Klein was the finance director from January through sometime in March 1998. Jeff Cook, was the call-time manager from January through sometime in June 1998, and the finance director from April through sometime in June 1998. Christopher Mills was the special events/direct mail solicitation manager from January through September 1998. Sometime in late April or early May 1998, we hired Jenn Cless who eventually became the finance director in June 1998.

3. [Knowledge of required information] Because of my previous fundraising experience, I was aware of the requirement under federal law that for contributions of \$200 or more, a campaign must obtain a contributor's name, mailing address, employer name and occupation. My job duties included insuring that this information was obtained, and provided to the Federal

Election Commission (FEC), as required by law.

4. [Campaign procedure for reviewing contributions]

During the first quarter of 1998, the campaign had a procedure in place for receiving and reviewing contributions which allowed us to track contributions so that contributors timely received a thank you card and so that the required information was obtained for reporting to the FEC. Contributions were received by Paul Fournier, the campaign's treasurer, who would pass them along to me for review and copying by Jeff Cook and Christopher Mills.

Information from contribution checks was entered into a computer database to allow us to track contributions. From January through mid-February 1998, I would make a copy of the contribution checks and input into this database relevant information from the contributions, including a contributor's name, address, employer, occupation, as well as other information. From mid-February through the end of the first reporting period in 1998, Stephanie Rowe would perform the data entry under my supervision. From approximately June 1998 until the end of the campaign, Stephanie Rowe performed data entry under Cless' supervision.

The information in this database was used to generate thank you cards for contributors. When I performed the data entry, my practice was to generate the thank you cards within one or two days of receipt of contributions. When Stephanie Rowe took over this work, her turn-around time was approximately three to five

days. All campaign material, including the thank you card, were on letterhead that contained a notice on the bottom advising contributors that federal law required the reporting of a contributor's name, address, occupation and employer for contributions over \$200.

5. [Form response letter] To track contributions for which we did not have the required information, I would run a database access sort for entries with missing information. Based upon this access sort, we would mail-out form response letters to contributors requesting the required information. The form response letter was developed by Jeff Cook. A sample copy of the form response letter is attached as Exhibit 1. It thanks the contributor for the contribution, asks the contributor to provide a name, address, employer name, and occupation, specifies that the information is required under the election laws, and provides a detachable section with blanks for contributors to fill-in the required information. This form response letter was sent with a pre-addressed campaign envelope.

Jeff Cook, Julie Klein and I supervised the mailing of form response letters which generally were mailed within about one week from receipt of a contribution. I recall Jeff Cook occasionally reporting to me that some form response letters may have been sent out two to three weeks following receipt if the campaign was very busy, but that none was sent out more than three weeks after receipt of contributions. While Klein was the

finance director, Cook and I were each responsible for insuring that the form response letters were generated and mailed for call-time and special events contributions, respectively. Usually, Stephanie and I would actually stuff the envelopes and mail out the letters. When Cook took over as finance director, he took over supervision of mailing out form response letters for all contributions, and Stephanie mainly stuffed the envelopes and mailed out the letters.

For contributions for which we did not have an address, someone from the campaign was assigned to call the contributor. In the phone call, the contributor was thanked for the contribution and requested to provide the required information either by phone or by facsimile. If nobody answered the phone call, a message was left requesting the same information. The calls were either made and/or supervised by Cook, Mills, Stephanie or me.

For those contributions for which we did not have either a phone number or mailing address, we would search phone books or the internet for the contributors and then follow the procedure outlined above to obtain the required information.


6. [Early contributions] Cook and Mills also would make copies of the contribution checks generated by their respective programs. Cook would input information from the contributions into a computer file while Mills usually utilized a campaign staffer to input the information into a computer file. Cook also

used his computer file to generate a weekly report on call-time contributions. I am aware that early on, roughly January through no later than mid-February, Cook generated thank you letters and form response letters utilizing his individualized database. This was a time when contribution flows were slower than from mid-February forward when contribution flow increased dramatically.

7. [Supervision] Because both Cook and Mills had previous fundraising experience, my supervision usually involved periodically reviewing with them the report of contributions, checking on the status of our information at weekly meetings, and making ad-hoc inquiries. From these inquiries, Cook and Mills would advise if follow-up calls were needed for either the form response letter or telephone call.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 29 day of July, 1999, at Seattle, Washington.



MONICA MOE

attachment 3



June 19, 1998

Name
Address
City, State Zip

Dear

Thank you for your generous contribution to my campaign. As you know, my efforts to run this campaign would not be possible without support from loyal contributors like you.

Each individual whose contribution exceeds \$200 to my campaign is required by law to disclose name, complete address, occupation and employer for the Federal Election Commission reports. Please include this information on your remit or in a separate letter if needed.

In an effort of this magnitude, early contributions and support from loyal individuals like you are some of the most important we will receive. I want to thank you again for your continued support.

If you have any questions regarding the campaign, please feel free to contact me at 425-423-9726.

Sincerely,

Dr. Grethe Cammermeyer

Paid for and authorized by Cammermeyer 2 Congress
Federal law requires the reporting of name, address, occupation, and employer of all persons whose contributions aggregate over \$200 in a calendar year. Corporate contributions are not allowed.
Contributions are not tax deductible.

DECLARATION OF CHRISTOPHER MILLS

I, Christopher Mills, declare as follows:

1. [Identification] I worked for the Cammermeyer 2 Congress (Cammermeyer) campaign from approximately January to late September 1998.

2. [Position and duties] I was the campaign's finance manager in charge of special events and direct mail solicitation. As the special events manager, I would plan and coordinate special events with various host committees. There were several special events which occurred during the first quarter of 1998. I also conducted approximately four direct mail solicitations during the first quarter of 1998, the first was mailed out sometime in the second or third week of January.

3. [Knowledge of required information] The campaign advised me, and I was aware, of the requirement under federal law that for contributions of \$200 or more, a campaign must obtain a contributor's name, mailing address, employer name and occupation.

4. [Special events contributions] In the context of coordinating special events with the various host committee, I would advise them of the need for the required information for

for contributions of \$200 or more. When I arrived prior to a special event and met with the host committee, they would provide me with a list of contributors that included the required information. Upon completion of the event, the committee would give to me the contribution checks from the event. I would make a copy of the checks then turn them, and the list over to Stephanie Rowe, a campaign staffer who would input relevant information from the contributions into a computer database. Special events' contributions that arrived by mail were routed to me either by Monica Moe, the campaign manager, or Jeff Cook.

5. [Direct mail contributions] The contributions received from my direct mail solicitations were routed to me by Moe or Cook. As with the special events contributions, I would make a copy of the checks then turn them over to Stephanie Rowe who would input relevant information from the contributions into a computer database. The information in this database was used to generate thank you cards for, and requests for information from, contributors.

6. [Response to contributors] All contributors were sent a thank you card for their donations. For special events and direct mail contributions, either Monica Moe or Julie Klein, the campaign's finance director, directed a staffer to mail out the thank you cards. All campaign material, including the thank you card, were on letterhead that contained a notice on the bottom

advising contributors that federal law required the reporting of a contributor's name, address, occupation and employer for contributions over \$200. The campaign included with all solicitation letters a remittance envelope which also contained the same notice, as well as blank spaces to fill-in employer, address, and other information. This remittance envelope was pre-addressed to the Cammermeyer campaign.

7. [Follow-up procedure for incomplete information]

Either Moe or Klein would advise me on an ad hoc, usually weekly, basis of contributions for which we were missing required information. It was my understanding that Klein was working off a weekly report of contributions which was generated from the data entry performed by Stephanie Rowe. For special events contributions, I first would contact the head of the host committee directly to obtain the information because they generally knew the contributors from their event. I usually made this call within one week of an event, and I generally was able to obtain the information from the head of a host committee most of the time. If he/she did not have the information readily available, I would get a call back within a day or two. In March, I was traveling extensively with Cammermeyer for several special events, and my follow-up would take two to three weeks. Also, I would use campaign staffers to assist me with the follow-up procedure during this time.

For special events contributions for which I was not able to

obtain the information from the host committee by telephone and for direct mail contributions for which we lacked the required information, the campaign used the following procedure. The campaign sent out a form response letter developed by Jeff Cook. The letter thanks the contributor for the contribution, asks the contributor to provide a name, address, employer name, and occupation, specifies that the information is required under the election laws, and provides a detachable section with blanks for contributors to fill-in the required information. This form response letter was sent with a pre-addressed campaign envelope. The form response letters generally were mailed within about one or two weeks from receipt of a contribution. A campaign staffer was responsible for mailing the form response letter to the special events and direct mail contributors under the supervision of either Monica Moe, Julie Klein or me.

For contributions for which we did not have an address, a campaign staffer would call the contributor. In the phone call, we would thank the contributors for the contribution and request that he or she provide the required information either by phone or by facsimile. If nobody answered the phone call, we would leave a message requesting the same information and flag the item for further follow up. To my knowledge, this procedure was invariably followed as to each donation.

For those contributions for which we did not have either a phone number or mailing address, we would use the phone book or internet to search for the contributors and then follow the

procedure outlined above to obtain the required information.

8. [Supervision] I was supervised by Julie Klein and Monica Moe. As we worked throughout any given week, Klein or Moe would inquire of me regarding the status of the search for the required information. Based upon these inquiries and my understanding of the need to obtain the required information, either I or a campaign staffer would conduct calls to follow-up either the form response letter or telephone call.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 29 day of July, 1999, at Seattle, Washington.


CHRISTOPHER MILLS