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FEC 9-21-77

videotape submitted with complaint will be available upon request from the Commission



WASHINGTON, D.C. 20463

May 15, 1986

Elliott Schulder, Esquire Covington and Burling 1201 Pennsylvania Avenue, N.W. P.O. Box 7566 Washington, D.C. 20044

RE: MUR 1748
National Congressional
Club and Carter Wrenn,
as treasurer
Helms for Senate and
Mark L. Stephens, as
treasurer

Dear Mr. Schulder:

Based on a complaint filed with the Commission on July 30, 1984, and information supplied by your client the Commission determined on November 27, 1984 and April 23, 1985, that there was reason to believe that your clients had violated 2 U.S.C. \$\$ 434, 441a(a)(2)(A) and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter. However, after considering the circumstances of this matter, on May 13, 1986, the Commission determined to take no further action and close the file.

The file in this matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to Eric Kleinfeld, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Charles N. Steele

General Counsel

BY:

Associate General Counsel

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WASHINGTON, D.C. 20463

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General Counse

BY:

Associate General Counsel

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WASHINGTON, D.C. 20463

Mr. David E. Price
Executive Director
North Carolina Democratic Party
P.O. Box 12196
Raleigh, North Carolina 22605-2196

RE: MUR 1748

Dear Mr. Price:

The Federal Election Commission has reviewed the allegations of your complaint dated July 26, 1984 and determined that on the basis of the information provided in your complaint and information provided by the Respondents there was reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") has been committed. However, after considering the circumstances of this matter, the Commission on , 1986, has determined to take no further action and close the file. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
General Counsel's Report

RIA



WASHINGTON, D.C. 20463

Elliott Schulder, Esquire Covington and Burling 1201 Pennsylvania Avenue, N.W. P.O. Box 7566 Washington, D.C. 20044

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Sincerely,

Charles N. Steele

General Counsel

BY: Kenneth A. Gross

Associate General Counsel

Enclosure
General Counsel's Report



FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

May 15, 1986

Elliott Schulder, Esquire Covington and Burling 1201 Pennsylvania Avenue, N.W. P.O. Box 7566 Washington, D.C. 20044

> RE: MUR 1748 National Congressional Club and Carter Wrenn, as treasurer Helms for Senate and Mark L. Stephens, as treasurer

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Sincerely,

Charles N. Steele

General Counse

Associate General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

National Congressional Club)
Carter Wrenn, treasurer)
Helms for Senate)
Mark L. Stephens, treasurer)

MUR 1748

CERTIFICATION

I, Mary W. Dove, recording secretary for the Federal Election Commission executive session of May 13, 1986, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1748:

- Take no further action against the National Congressional Club and Carter Wrenn, as treasurer, for violations of 2 U.S.C. § 441a(a)(2)(A) and § 441a(f);
- Take no further action against the National Congressional Club and Carter Wrenn, as treasurer for violations of 2 U.S.C. § 434(b)(2)(D) and § 434(b)(4)(H)(i);
- 3. Take no further action against Helms for Senate and Mark L. Stephens, as treasurer, for violations of 2 U.S.C. § 441a(a)(2)(A) and § 441a(f);
- 4. Take no further action against Helms for Senate for violations of 2 U.S.C. § 434(b)(2)(D) and § 434(b) (4)(G);
- 5. Approve the letters attached to the General Counsel's signed Report of May 7, 1986.
- 6. Close the file.

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

Attest:

5-15-86 Date

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Mary W. Dove
Administrative Assistant

BEFORE THE FEDERAL ELECTION COMMISSION

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In the Matter of

National Congressional Club Carter Wrenn, treasurer Helms for Senate Mark L. Stephens, treasurer MUR 174885 MAY 7 P5: 10

SENSITIVE EXECUTIVE SESSION MAY 1 3 1986

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On November 27, 1984, the Federal Election Commission

(hereinafter "Commission") determined there was reason to believe that the National Congressional Club (hereinafter "NCC") and Carter Wrenn, as treasurer, violated 2 U.S.C. \$ 441a(a)(2)(A) by making an excessive contribution to the Helms for Senate Committee (hereinafter "Helms Committee"). The Commission also determined there was reason to believe that the Helms Committee and Mark L. Stephens, as treasurer, violated 2 U.S.C. \$ 441a(f) by accepting an excessive contribution from NCC. These determinations were based on allegations contained in a complaint filed by the Democratic Party of North Carolina.

After additional factual information was brought to the Commission's attention, the Commission, on April 23, 1985, determined there was reason to believe that NCC and Carter Wrenn, as treasurer, violated 2 U.S.C. § 44la(f) by accepting an excessive contribution from the Helms Committee and §§ 434(b)(2)(D) and 434(b)(4)(H)(I) by failing to report the contributions to and from the Helms Committee. The Commission, also on April 23, 1985, determined there was reason to believe that the Helms Committee and Mark L. Stephens, as treasurer, violated 2 U.S.C. § 44la(a)(2)(A) by making excessive

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contribution to NCC and \$\$ 434(b)(2)(D) and 434(b)(4)(G) by failing to report contributions to and from NCC.

On June 19, 1985, after denying respondents' request to consolidate this matter with Matter Under Review 1792, the Commission authorized an Order and Subpoena with questions and provests for degree to dispersely toward respondents.

consolidate this matter with Matter Under Review 1792, the
Commission authorized an Order and Subpoena with questions and a
request for documents directed toward respondents. The
Commission received a response on July 15, 1985. Because this
response necessitated that further information be obtained, the
Commission sent additional questions and a request for documents
on September 19, 1985. The Commission did not receive responses
until November 27, and December 2, 1985.

II. LEGAL ANALYSIS

This matter involves the production and broadcast of a television commercial, "Americans for Reagan," in which Senator Helms appears on President Reagan's behalf. According to respondents, the actual production work on the commercial was subcontracted by Jefferson Marketing, Inc. (hereinafter "JMI") to three vendors: Castellanos and Co., Cinema Sound, Ltd., and Audiofonics, Inc. The production cost of the commercial was \$3,877.26. Apparently this amount was paid entirely by NCC which indicated that it had had the commercial produced without consultation of any sort with officials of the Helms Committee. However, at a point subsequent to production but before broadcast, NCC recognized that the television commercial benefitted Senator Helms as well as President Reagan.

Accordingly, NCC allocated an equal portion of the production costs to the Helms Committee, even though the ostensible purpose

of the ad was NCC's own independent expenditure project on behalf of President Reagan.

In response to the Commission's questions JMI indicated that, although it "charged" \$300 for services provided in connection with the ad's production, "it did not bring this \$300 charge to NCC's attention at the time NCC allocated the production costs" between it and the Helms Committee.

In addition to production services, JMI was also the media time buyer for the Americans for Reagan advertisement. NCC and the Helms Committee jointly purchased \$57,325 of broadcast time from television stations reaching a North Carolina audience. 1/ Time was purchased from twenty-two stations. 2/ JMI has informed the Commission that to pay for the total buy, \$27,705 was withdrawn from JMI's "NCC advertising escrow account" and \$29,620 was withdrawn from JMI's "Helms for Senate advertising escrow account." NCC has also informed the Commission that in order to achieve a final 50/50 allocation of media costs, it will remit \$957.50 to JMI's "NCC advertising escrow account," and will then instruct JMI to credit its "Helms for Senate advertising escrow account" for the same amount. The resulting final allocation will be \$28,662.50 for NCC and \$28,662.50 for the Helms Committee.

^{1/} A portion of the media time buy (\$14,745) consisted of time purchased by the Helms Committee prior to the decision to jointly buy time for the Americans for Reagan advertisement. JMI did not notify NCC of the actual final cost of the media time buy until the preparation of the November 27, 1985 affidavit of Carter Wrenn for this MUR.

^{2/} The commercial was also aired on six stations not reaching a North Carolina audience at a cost of \$5,825. This amount was paid entirely by NCC.

JMI answered the remainder of the Commission's interrogatories based on the future allocation figure of \$28,662.50. JMI indicated that of this amount, 85% or \$24,363.12 was actually paid to the television stations by NCC and the Helms Committee for broadcast time. The remaining 15% or \$4,299.38 "is attributable to JMI's commission."

In connection with the Americans for Reagan television advertisement, NCC provided the Helms Committee with two distinct services. First, NCC had the commercial produced. Second, media time was purchased for broadcast. */ Services are only one of a number of items which are included within the definition of contribution. See 11 C.F.R. § 100.7(a). The Commission has long recognized through Advisory Opinions and past enforcement actions that the provision of services by one political committee to another and the payment for those services entails certain legal consequences under the Act. For example, the provision of any services at a charge which is less than the usual and normal charge for such services is a contribution. 11 C.F.R. § 100.7(a) (1) (iii) (A).

Through the use of interrogatories during the investigation of this matter, the Office of General Counsel attempted to

^{*/} Reference is to NCC as the provider of services inasmuch as NCC originated the idea for the Americans for Reagan advertisement and authorized both its production and broadcast (with a subsequent allocation made to the Helms Committee). Thus, the benefit derived from the commercial by the Helms Committee was the result of those services provided to it through the decision-making authority of NCC, even though the actual bookkeeping was performed by JMI.

Thus, it appears that under the facts provided in answer to the Commission's most recent interrogatories, JMI charged a commission for both the production and media time services it provided. However, even though JMI charged a \$300 commission for production services, one-half was not allocated to the Helms Committee. As a result, services were provided to Helms for less than the usual or normal charge, i.e. a \$150 contribution occurred. Additionally, even though a commission was charged for media buy services, a full one-half was not allocated between NCC and the Helms Committee (with the final allocation to be made in the future).

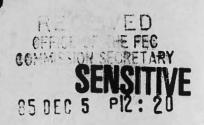
Thus, the evidence produced during this investigationn suggests that even though the Helms Committee was purportedly charged in full for services it received, a full 50/50 allocation did not occur. For the amount not allocated, the Helms Committee received services at charges less than the usual and normal charge. Thus, the unallocated amounts would give rise to contributions being made and received, in the form of production and broadcast services.

However, because respondents allocated over \$60,000 in costs on a 50/50 basis and only a relatively small amount (approximately \$1,000) was not yet allocated, the Office of General Counsel recommends that the Commission take no further action in this matter against NCC and Carter Wrenn, as treasurer, and against the Helms Committee and Mark L. Stephens, as treasurer, for violations of 2 U.S.C. § 44la(a)(2)(A), § 44la(f) and § 434, and close the file.

-7-III. GENERAL COUNSEL'S RECOMMENDATIONS The Office of General Counsel recommends that the Commission: Take no further action against the National Congressional Club and Carter Wrenn, as treasurer, for violations of 2 U.S.C. § 44la(a)(2)(A) and § 44la(f); Take no further action against the National Congressional Club and Carter Wrenn, as treasurer for violations of 2 U.S.C. § 434(b)(2)(D) and § 434(b)(4)(H)(i); Take no further action against Helms for Senate and Mark L. Stephens, as treasurer, for violations of 2 U.S.C. § 441a(a)(2)(A) and § 441a(f); 4. Take no further action against Helms for Senate for violations of 2 U.S.C. § 434(b)(2)(D) and § 434(b)(4)(G); 5. Approve the attached letters; and 6. Close the file. Charles N. Steele General Counsel BY: Associate General Counsel Attachments 1. Response 2. Letters to respondents 5 α



WASHINGTON, D.C. 20463



December 5, 1985

MEMORANDUM

TO:

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The Commission

FROM:

Charles N. Steele General Counsel

BY: Kenneth A. Gross

Associate General Counse

SUBJECT:

Withdrawal of General Counsel's Report

MUR 1748

National Congressional Club Carter Wrenn, treasurer

Helms for Senate

Mark L. Stephens, treasurer

The Office of General Counsel hereby withdraws the General Counsel's Report dated November 20, 1985 in MUR 1748. Responses were received in this matter on November 27 and December 2, 1985, rendering the Order and Subpoena unnecessary at this time.



WASHINGTON, D.C. 20463



December 5, 1985

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Mark L. Stephens, treasurer

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Sections OVINGTON & BURLING 1201 PENNSYLVANIA AVENUE, N. W. P. O. BOX 7566 WASHINGTON, D. C. 20044 TWX: 710 822-0005 (CB WSH) TELEPHONE TELEX: 89-803 (COVLING WSH) (202) 662-6000 TELECOPIER INFORMATION WRITER'S DIRECT DIAL NUMBER (202) 662-6280 CABLE: COVLING (202) 662-5462 - 000 December 2, 1985 BY HAND Eric Kleinfeld, Esq. Federal Election Commission 7th Floor 1325 K Street, N.W. Washington, D.C. 20463 Re: MUR 1748 Dear Mr. Kleinfeld: Enclosed for filing are a revised original and three copies of the response of Jefferson Marketing, Inc. to the Commission's questions and request for documents in the above matter, which was filed on November 27, 1985. Because certain information in the response is considered confidential proprietary information of Jefferson Marketing, Inc., pages 0 containing such confidential information were to have been stamped "CONFIDENTIAL." However, the confidential stamp was inadvertently omitted from the original and copies filed on C November 27. The enclosed original and copies should therefore be substituted for those filed on November 27. In addition, 2 Jefferson Marketing, Inc. requests that all of the documents submitted in response to the Commission's request for documents a be treated as confidential. Please have the fourth copy date-stamped and returned by our messenger. Sincerely, Elliott Schulder Enclosures

• CONFIDENTIAL
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- 2 -Inc.'s competitive position by providing its competitors with confidential and proprietary business information. GENERAL OBJECTIONS AND NON-WAIVER OF RIGHTS Jefferson Marketing, Inc. ("JMI") objects to many of the items in the Questions and Request for Documents on the grounds that these items are overly broad, and unreasonably burdensome and oppressive. In order to assist the Commission in resolving this matter, however, JMI responds as set forth below. By its response, JMI does not waive its rights to press any of the objections raised herein or to raise other objections before the Federal Election Commission or the courts. RESPONSE In response to questions by the Federal Election Commission ("Commission"), R.E. Carter Wrenn, Executive Director C of the National Congressional Club ("NCC") asserted that the Helms for Senate Committee ("HFS") paid \$1,938.63 for the production of a television advertisement entitled "Americans 0 for Reagan" ("AFR") which was one-half of the production cost. Additionally, Mr. Wrenn asserted, in response to later questions from the Commission, that Jefferson Marketing, Inc., ("JMI") produced the AFR advertisement. 1.a. Did JMI produce the AFR advertisement? Two AFR advertisements were produced, one a 30-second spot and the other a 60-second spot. JMI assisted in the production of the advertisements. 1.b. Please specify in detail what JMI did to produce the AFR advertisement.

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COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

TELEPHONE (202) 662-6000

WRITER'S DIRECT DIAL NUMBER

(202) 662-5462

(202) 662-6280 CABLE: COVLING

November 27, 1985

BY HAND

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Eric Kleinfeld, Esq. Federal Election Commission 7th Floor 1325 K Street, N.W. Washington, D.C. 20463

> Re: MUR 1748

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Dear Mr. Kleinfeld:

Enclosed for filing are the original and three copies of the amendments to the September 10, 1984 affidavit of R.E. Carter Wrenn in the above matter, and the amendments to the responses of the National Congressional Club dated January 14, 1985, and July 17, 1985, to the Commission's questions in the above matter.

Please have the fourth copies of each document date-stamped and returned by our messenger.

Sincerely,

Elliott Schulder

Enclosures

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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HELMS FOR SENATE COMMITTEE and NATIONAL CONGRESSIONAL CLUB

MUR 1748

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AMENDMENTS TO SEPTEMBER 10, 1984 AFFIDAVIT OF R.E. CARTER WRENN, EXECUTIVE DIRECTOR, NATIONAL CONGRESSIONAL CLUB

R.E. Carter Wrenn, having been duly sworn, states as follows:

- 1. I am the Executive Director of the National Congressional Club ("NCC"). On September 10, 1984, I submitted an affidavit in response to the complaint in the above matter filed with the Federal Election Commission by the Democratic Party of North Carolina. I have recently become aware of information that necessitates amending certain statements in my affidavit of September 10, 1984.
- Paragraph 10 of my affidavit of September 10,
 1984, states:

The advertisement ran on 21 television stations in six markets during this period. The total cost for these advertisements was \$61,005. NCC and HFS each paid \$30,502.50.

In fact, the advertisement ran on 22 television stations, not 21. In providing me with information to assist me in preparing my affidavit, Jefferson Marketing, Inc. ("JMI"), the media time buyer, omitted reference to one station (WNRW, in Greensboro) on which the ad was run.

In addition, the total actual cost for running the advertisement was \$57,325, not \$61,005. The latter figure (which omitted \$140 for airing the ad on WNRW) was the amount, reflected in JMI's purchase orders, that was actually ordered from the television stations for the AFR ad in question. NCC and HFS jointly purchased \$28,785 of air time for the AFR advertisement. Several days before the ad was to run, a decision was made to purchase additional time. HFS previously had purchased a substantial amount of time for the period in question, and agreed to run the AFR ad on \$16,265 of its previously purchased time. In an effort to match the amount of air time furnished by HFS, NCC purchased an additional \$15,955 of air time. Although this put NCC's and HFS's contributions some \$270 out of balance, JMI decided not to adjust its NCC and HFS advertising escrow accounts at that time, but to await the receipt of affidavits from the television stations on which the ads were to run. It is not unusual for a station inadvertently to run the wrong ad in the time-slot purchased, or to run an ad at the wrong time (at a cost different from that originally requested). The station must then, by way of affidavit, notify

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the advertising agency of the errors so that the necessary cost adjustments can be made. This happened on numerous occasions with the AFR ad. In early September 1984, JMI transferred \$1,362.50 from its HFS advertising escrow account to its NCC escrow JMI believed this adjustment was necessary to allocate the media costs evenly between NCC and HFS. However, at the time this adjustment was made, JMI had not yet received affidavits from all of the television stations on which the AFR advertisement had run. It was not until the preparation of this amended affidavit that JMI notified NCC of the actual final cost based on the amounts reflected in the affidavits. () After reviewing the affidavits, JMI has determined that \$27,705 . was withdrawn from JMI's NCC advertising escrow account and 0 \$29,620 was withdrawn from JMI's HFS advertising escrow account 3 to cover the cost of airing the AFR advertisement. In order to 0 achieve a final 50/50 allocation of the cost of running the advertisement in North Carolina, NCC will remit one-half the 0 difference, or \$957.50, to JMI's NCC advertising escrow account. JMI will then be instructed to credit the HFS advertising escrow account for \$957.50. The final total cost will thus be \$28,662.50 for NCC and \$28,662.50 for HFS. Based on the actual cost figures referred to in the preceding paragraph, the last sentence in paragraph 12 of my affidavit of September 10, 1984, should be amended to read

as follows: "Accordingly, we used \$14,745 of previously booked HFS time to air the commercial that is the subject of this complaint."

Based on the actual cost figures referred to above, and in light of NCC's intention to remit to JMI's NCC advertising escrow account the amount necessary to ensure an even allocation of costs, paragraph 13 of my affidavit of September 10, 1984, should be amended to read as follows:

This \$14,745 of HFS time does not represent a simple replacement of the joint advertisement for HFS advertisements. HFS's share of the total cost for the purchase of the joint project was \$28,662.50. HFS thus bore the cost of an additional \$13,917.50 of purchased advertising. In addition, originally scheduled HFS time during this period also was used by it for its own advertisements.

Under penalty of perjury, I declare that the foregoing facts are true and correct to the best of my knowledge and belief.

R.E. Casty Welm

Subscribed and sworn to before me this 272 day of November, 1985.

My Commission expires:

January 26, 1987

Janla L. Yay Notary Public

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In addition, the total actual cost for running the advertisement was \$57,325, not \$61,005. The latter figure (which omitted \$140 for airing the ad on WNRW) was the amount, reflected in JMI's purchase orders, that was actually ordered from the television stations for the AFR ad in question. NCC and HFS jointly purchased \$28,785 of air time for the AFR advertisement. Several days before the ad was to run, a decision was made to purchase additional time. HFS previously had purchased a substantial amount of time for the period in question, and agreed to run the AFR ad on \$16,265 of its previously purchased time. In an effort to match the amount of air time furnished by HFS, NCC purchased an additional \$15,955 of air time. Although this put NCC's and HFS's contributions some \$270 out of balance, JMI decided not to adjust its NCC and HFS advertising escrow accounts at that time, but to await the receipt of affidavits from the television stations on which the ads were to run. It is not unusual for a station inadvertently to run the wrong ad in the time-slot purchased, or to run an ad at the wrong time (at a cost different from that originally requested). The station must then, by way of affidavit, notify

the advertising agency of the errors so that the necessary cost adjustments can be made. This happened on numerous occasions with the AFR ad.

In early September 1984, JMI transferred \$1,362.50 from its HFS advertising escrow account to its NCC escrow account. JMI believed this adjustment was necessary to allocate the media costs evenly between NCC and HFS. However, at the time this adjustment was made, JMI had not yet received affidavits from all of the television stations on which the AFR advertisement had run. It was not until the preparation of this amended affidavit that JMI notified NCC of the actual final cost based on the amounts reflected in the affidavits. After reviewing the affidavits, JMI has determined that \$27,705 was withdrawn from JMI's NCC advertising escrow account and \$29,620 was withdrawn from JMI's HFS advertising escrow account to cover the cost of airing the AFR advertisement. In order to achieve a final 50/50 allocation of the cost of running the advertisement in North Carolina, NCC will remit one-half the difference, or \$957.50, to JMI's NCC advertising escrow account. JMI will then be instructed to credit the HFS advertising escrow account for \$957.50. The final total cost will thus be \$28,662.50 for NCC and \$28,662.50 for HFS.

Based on the actual cost figures referred to in 3. the preceding paragraph, the last sentence in paragraph 12 of my affidavit of September 10, 1984, should be amended to read

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Based on the actual cost figures referred to above, and in light of NCC's intention to remit to JMI's NCC advertising escrow account the amount necessary to ensure an even allocation of costs, paragraph 13 of my affidavit of September 10, 1984, should be amended to read as follows:

This \$14,745 of HFS time does not represent a simple replacement of the joint advertisement for HFS advertisements. HFS's share of the total cost for the purchase of the joint project was \$28,662.50. HFS thus bore the cost of an additional \$13,917.50 of purchased advertising. In addition, originally scheduled HFS time during this period also was used by it for its own advertisements.

Under penalty of perjury, I declare that the foregoing facts are true and correct to the best of my knowledge and belief.

R.E. Carter Jelmin

Subscribed and sworn to before me this 272 day of November,

My Commission expires: Junuary 36, 1987

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

The National Congressional Club and the Helms for Senate Committee

MUR 1748

AMENDED RESPONSES OF THE NATIONAL CONGRESSIONAL CLUB

The National Congressional Club ("NCC") hereby amends its responses, dated January 14, 1985, and July 17, 1985, to the Commission's questions in the above matter. The amendments to NCC's previous responses have been necessitated by the recent discovery of additional pertinent information. In responding to the Commission's questions concerning the production and the purchase of air time for the AFR advertisement referred to in the complaint, NCC relied on information provided by Jefferson Marketing, Inc. ("JMI"), which coordinated the production and purchased the air time. NCC has recently been notified by JMI that certain information it provided to NCC to assist NCC in preparing its responses was incomplete. The undersigned, R.E. Carter Wrenn, is Executive Director of NCC and has personal knowledge of the matters discussed herein.

A. The National Congressional Club's January 14, 1985 response to the Commission's questions should be amended as follows:

- 3 disclaimer on the 30-second AFR advertisement would be accurate when the advertisement aired outside North Carolina. JMI provided NCC with information to assist in preparation of NCC's January 14, 1985 response to questions concerning the production costs for the AFR advertisement in The information provided by JMI related to both AFR advertisements referred to above. In providing that information, JMI omitted reference to a \$2,022.89 charge from Audiophonics, Inc., which had been allocated between NCC and HFS, and to 8 charges from JMI and Castellanos & Co. totalling \$670, which had not been allocated. In addition, JMI did not bring the \$670 in charges to NCC's attention at the time NCC allocated the production costs between it and HFS. Was the production cost for the "Americans Question 2. For Reagan" advertisement paid entirely by NCC or did the Helms For Senate Committee ("HFS") also pay for part of the cost? If this cost was allocated between NCC and HFS, please indicate the amount paid by each committee. 2 Answer: When producing the AFR advertisements, NCC 0 recognized that, like the cost of media time benefiting Senator Helms' campaign, some portion of the production cost benefited HFS and should be allocated to it. As noted, the 30-second AFR ad in question was produced at the same time that another 60-second AFR ad was produced for NCC. At the time NCC and HFS discussed the allocation, it was not known which advertisements would air in North Carolina and which would air outside the state; nor was it known at that time how many times the adveroutside the state. After consulting with counsel, NCC and HFS accordingly agreed to allocate the production cost on the same basis (50/50) as we decided to allocate the cost of media time when North Carolina voters viewed the commercials, and we instructed JMI of this allocation. We believed this to be a reasonable division of the cost given the uncertainties and complexities involved in any other conceivable allocation

In the course of preparing this amended response, NCC learned that in fact \$670 in charges relating to production of the two AFR advertisements was not brought to NCC's attention at the time NCC allocated the production costs between it and HFS. See response to Question 2. As a result of that omission, NCC has paid \$3,620.08 and HFS has paid \$2,950.07, respectively, for production of the two AFR advertisements. Given that only one of the two AFR advertisements actually aired to a North Carolina audience (a fact that was not known at the time the production costs were allocated), NCC does not believe that it is necessary at this point to allocate the \$670 in charges between it and HFS. However, NCC is willing to allocate these charges evenly if the Commission advises us that such a result is required by the Federal Election Campaign Act and the Commission's regulations.

As to the \$402.32 to modify the disclaimer for airing the advertisement outside North Carolina, NCC paid the entire

1b. Were any other persons, organizations or entities involved in the production of the AFR advertisement? If the answer is yes, please specify who and specify what they did with regard to the production of the AFR ad. Answer: Yes. Jefferson Marketing, Inc. provided supervisory services and incurred incidental expenses in connection with production of the AFR advertisements, including the AFR advertisement in question. In addition, JMI forwarded to NCC invoices it received from other vendors to whom it had subcontracted production work on the AFR advertisements. Castellanos & Co., Inc. of Arlington, Virginia provided consulting services and technical support during the pre-production and production stages. Cinema Sound Ltd., also of Arlington, Virginia, videotaped and performed initial editing of the AFR advertisements. Audiofonics, Inc. of Raleigh, North Carolina provided additional technical work on the AFR advertisements, C including taping and editing the voice-over, modifying the disclaimers, and producing dubs for the airing of the AFR advertisement in question. 1c. Please state what portion of the \$1,938.63 paid by HFS is attributable to the actual expenses incurred by NCC in producing the AFR advertisement. See response to la. Answer: None. Please state what portion, if any, of the \$1,938.63 paid by HFS is attributable to overhead incurred by NCC in producing the AFR advertisement. Answer: None. See response to la. le. Please state what portion, if any, of the \$1,938.63 paid by HFS represents a profit charged by NCC to HFS for production of the advertisement. None. See response to la.

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Under penalty of perjury, I declare that the foregoing amended responses are accurate and true to the best of my knowledge and belief.

Date: 11-27-85

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R.E. Carter Wrenn

Sworn and subscribed to before me this 27th day of November, 1985.

Daula L. Tay Notary Public

My Commission Expires 1-26-87

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

The National Congressional Club and the Helms for Senate Committee

MUR 1748

AMENDED RESPONSES OF THE NATIONAL CONGRESSIONAL CLUB

The National Congressional Club ("NCC") hereby amends its responses, dated January 14, 1985, and July 17, 1985, to the Commission's questions in the above matter. The amendments to NCC's previous responses have been necessitated by the recent discovery of additional pertinent information. In responding to the Commission's questions concerning the production and the purchase of air time for the AFR advertisement referred to in the complaint, NCC relied on information provided by Jefferson Marketing, Inc. ("JMI"), which coordinated the production and purchased the air time. NCC has recently been notified by JMI that certain information it provided to NCC to assist NCC in preparing its responses was incomplete. The undersigned, R.E. Carter Wrenn, is Executive Director of NCC and has personal knowledge of the matters discussed herein.

A. The National Congressional Club's January 14, 1985 response to the Commission's questions should be amended as follows:

What was the total cost of producing or Question 1. making the television advertisement "Americans For Reagan" referred to in the complaint and attached as attachment A to the questions? The 30-second AFR advertisement referred to in Answer: the complaint was produced at the same time as a 60-second AFR advertisement that did not run in North Carolina and that is not the subject of this proceeding. In most instances, the production costs for the two AFR advertisements were not billed separately and thus the precise cost for producing the advertisement in question cannot be determined. The total production cost for the two AFR advertisements was \$6,972.47. This cost of the advertisements consists of six amounts: (1) \$370 for services provided by Castellanos & Co. during the pre-production and production stages; (2) \$300 for services provided and expenses incurred by Jefferson Marketing, Inc. during the production stage; (3) \$3,339.08 for additional services provided and expenses incurred by Castellanos & Co. and Cinema Sound, Inc. in producing the AFR Q advertisements; (4) \$2,022.89 for production work and tape dubs by Audiofonics, Inc.; (5) \$538.18 for work by Audiofonics, Inc. modifying the disclaimer on the 30-second AFR advertisement in question to reflect joint payment for the advertisement by NCC and the Helms for Senate Committee; (6) \$402.32 for a subsequent modification of the disclaimer by Audiofonics, Inc. to read "Paid for by the National Congressional Club. Not authorized by any Presidential candidate of Presidential candidate's committee." This last expenditure was necessary so that the

3 disclaimer on the 30-second AFR advertisement would be accurate when the advertisement aired outside North Carolina. JMI provided NCC with information to assist in preparation of NCC's January 14, 1985 response to questions concerning the production costs for the AFR advertisement in question. The information provided by JMI related to both AFR advertisements referred to above. In providing that information, JMI omitted reference to a \$2,022.89 charge from Audiophonics, Inc., which had been allocated between NCC and HFS, and to charges from JMI and Castellanos & Co. totalling \$670, which had not been allocated. In addition, JMI did not bring the \$670 in charges to NCC's attention at the time NCC allocated the production costs between it and HFS. Was the production cost for the "Americans Question 2. For Reagan" advertisement paid entirely by NCC or did the Helms For Senate Committee ("HFS") also pay for part of the cost? this cost was allocated between NCC and HFS, please indicate the amount paid by each committee. Answer: When producing the AFR advertisements, NCC 0 recognized that, like the cost of media time benefiting Senator Helms' campaign, some portion of the production cost benefited HFS and should be allocated to it. As noted, the 30-second AFR ad in question was produced at the same time that another 60-second AFR ad was produced for NCC. At the time NCC and HFS discussed the allocation, it was not known which advertisements would air in North Carolina and which would air outside the state; nor was it known at that time how many times the adver-

- 7 -1b. Were any other persons, organizations or entities involved in the production of the AFR advertisement? If the answer is yes, please specify who and specify what they did with regard to the production of the AFR ad. Jefferson Marketing, Inc. provided Yes. Answer: supervisory services and incurred incidental expenses in connection with production of the AFR advertisements, including the AFR advertisement in question. In addition, JMI forwarded to NCC invoices it received from other vendors to whom it had subcontracted production work on the AFR advertisements. Castellanos & Co., Inc. of Arlington, Virginia provided consulting services and technical support during the pre-production and production stages. Cinema Sound Ltd., also of Arlington, Virginia, videotaped and performed initial editing of the AFR advertisements. Audiofonics, Inc. of Raleigh, North Carolina provided additional technical work on the AFR advertisements, 0 ~ including taping and editing the voice-over, modifying the 0 disclaimers, and producing dubs for the airing of the AFR advertisement in question. 0 1c. Please state what portion of the \$1,938.63 paid by HFS is attributable to the actual expenses incurred by NCC in producing the AFR advertisement. Answer: None. See response to la. Please state what portion, if any, of the \$1,938.63 paid by HFS is attributable to overhead incurred by NCC in producing the AFR advertisement. Answer: None. See response to la. le. Please state what portion, if any, of the \$1,938.63 paid by HFS represents a profit charged by NCC to HFS for production of the advertisement. Answer: None. See response to la.

- 8 -2a. Of the \$30,627.50 allocated to HFS, what portion was paid or represents amounts paid, to the North and South Carolina television stations on which the ad was run? In his amended affidavit dated November 27, Answer: 1985, Mr. Wrenn states that the total actual cost for airing the AFR advertisement was \$57,325, and that based on the agreed upon 50/50 allocation, the share of the total actual cost for NCC and HFS is \$28,662.50 each. All of the \$28,662.50 allocated to HFS represents amounts paid to the North and South Carolina stations, with the exception of the commission earned N by the media time buyer. 2b. Of the \$30,627.50 allocated to HFS, what portion, if any, is attributable to the overhead of the media time buyer and the costs of providing the media time buy for the AFR ad? See response to 2a. NCC understands that the Answer: 0 media time buyer retained a 15% commission. NCC has no M knowledge of the "overhead" or "costs of providing the media 0 buy" for the media time buyer. 2c. Of the \$30,627.50 allocated to HFS, what C portion, if any, represents the profit charged by the media time buyer for the time buying service for the AFR ad? See response to 2a. NCC has no knowledge of the "profit charged" by the media time buyer. 2d. If the answer to 2c. indicates that a profit was realized on the media time buying service for the AFR advertisement, please explain how the amount to be charged to HFS as profit was finally determined and who made this determination. Answer: N/A.

Under penalty of perjury, I declare that the foregoing amended responses are accurate and true to the best of my knowledge and belief.

Date: 11-27-85

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R.E. Carter Wrenn

Sworn and subscribed to before me this 27th day of November, 1985.

Notary Public Y

... Co. Salon Expires 1-26-87

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

The National Congressional Club and the Helms for Senate Committee

MUR 1748

AMENDED RESPONSES OF THE NATIONAL CONGRESSIONAL CLUB

The National Congressional Club ("NCC") hereby amends its responses, dated January 14, 1985, and July 17, 1985, to the Commission's questions in the above matter. The amendments to NCC's previous responses have been necessitated by the recent discovery of additional pertinent information. In responding to the Commission's questions concerning the production and the purchase of air time for the AFR advertisement referred to in the complaint, NCC relied on information provided by Jefferson Marketing, Inc. ("JMI"), which coordinated the production and purchased the air time. NCC has recently been notified by JMI that certain information it provided to NCC to assist NCC in preparing its responses was incomplete. The undersigned, R.E. Carter Wrenn, is Executive Director of NCC and has personal knowledge of the matters discussed herein.

A. The National Congressional Club's January 14, 1985 response to the Commission's questions should be amended as follows:

2 Ouestion 1. What was the total cost of producing or making the television advertisement "Americans For Reagan" referred to in the complaint and attached as attachment A to the questions? The 30-second AFR advertisement referred to in Answer: the complaint was produced at the same time as a 60-second AFR advertisement that did not run in North Carolina and that is not the subject of this proceeding. In most instances, the production costs for the two AFR advertisements were not billed separately and thus the precise cost for producing the advertisement in question cannot be determined. 10 0. The total production cost for the two AFR advertisements was \$6,972.47. This cost of the advertisements consists of six amounts: (1) \$370 for services provided by Castellanos & Co. during the pre-production and production stages; (2) \$300 for services provided and expenses incurred by Jefferson Marketing, Inc. during the production stage; (3) \$3,339.08 for additional services provided and expenses incurred by Castellanos & Co. and Cinema Sound, Inc. in producing the AFR œ advertisements; (4) \$2,022.89 for production work and tape dubs by Audiofonics, Inc.; (5) \$538.18 for work by Audiofonics, Inc. modifying the disclaimer on the 30-second AFR advertisement in question to reflect joint payment for the advertisement by NCC and the Helms for Senate Committee; (6) \$402.32 for a subsequent modification of the disclaimer by Audiofonics, Inc. to read "Paid for by the National Congressional Club. Not authorized by any Presidential candidate of Presidential candidate's committee." This last expenditure was necessary so that the

- 3 disclaimer on the 30-second AFR advertisement would be accurate when the advertisement aired outside North Carolina. JMI provided NCC with information to assist in preparation of NCC's January 14, 1985 response to questions concerning the production costs for the AFR advertisement in question. The information provided by JMI related to both AFR advertisements referred to above. In providing that information, JMI omitted reference to a \$2,022.89 charge from Audiophonics, Inc., which had been allocated between NCC and HFS, and to S charges from JMI and Castellanos & Co. totalling \$670, which had not been allocated. In addition, JMI did not bring the \$670 in charges to NCC's attention at the time NCC allocated the production costs between it and HFS. Was the production cost for the "Americans Question 2. For Reagan" advertisement paid entirely by NCC or did the Helms For Senate Committee ("HFS") also pay for part of the cost? this cost was allocated between NCC and HFS, please indicate the amount paid by each committee. Answer: When producing the AFR advertisements, NCC œ recognized that, like the cost of media time benefiting Senator Helms' campaign, some portion of the production cost benefited HFS and should be allocated to it. As noted, the 30-second AFR ad in question was produced at the same time that another 60-second AFR ad was produced for NCC. At the time NCC and HFS discussed the allocation, it was not known which advertisements would air in North Carolina and which would air outside the state; nor was it known at that time how many times the adveroutside the state. After consulting with counsel, NCC and HFS accordingly agreed to allocate the production cost on the same basis (50/50) as we decided to allocate the cost of media time when North Carolina voters viewed the commercials, and we instructed JMI of this allocation. We believed this to be a reasonable division of the cost given the uncertainties and complexities involved in any other conceivable allocation

learned that in fact \$670 in charges relating to production of the two AFR advertisements was not brought to NCC's attention at the time NCC allocated the production costs between it and HFS. See response to Question 2. As a result of that omission, NCC has paid \$3,620.08 and HFS has paid \$2,950.07, respectively, for production of the two AFR advertisements. Given that only one of the two AFR advertisements actually aired to a North Carolina audience (a fact that was not known at the time the production costs were allocated), NCC does not believe that it is necessary at this point to allocate the \$670 in charges between it and HFS. However, NCC is willing to allocate these charges evenly if the Commission advises us that such a result is required by the Federal Election Campaign Act and the Commission's regulations.

As to the \$402.32 to modify the disclaimer for airing the advertisement outside North Carolina, NCC paid the entire

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- 7 -1b. Were any other persons, organizations or entities involved in the production of the AFR advertisement? If the answer is yes, please specify who and specify what they did with regard to the production of the AFR ad. Answer: Yes. Jefferson Marketing, Inc. provided supervisory services and incurred incidental expenses in connection with production of the AFR advertisements, including the AFR advertisement in question. In addition, JMI forwarded to NCC invoices it received from other vendors to whom it had subcontracted production work on the AFR advertisements. Castellanos & Co., Inc. of Arlington, Virginia provided consulting services and technical support during the pre-production and production stages. Cinema Sound Ltd., also of Arlington, Virginia, videotaped and performed initial editing of the AFR advertisements. Audiofonics, Inc. of Raleigh, North Carolina provided additional technical work on the AFR advertisements, including taping and editing the voice-over, modifying the C disclaimers, and producing dubs for the airing of the AFR advertisement in question. 0 1c. Please state what portion of the \$1,938.63 paid by HFS is attributable to the actual expenses incurred by NCC in producing the AFR advertisement. See response to la. Answer: None. Please state what portion, if any, of the \$1,938.63 paid by HFS is attributable to overhead incurred by NCC in producing the AFR advertisement. None. See response to la. Answer: le. Please state what portion, if any, of the \$1,938.63 paid by HFS represents a profit charged by NCC to HFS for production of the advertisement. Answer: None. See response to la.

Under penalty of perjury, I declare that the foregoing amended responses are accurate and true to the best of my knowledge and belief. R.E. Carter Wuns Date: 11-27-85 Sworn and subscribed to before me this 27th day of November, 1985. Danla L. Tay Notary Public 0 4 0 in, the sain Expires 1-26-87 5 0 ~ C 0 0

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

The National Congressional Club and the Helms for Senate Committee

MUR 1748

AMENDED RESPONSES OF THE NATIONAL CONGRESSIONAL CLUB

The National Congressional Club ("NCC") hereby amends its responses, dated January 14, 1985, and July 17, 1985, to the Commission's questions in the above matter. The amendments to NCC's previous responses have been necessitated by the recent discovery of additional pertinent information. In responding to the Commission's questions concerning the production and the purchase of air time for the AFR advertisement referred to in the complaint, NCC relied on information provided by Jefferson Marketing, Inc. ("JMI"), which coordinated the production and purchased the air time. NCC has recently been notified by JMI that certain information it provided to NCC to assist NCC in preparing its responses was incomplete. The undersigned, R.E. Carter Wrenn, is Executive Director of NCC and has personal knowledge of the matters discussed herein.

A. The National Congressional Club's January 14, 1985 response to the Commission's questions should be amended as follows:

2 Question 1. What was the total cost of producing or making the television advertisement "Americans For Reagan" referred to in the complaint and attached as attachment A to the questions? The 30-second AFR advertisement referred to in Answer: the complaint was produced at the same time as a 60-second AFR. advertisement that did not run in North Carolina and that is not the subject of this proceeding. In most instances, the production costs for the two AFR advertisements were not billed separately and thus the precise cost for producing the advertisement in question cannot be determined. 7 The total production cost for the two AFR advertisements was \$6,972.47. This cost of the advertisements consists of six amounts: (1) \$370 for services provided by Castellanos & Co. during the pre-production and production stages; (2) \$300 for services provided and expenses incurred by Jefferson Marketing, Inc. during the production stage; (3) \$3,339.08 for additional services provided and expenses incurred by Castellanos & Co. and Cinema Sound, Inc. in producing the AFR Œ advertisements; (4) \$2,022.89 for production work and tape dubs by Audiofonics, Inc.; (5) \$538.18 for work by Audiofonics, Inc. modifying the disclaimer on the 30-second AFR advertisement in question to reflect joint payment for the advertisement by NCC and the Helms for Senate Committee; (6) \$402.32 for a subsequent modification of the disclaimer by Audiofonics, Inc. to read "Paid for by the National Congressional Club. Not authorized by any Presidential candidate of Presidential candidate's committee." This last expenditure was necessary so that the

- 3 disclaimer on the 30-second AFR advertisement would be accurate when the advertisement aired outside North Carolina. JMI provided NCC with information to assist in preparation of NCC's January 14, 1985 response to questions concerning the production costs for the AFR advertisement in question. The information provided by JMI related to both AFR advertisements referred to above. In providing that information, JMI omitted reference to a \$2,022.89 charge from Audiophonics, Inc., which had been allocated between NCC and HFS, and to 'A charges from JMI and Castellanos & Co. totalling \$670, which had not been allocated. In addition, JMI did not bring the \$670 in charges to NCC's attention at the time NCC allocated the production costs between it and HFS. Question 2. Was the production cost for the "Americans For Reagan" advertisement paid entirely by NCC or did the Helms For Senate Committee ("HFS") also pay for part of the cost? this cost was allocated between NCC and HFS, please indicate the amount paid by each committee. When producing the AFR advertisements, NCC œ recognized that, like the cost of media time benefiting Senator Helms' campaign, some portion of the production cost benefited HFS and should be allocated to it. As noted, the 30-second AFR ad in question was produced at the same time that another 60-second AFR ad was produced for NCC. At the time NCC and HFS discussed the allocation, it was not known which advertisements would air in North Carolina and which would air outside the state; nor was it known at that time how many times the adver-

- 5 amount. NCC did so because it received all the benefit from that expense. Mr. Wrenn states in his affidavit that NCC Question 3. purchased television time for the "Americans for Reagan" advertisement in cities which were not located in North Carolina. For each television station located outside North Carolina where television time was purchased to run "Americans for Reagan" list the following: (1) the name of the television station; (2) the city and state in which the television station is located; (3) the dates on which the advertisement was run; and (4) the cost of the television time. In answering this question, please identify each station located outside North Carolina where the station reaches a substantial number of North Carolina viewers and where the costs for television time were divided between NCC and HFS. Answer: NCC aired the commercial in the following cities outside North Carolina: PURCHASED N.C. DATES PENETRATION STATION MARKET AMOUNT 0 9/22-9/23 KRLD TV Dallas, TX \$1,000 No KNXV TV Phoenix, AZ 9/8-9/9 \$ 975 No KFMZ TV Allentown, PA 9/7-9/8 \$1,000 No WPEC TV West Palm Beach, FL 9/7-9/10 \$1,000 No KDOC TV Anaheim, CA 9/8-9/9 \$ 850 No KRIV TV 9/7-9/9 \$1,000 Houston, TX No In addition to the above, the commercial also aired on three television stations in South Carolina: WHNS and WYFF

- 7 -1b. Were any other persons, organizations or entities involved in the production of the AFR advertisement? If the answer is yes, please specify who and specify what they did with regard to the production of the AFR ad. Yes. Jefferson Marketing, Inc. provided supervisory services and incurred incidental expenses in connection with production of the AFR advertisements, including the AFR advertisement in question. In addition, JMI forwarded to NCC invoices it received from other vendors to whom it had subcontracted production work on the AFR advertisements. Castellanos & Co., Inc. of Arlington, Virginia provided consulting services and technical support during the pre-production and production stages. Cinema Sound Ltd., also of Arlington, Virginia, videotaped and performed initial editing of the AFR advertisements. Audiofonics, Inc. of Raleigh, North Carolina 0 provided additional technical work on the AFR advertisements, including taping and editing the voice-over, modifying the 0 disclaimers, and producing dubs for the airing of the AFR advertisement in question. α 1c. Please state what portion of the \$1,938.63 paid by HFS is attributable to the actual expenses incurred by NCC in producing the AFR advertisement. See response to la. Answer: None. Please state what portion, if any, of the \$1,938.63 paid by HFS is attributable to overhead incurred by NCC in producing the AFR advertisement. None. See response to la. Answer: le. Please state what portion, if any, of the \$1,938.63 paid by HFS represents a profit charged by NCC to HFS for production of the advertisement. Answer: None. See response to la.

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Under penalty of perjury, I declare that the foregoing amended responses are accurate and true to the best of my knowledge and belief.

Date: 11-27-85

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R.E. Carter Wrenn

Notary Public Jay

..., con ... selen Expires 1-26-87

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE N. W.

P. O. BOX 7566

WASHINGTON, D. C. 2004

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(202) 682-8280
CABLE: COVLING

November 27, 1985

BY HAND

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Eric Kleinfeld, Esq. Federal Election Commission 7th Floor 1325 K Street, N.W. Washington, D.C. 20463

Re: MUR 1748

Dear Mr. Kleinfeld:

Enclosed for filing are the original and three copies of the response of Jefferson Marketing, Inc. to the Commission's questions and request for documents dated September 19, 1985, in the above matter.

Please have the fourth copy date-stamped and returned by our messenger.

Sincerely,

Elliott Schulder

Enclosures

JEFFERSON MARKETING INC. P. O. BOX 19807 RALEIGH, N. C. 27819 Nº 6179

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July 18,

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

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© € 7/18/84 ∞ € 7/18/84	PO \$11118 - To purchase TV time for Helms for Senate.	\$1105.00
	RECEIPTTS AFFIDAVIT REQUESTED	

JEFFERSON MARKETING INC. P. O. BOX 19807 RALEIGH, N. C. 27010

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

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DATE	DESCRIPTION	AMOUNT
7/11/84	PO \$10945 - To purchase TV time for Helms for Senate.	\$1241.00
	RECEIPT & AFFIDAVIT REQUESTED	

No

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66-30

July 18,

24

WLOS - TY

1088.00

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11155 - To purchase TV time for Helms for Senate/ Americans for Reagan.	\$1088.00
	RECEIPT & AFFIDAVIT REQUESTED	

No

6161

56-30 531

July 18,

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FIRST CITIZENS BANK
Pirst Citizens Bank & Trust Company
Raleigh, N.C. 27602

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

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DATE	DESCRIPTION	AMOUNT
6/ 18/84	PO \$11114 - To purchase TV time for Selms for Senate.	\$3187.50
	RECEIPT & AFFIDAVIT REQUESTED	

Nº 6114

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July 11,

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

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~	DATE	DESCRIPTION	AMOUNT .
	7/11/84	PO \$10947 - To purchase TV time for Helms for Semate.	\$1062.50
		RECEIPT & AFFIDAVIT REQUESTED	

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July 18.

84

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THE SUM 5 I CO O O O O O O O

510.00

FIRST CITIZENS BANK
First Citizens Bank & Trust Company

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DESCRIPTION	AMOUNT
PO #11157 - To purchase TV time for Helms for Semate/ Americans for Resgam.	\$510.00
RECEIPT & AFFIDAVIT REQUESTED	
	PO #11157 - To purchase TV time for Belms for Semate/ Americans for Resgam.

No

6178

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July 18,

84

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2677.50

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FIRST CITIZENS BANK First Citizens Bonk & Trust Company Raleigh, N.C. 27602

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO \$11119 - To purchase TV time for Belms for Secite.	\$2677.50
	RECEIPT& AFFIDAVIT REQUESTED	

Nº 6113

July 11,

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2830.50

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FIRST CITIZENS BANK
First Citizens Bank & Trust Company
Raleigh, N.C. 27602

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0	DATE	DESCRIPTION	AMOUNT
\$ 0 \$ \\ \overline{\chi}	7/11/84	PO #10946 - To purchase TV time for Helms for Senate.	\$2830.50
or .		RECEIPT & AFFIDAVIT REQUESTED	

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Nº 6204

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July 18,

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FIRST CITIZENS BANK First Citizens Benk & Trust Company Releigh, N.C. 27602

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JEFFERSON MARKETING INC.

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11156 - To purchase TV time for Helms for Senate.	\$616.25
	RECEIPT & AFFIDAVIT ENQUESTED	

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July 18,

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FIRST CITIZENS BANK

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JEFFERSON MARKETING INC.

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11113 - To purchase TV time for Helms for Senate.	\$612.00
	RECEIPT & AFFDIAVIT REQUESTED	

P. O. BOX 19807 RALEIGH, N. C. 27818

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6202

July 18,

212.50

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FIRST CITIZENS BANK First Citizens Bank & Trust Company

COPY NOT NEGOTIABLE

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11158 - To purchase TV time for Helms for Senate/ Americans for Leagan.	\$212.50
	RECEIPT & AFFIDAVIT REQUESTED	

Nº

6173

66-30 531

July 18,

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11002 - To purchase TV time for Helms for Senate.	\$2018.75
	RECEIPT & AFFDIAVIT REQUESTED	

Nº 6099

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4224.50

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FIRST CITIZENS BANK
First Citizens Bank & Trust Company
Releigh, N.C. 27602

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DATE	DESCRIPTION	AMOUNT
7/11/84	PO #10939 - To purchase TV time for Helms for Senate.	\$4224.50
	RECEIPT & APPIDAVIT REQUESTED	

Nº

6211

July 18,

2741.25

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

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THE SUM 29 I Table 25 CIS

FIRST CITIZENS BANK First Citizens Bank & Trust Company Releigh, N.C. 27602

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DESCRIPTION	AMOUNT
PO #11104 - To purchase TV time for Helms for Senate.	\$2911.25
RECEIPT & APPIDAVIT REQUESTED	
	PO #11104 - To purchase TV time for Belms for Senate.

Nº 6175

66-30 531

July 18,

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FIRST CITIZENS BANK First Citizens Benk & Trust Company Releigh, N.C. 27402

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO \$11041 - To purchase TV time for Helms for Senate.	\$2125.00
	RECEIPT & AFFIDAVIT REQUESTED	

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July 11,

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365.50

THE SUN 365 MOTE OFF

FIRST CITIZENS BANK
First Citizens Bank & Trust Company
Roleigh, N.C. 27602

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· _	DATE	DESCRIPTION	AMOUNT
	7/11/84	PO #10922 - To purchase TV time for Belme for Senate.	\$365.50
		RECEIPT & AFFIDAVIT REQUESTED	

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6210

<u>66-30</u> 531

July 18,

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Releigh, N.C. 27602

COPY NOT NEGOTIABLE

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11162 - To perchase TV time for Belme for Semate.	\$807.50
	RECEIPT & AFFIDAVIT REQUESTED	

Nº

6148

<u>66-30</u> 531

July 18,

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	T CITIZENS BANK Izons Bank & Trust Company , N.C. 27602	
	COPY NOT NEGOTIABLE	
Jefferson Marketi	Na INC.	
DATE	DESCRIPTION	AMOUN
7/18/84	PO #11105 - To purchase TV time for Helms for Senate.	\$3357.5
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	RECEIPT & AFFIDAVIT REQUESTED	
	RECEIPT & AFFIDAVIT REQUESTED	

Nº 6172

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July 18,

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THE SUNI 9 J P. W. F. OSTS

FIRST CITIZENS BANK
First Citizens Bank & Trust Company
Raleigh, N.C. 27602

COPY NOT NEGOTIABLE.

DESCRIPTION	AMOUNT
PO \$11005 - To purchase TV time for Helms for senate,	\$1912.50
RECEIPT & AFFIDAVIT REQUESTED	
	PO \$11005 - To purchase TV time for Helms for senate,

Nº 6184

<u>66-30</u>

July 18,

425.00

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO #10995 - To purchase TV time for Heims for Senate.	\$425.00
	RECEIPT & AFFIDAVIT REQUESTED	

Nº

6149

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July 18,

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191.25

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FIRST CITIZENS BANK
First Citizens Bonk & Trust Company
Raleigh, N.C. 27602

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11106 - To purchase TV time for Helms for Semate.	\$191.25
	RECEIPT & APPIDAVIT REQUESTED	

Nº

6284

66-30 531

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FIRST CITIZENS BANK
Pirst Citizens Bonk & Trust Company
Releigh, N.C. 27602

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DATE	DESCRIPTION	AMOUNT
8/1/84	PO \$10916 - To purchase TV time for Helms for Senate.	\$331.50
	RECEIPT & AFFIDAVIT REQUESTED	

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July 18,

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408.00

THE SUN408 POR OCKS FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

COPY NOT NEGOTIABLE

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11164 - To purchase TV time for Helms for Senate/	\$408.00
	RECEIPT & PAAIDAVIT REQUESTED	

JEFFERSON MADETING

JEFFERSON MARKETING INC. P. O. BOX 19807 RALEIGH, N. C. 27818 Nº

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July 18,

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO #10999 - To purchase TV time for Helms for Senate.	\$765.00
	RECEIPT & AFFIDAVIT REQUESTED	

Nº 6188

July 18,

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FIRST CITIZENS BANK

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO \$11058 - To purchase TV time for Helms for Senate.	\$1925.25
	RECEIPT & AFFEDAVIT REQUESTED	

Nº 6209

July 18,

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Roleigh, N.C. 27602

COPY NOT NEGOTIABLE

,	DATE	DESCRIPTION	AMOUNT
	7/18/84	PO #11161 - To purchase TV time for Belms for Senate/ Americans for Reagan.	\$1286.50
		RECEIPT & AFFIDAVIT REQUESTED	

Nº 6151

July 18,

84

3187.50

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11109 - To purchase TV time for Helms for Senate.	\$3187.50
	RECEIPT 4 AFFIDAVIT REQUESTED	

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July 18,

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FIRST CITIZENS BANK
First Citizens Bank & Trust Company
Raleigh, N.C. 27602

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO #10997 - To purchase TV time for Helms for Senate.	\$595.00
	RECEIPT & APPDIAVIT REQUESTED	

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<u>66-30</u> 531

July 18,

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FIRST CITIZENS BANK
First Citizens Bank & Trust Company
Releigh, N.C. 27402

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11000 - To purchase TV time for Salme for Senate.	\$1827.50
	RECEIPT & AFFIDAVIT REQUESTED	

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First Citizens Benk & Trust Company
Releigh, N.C. 27602

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11059 - To purchase TVtime for Helms for Senate.	\$573.75
	RECEIPT & AFFIDAVIT REQUESTED	
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RALEIGH, N. C. 27819

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Baleigh, N.C. 27602

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11160 - To purchase TV time for Helms for Senate/ Americans for Reagan.	\$1275.00
	RECEIPT & AFFIDAVIT REQUESTED	

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First Citizents Bank & Trust Company

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JEFFERSON MARKETING INC.

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P.O. BOX 10607

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11106 - To purchase TV time for Helme for Senate.	\$1190.00
	RECEIPT & AFFIDAVIT REQUESTED	

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

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DATE	DESCRIPTION	AMOUNT
7/9/84	PO \$10949 - To purchase TV time for Belms for Senate.	\$1394.00
	RECEIPT & AFFIDAVIT REQUESTED	

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FIRST CITIZENS BANK
First Citizens Bank & Trust Company
Palaish M.C. 27402

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11001 - To purchase TV timef for Helms for Senate.	\$3604.00
	RECEIPT & AFFIDAVIT REQUESTED	
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FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

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DATE	DESCRIPTION	AMOUNT
7/11/84	PO #11060 - To purchase TV time for Belms for Senate.	\$382.50
	RECEIPT & AFFIDAVIT REQUESTED	

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July 18,

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FIRST CITIZENS BANK
First Citizens Bank & Trust Company
Raleigh, N.C. 27402

COPY NOT NEGOTIABLE

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11165 - To purchase TV time for Helms for Senate/ Americans for Reagan.	\$1381.25
	RECEIPT & AFFIDAVIT REQUESTED	

JEFFERSON MARKETING, INC

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO \$18487755To purchase TV time for Helms fo Senate.	\$1848.75
	RECEIPT & AFFIDAVIT REQUESTED	
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Nº

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3357.50

July 18,

WRAL - TV

THE SUM 3 3 5 7 190 7 5 10 175
FIRST CITIZENS BANK
First Citizens Bank & Trust Company
Releigh, N.C. 27602

DATE	DESCRIPTION	AMOUNT
7/18/84	PO \$11166 - To purchase TV time for Helms for Semate.	\$3357.50
	RECEIPT & AFFIDAVIT REQUESTED	

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FIRST CITIZENS BANK First Citizens Bank & Trust Company

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DATE	DESCRIPTION	AMOUNT
7/11/84	PO \$11063 - TO PURCHASE TV time for Heins for Senate.	\$782.00
	RECEIPT & APPIDAVIT REQUESTED	

Nº 6160

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July 18,

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

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JEFFERSON MARKETING INC.

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11110 - To purchase TV time for Belms for Senate.	\$956.25
	RECEIPT & AFFIDAVIT REQUESTED	

JEFFERSON MARKETING INC. MALEIGH, N. C. 27818

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6176

July 18,

935.00

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COPY NOT NEGOTIABLE

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11116 - To purchase TV time for Helms for Semate.	\$935.00
	RECEIPT & AFFIDAVIT REQUESTED	

Nº 6115

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July 11,

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

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DESCRIPTION	AMOUNT
PO #11010 - To purchase TV time for Selas for Senate.	\$280.50
RECEIPT & AFFIDAVIT REQUESTED	
	PO #11010 - To purchase TV time for Selms for Senate.

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July 18,

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FIRST CITIZENS BANK
Pirst Citizens Bank & Trust Company
Raleigh, N.C. 27602

COPY NOT NEGOTIABLE

DATE	DESCRIPTION	AMOUNT
7/18/84	PO \$11153 - To purchase TV time for Helms for Senate.	\$59.50
	RECEIPT & AFFIDAVIT REQUESTED	

Nº 6159

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July 18,

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FIRST CITIZENS BANK First Citizens Book & Trust Company Roleigh, N.C. 27602

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11112 - To purchase TV time for Helms for Senate.	\$63.75
	RECEIPT & AFFIDAVIT REQUESTED	

Nº 6181

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July 18,

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FIRST CITIZENS BANK First Citizens Benk & Trust Company Releigh, N.C. 27602

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11117 - To purchase TV time for Elems for Senate. Cashier's check Bank Charge	\$212.50 1.00 \$213.80

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No 6117

July 12,

613.00

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

COPY NOT NEGOTIABLE

DATE	DESCRIPTION	AMOUNT
7/12/84	PO #11062 - To purchase TV time for Helms for Senate. Cashier's Check WIVD - TV Bank Charge	\$612.00 \$ 1.00 \$613.00
	RECEIPT & AFFIDAVIT REQUESTED	

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First Citizens Bank & Trust Company
Roleigh, N.C. 27602

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	DATE	DESCRIPTION	AMOUNT
, (7/11/84	PO #10944 - To purchase TV time for Halms for Senate. Cashier's check - WIVD - TV Bank Charge -	\$2397.00 1.00 \$2298.00
		RECEIPT & APPIDAVIT REQUESTED	
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July 18,

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FIRST CITIZENS BANK First Citizens Benk & Trust Company Releigh, N.C. 27602

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11159 - To purchase TV time for Helms for Senate/ Americans for Reagan. Cashier's Check Bank Charge	\$1224.00 1.00 \$1225.00

77-2948.84

P. O. BOX 19667 RALEIGH, N. C. 27819

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July 18,

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FIRST CITIZENS BANK First Citizens Bank & Raleigh, N.C. 27602

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0_	DATE	DESCRIPTION	AMOUNT
5 0 9	7/18/84	PO #11111 - WIVD - TV Cashier's check Bank Charge	\$3383.00 1.00 \$\$384.00
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P. O. BOX 19807 RALEIGH, N. C. 27819

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6206

July 18,

136.00

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

COPY NOT NEGOTIABLE

AMOUNT	DATE DESCRIPTION
#136.00	77/18/84 PO #11154 - To purchase TV time for Helms for Senate/ Americans for Resgam.
	RECEIPT & AFFIDAVIT REQUESTED
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First Citizens Bank & Trust Company
Raleigh, N.C. 27602

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~.	DATE	DESCRIPTION	AMOUNT
0 3 0	7/18/84	PO #11057 - To purchase TV time for Halms for Seate.	\$199.25
•	111		
CC.		RECEIPT & APPIDAVIT REQUESTED	



ATYETTENS ACCOUNT MCS BATHRETT CT. P. O. BOX 19327 RALEIGH, ING. 57618 October 5, 1984

CHEER OF WHET- TY

THE SUM 43 POSTS



CENTRAL CAROLINA BASTE, R.A.
CENTRAL COAD OFFICE
RALEGER, FIRTH CLASSICAL STORE

NOT NEGOTIABLE

JEFFERSON MARKETING, INC. ADVERTISING ACCOUNT

DELLEGE - PORM DVG-8 V-8

10/5/84

Balance due on P.O. #11057 for week 66 PO # 12216 July 20-26 Comments for Senate

\$43.00

Advertising/Bolding/fl - NPS TV Purchase

CHEEK ATTACHED: RECEIPT & APPIDAVIT REQUESTED

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

Nº

6190

66-30 531

July 18,

84

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO #10941 - To purchase TV time for Helms for Senate.	\$1007.25
	RECEIPT & AFFIDAVIT REQUESTED	

Nº 6198

66-30 531

318.75

July 18,

WHET - TV

THE SUNGIBOR TERM

FIRST CITIZENS BANK
First Citizens Bank & Trust Company

COPY NOT NEGOTIABLE

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11142 - To purchase TV time for Reine for Senate/ Americans for Reagan.	\$318.75
	RECEIPT & AFFIDAVIT REQUESTED	

JEFFERSON MARKETING, INC. INC.

19 6154

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July 18,

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FIRST CITIZENS BANK
First Citizens Bank & Trust Company

COPY NOT NEGOTIABLE

DATE	DESCRIPTION	AMOUNT
7/18/84	PO \$11099 - To purchase TV time for Belms for Senate.	\$867.00
	RECEIPT & AFFIDAVIT REQUESTED	

P. O. BOX 19807 RALEIGH, N. C. 27819

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Nº 6167

<u>66-30</u> 531

July 18.

467.50

THE SUN467 MINS 5 DITS

FIRST CITIZENS BANK
First Citizens Bank & Trust Company
Paleigh, N.C. 27602

COPY NOT NEGOTIABLE

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11056 - To purchase TV time for Helms for Senate.	\$467.50
	RECEIPT & APPIDAVIT REQUESTED	

P. O. BOX 19807 RALEIGH, N. C. 27818

Nº 6191

July 18,

544.00

FIRST CITIZENS BANK
First Citizens Bank & Trust Company
Releigh, N.C. 27602

COPY NOT NEGOTIABLE

2	DATE	DESCRIPTION	AMOUNT
	7/18/84	PO \$10940 - To purchase TV time for Helms for Senate.	\$544.00
		RECEIPT & AFFIDAVIT REQUESTED	

Jefferson Marketing Inc. P. Q. BQX 19807 RALEIGH, N. C. 27619

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<u>66-30</u> 531

July 18,

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

COPY NOT NEGOTIABLE

DATE		DESCRIPTION	AMOUNT
© 7/18	3/84	PO #11152 - To purchase TV time for Helms for Senate/ Americans for Reagam.	\$333.75
		RECEIPT & AFFIDAVIT REQUESTED	

6158

P. O. BOX 19807 RALEIGH, N. C. 27819

July 18,

476.00

THE SUMLIT GOODS THE SUMLIT GOODS THE SUMLIT GOODS THE SUMLIT GOODS THE STRUCK COMPANY Releigh, N.C. 27602

COPY NOT NEGOTIABLE

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11098 - To purchase TV time for Below for Senate.	\$476.00
	RECEIPT & AFFIDAVIT REQUESTED	

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66-30 531

July 18,

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

COPY NOT NEGOTIABLE

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11061 - To purchase TV time for Heine for Senate.	\$552.50
	RECEIPT & AFFIDAVIT REQUESTED	

Nº

6189

66-30 531

July 18,

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654.50

THE SUM 65 A TO THE COSTS

FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO #10942 - To purchase TV time for Helms for Senate.	\$654.50
	RECEIPTT& AFFIDAVIT REQUESTED	

P. O. BOX 19867 RALEIGH, N. C. 27818

No 6196

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July 18,

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

COPY NOT NEGOTIABLE

DATE	DESCRIPTION	AMOUNT
∝ 7/18/84 (<u>·</u>	PO #11144 - To purchase TV time for Helms for Senate/ Americans for Reagan.	\$284.75
	RECEIPT & AFFIDAVIT REQUESTED	



6157

July 18,

786.25

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Pires Citizens Bank & Trust Company
Releigh, N.C. 27602

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DATE	DESCRIPTION	AMOUNT
77/18/84 3 «	PO \$11097 - To purchase TV time for Helms for Senate.	\$786.25
	RECEIPT & AFFIDAVIT REQUESTED	

Nº 6163

<u>66-30</u> 531

July 18,

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Rainigh, N.C. 27602

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11067 - To purchase TV time for Helms for Senate.	\$684.25
	RECEIPT & AFFDAVIT REQUESTED	

No

6107

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July 11,

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THE SUNTIPERS BANK
First Citizens Bank & Trust Company
Raleigh, N.C. 27602

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0 -	DATE	DESCRIPTION	AMOUNT
\$ 0 3	7/11/84	PO #10460 - To purchase TV time for Helms for Senate.	\$1126.25
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FIRST CITIZENS BANK First Citizens Bonk & Trust Company Releigh, N.C. 27602

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PO #11143 - To purchase TV time for Belme for Senate/ Americans for Reagen.	\$437.75
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	Americans for Reagen.

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6193

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July 18,

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Releigh, N.C. 27402

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_	DATE	DESCRIPTION	AMOUNT
	7/18/84	PO #11100 - To purchase TV time for Belms for Sunate.	\$828,75
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July 18,

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Releigh, N.C. 27602

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JEEFERSON MARKETING INC.

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11065 - To purchase TV time for Halms for Senate.	\$998.75
	RECEEPT & APPIDAVIT REQUESTED	

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6108

July 11,

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

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	DATE	DESCRIPTION	AMOUNT
(7/11/84	PO \$10456 - To purchase TV time for Helms for Senate.	\$437.75
•		RECEIPT & AFFIDAVIT REQUESTED	

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July 18,

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FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27402

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11145 - To purchase TV time for Helms for Senate/ Americans for Reagan.	\$459.00
	RECEIPT & AFFIDAVIT REQUESTED	

Nº 6155

66-30 531

July 18,

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO \$11103 - To purchase TV time for Helms for Senate.	\$620.00
	RECEIPT & AFFIDAVIT REQUESTED	

JEFFERSON MARKETING, INC.

"RO. BOX 19807 . RALEIGH, NORTH CAROLINA 27619

VENDOR

WLOS - TV 288 Macon Ave.

CANDING THE TAX BEAUTY IN THE PARTY.

SHIP TO

Asheville, N.C. 28802

Attention: Ken Glover

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

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PURCHASE ORDER

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MAN SPECIFORAL

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

UNCHASE ORDER DAYE	PARTITION		104	PROOF RE		NO. OF SAMPLES	ACCOUNT
	7-18-84		Maria Maria	1.1	5	REQUIRED	EPS
						LINT PRICE	TOTAL
		hase :30 tele ate Committee	vision time f	or Helms			
	Ad	s to be annou	nced				
	Ads to	run Fri. July	20, - Thur.	July 26,	1984		
	M-F Sat. Sun.	7-9a 12-2p 4-6p	Good Mor British Aspen Te	ning Ame Open Gol nnis Pes	rica f tival	10 0100	1000.0 150.0 150.0
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NO CHANGES WILL BE BINDING ON CLIENT LISTE PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

PURCHASING AGENT

JEFFERSON MARKETING, INC. P.O. BOX 19607 • PALEIGH, NORTH CAROLINA 27619

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NO.

THIS NUMBER MUST AFFEAR ON ALL HIVOICES, PACKAGES AND CORRE-

VENDOR

WYFF - TV 505 Rutherford St. Greenville, S.C. 29609 SHIP TO

Attention: Debbie Kay

CLIENT" (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

SPONDENCE

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

To purchase :30 television time for Helms for Senate Committee. Ads to be announced Ads to run Fri. July 20, - Thur. July 26, 198 M-F 7-9a Today Show M-F 11:30-12:30a Tonight Show Wed. 8-11p Baseball Sat. 1-7p Baseball Sun. 9-11:30p Movie "Shogun: Contract # 408305	5 @ 120. 5 @ 140.	TOTAL
Ads to be announced Ads to run Fri. July 20, - Thur. July 26, 198 M-F 7-9a Today Show M-F 11:30-12:30a Tonight Show Wed. 8-11p Baseball Sat. 1-7p Baseball Sun. 9-11:30p Novie "Shogun:	5 0 120.	
M-P 7-9a Today Show M-P 11:30-12:30a Tonight Show Wed. 8-11p Baseball Sat. 1-7p Baseball Sun. 9-11:30p Novie "Shogun:	5 0 120.	
M-F 11:30-12:30a Tonight Show Wed. 8-11p Baseball Sat. 1-7p Baseball Sun. 9-11:30p Movie "Shogun:		
	3 6 240	
Contract # 408305 1/20- 1/27 8 158		3150.00
	•	472.50
F 170.00 1		\$2677.50
Advertising/Hawley - B SA 350.00 Das Su Q00.00 DD	50	
CHECK ATTACHED: RECEIPT 1510.00		

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

PURCHASING AGENT

JEFFERSON MARKETING, INC. P.O. BOX 19807 • RALEIGH, NORTH CAROLINA 27618



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VENDOR WETV 1 Julian Price Place Charlotte, N.C. 28208

SHIP TO

Attention: Sandy Merritt

CLIENT (BILL TOmefferson Marketing,



BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER. BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

7-9-8		17-84		ITEMS LISTED SELOW		REQUIRED	EPS
Arrani.	Carried A	113	PLEASE SUPPLY	THE CATE OF CALL	STORY OF THE STORY		Maria Carallana
		To purch Senate (ase :30 televiousittee. Ads to be		for Helms for		
		Ads to 1			July 26, 198		
		H-F	7-9a	CBS Morn	ing News	5 e 125.	625.00
		H-P	11:30-12a	WKRP		5 @ 350.	1750.00
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		ADVERTIS	ING,		elevision Pur	chase	
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P.O. BOX 19607 • RALEIGH, NORTH CAROLINA 27619

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VENDOR

WSOC - TV 1901 N. Tryon Rd. Charlotte, H.C. 28234

Attention: Mark Johnson

CLIENT (BILL TO)

Jefferson Marketing, Inc.

SHIP

TO

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO SE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

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	Ads to ru	n Fri. Jul	y 20 - Thur. J	uly 26, 1984		
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NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

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P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27619

Telefalate original

NO. 11005

THIS NUMBER MUST APPEAR ON AL INVOICES, PACKAGES AND CORRE-SPONDENCE 2006

VENDOR

WPCQ-TV 8036 Hood Rd. P.O. Box 18665 Charlotte, M.C. 28218 Attn: Frank Mack

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

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		Senate	rchase :30 to Committee.	annou	noed				
		Ads to	run Fri. J	aly 20	-Thurs.	July 26,	, 1984		
		N-F Wed Sun	7-9A 11:309-12: 8-119 9-119	30A	Today Tonight Basebal Shogun			50 45 50 125	225.0 625.0 600.0 800.0
							gross		\$2250.0
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PURCHASE ORDER.

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

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P.O. BOX 19607 . RALEIGH, NORTH CAROLINA 27619



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NO.

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THE HUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRE-SPONDENCE 2906

VENDOR WENT-TV

Phillips Ave. & White St.

P.O. BOX TV2

Greensboro, N.C. 27420

Attn: Jefffsales

SHIP

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND ARREST THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

Ar Country Continues of	104	PHOTOF HEQU	NO. 0	F SAMPLES	ACCOUNT
-17-64			REQU	HRED HT PRICE	TOTAL
To purchase 13 Senate Committe Ads to run Fr: N-F 6-8A Good Sat 4-6P Olymp	to be announced i. July 20-Thurs. Morning Show pic Basketball vs	for Helms i	for 84 5 (90 450	450.00 450.00 8 900.00
Advertising, CHECK ATTACE	1/20 90.00 1 450.00 540.00	sion Purch	1		\$ 765.00

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

RPH J

P.O. BOX 19807 • RALEIGH, NORTH CAROLINA 27619

NO.

SHIP

TO

2906

THE NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRE-SPONDENCE.

Marie Elektrick (1984)

VENDOR WGGT WGGT TV 330 S. Green St. Greensboro, N.C. 27401

Attention: Towny Schenck

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

7-9-84		7-84	JOB NAME		7.0.6	V CONTROCT REQUIRED	NO. OF SAMPLES	HPS
3400	UAKITIY			PLEASE SUPPLY	THEMS LISTED SOLOW:	3,00	UNIT PRICE	TOTAL
		for 8	ienate	Ads to be	vision time for announced 20 - Thur. Ju			
		H-F H-F		7-7:30p	WKRP Camelot Spe CBS Morning	cial	3 @ 100. 2 @ 200. 5	300.00
						gross		700.00
						less 15		105.00
						net	1	\$595.00
		Adver	tising	g/Seiber/f	l - HPS - Tele	7/20 . 7	122	
		CHECK	ATTAC	HEDTRECEI	PT & AFFIDAVIT	10	0001	
							1	

P.O. BOX 19807 • RALEIGH, NORTH CAROLINA 27619

PURCHASE OFFER

NO. 11000

THE NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRE-SPONDENCE.

VENDOR

WXII-TV
700 Coliseum Dr.
P.O. Box 11847
Winston Salem, N.C. 27106
Attn: Sack Manning

SHIP TO

CLIENT (BILL TO)

Jefferson Marketing, Inc.



BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE POR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

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	Senate Committee	television time for be announced	Helms for		101. 11 19 11 19 12 1944
		July 20-Thurs. July	26, 1984		
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			gross		\$2150.00
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			*		\$1827.50
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NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

RPH

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P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27619

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2806

VENDOR

WCHP - TV 2005 Francis St. High Point, N.C. 27261 SHIP

Attention: Charlie Davis

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER

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MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

	DATE (MICHAELD		1.01	ĭ	N O	NO. OF SAMPLES	HPS
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	To pu Senat	rchase :30 to ce Committee.	elevision ti		as for		
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				gr le	oss 88 15%		4240.0 636.0
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				1,240.00			

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

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P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27619

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NO. THE HUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORNE-

2623

VENDOR WRAL - TV

2619 Western Blvd.

SHIP TO

Raleigh, MC. 27605

Attention: Quinn Koonts

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

SPONDENCE.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

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THE RESIDENCE AND ADDRESS OF ALL -INVOICES, PACKAGES AND CORRE-SPONDENCE.

2623

VENDOR WPTS - TV

410 S. Salisbury St. Raleigh, N.C. 27710

Attention: Bob Buselli

SHIP TO

CLIENT (BILL TO)

defferson Marketing, Inc.

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

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	for Sen	hase :30 televisiate Committee. s to be announced run Fri. July 20, 11:30-12:30a 7-9a 7:30-8p 9-11:30p 8-11p	i , - Thur. July	7 26, 1984 7	5 e 15. 5 e 15. 2 e 125.	450.0 2 350 0
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:	Contract	: \$ 67: 7/20		net		\$ 935.0
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NO CHANGES WILL BE BINDING ON CLIENT LISTED ON TH PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS G

POR GRASIE ORIOTER 2623

THE HUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.

VENDOR

WIVE - IV 411 Liberty St. Durham, M.C. 27710 SHIP TO

Attention: Chuch

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

	7-18-84		101	PROOF REQUIRED	NO OF SAMPLES REQUIRED	ACCOUNT
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	for Se	enate Committe	ounced			
			ly 20, - Thur. Ju		5 € 50.	250.0
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			U)20 (1/22 5000 1		\$212.5
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	CHECK	ATTACRED: RECI	EIPT & AFFIDAL			
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	- 144,1				1	•
171-1-1						

P.O. BOX 19807 • RALEIGH, NORTH CAROLINA 27619

NO. 11057

THE NUMBER MUST APPEAR ON ALL
INVOICES, PACKAGES AND CORNS.

VENDOR

WNCT - GY 3221 Evans St.

PUNCHASE ONDER DAYE | DAYE REGUNED | JOB NUMBER |

Greenville, N.C. 27834

Attention: Bob Peretik

SHIP

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS FURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

PONDENCE

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

PROOF REQUIRED ACCOUNT

3	PUNCHASE ONDER DATE	DATE RECLURED	1.09 /4.49881	F.O.E	PHOOF RECOINED		ACCOUNT
	7-10-84	7-17-84			ž o	NO. OF SAMPLES REQUIRED	HPS
-	SWEETER - GIVE	1 . · · · · · · · · · · · · · · · · · ·	PLEASE	BUPPLY ITEMS LISTED SELOW . ST		Y UNIT PRICE	TOTAL ?
1				elevision time	for Helms for		1410 La
-		Senate	e Committee.				
			Ads to	be announced			
1							
-		Ads to	o run Fri. Ju	uly 20 through	Thur. July 26,	1984	
2		Sat.	4-6p	CBS Sport			85.00
-		F, N-Ti	h 8-9a	CBS Normi	ng Hyws	5 e 40.	200.00
					gross		285.00
					- Anna Cara		
	A.			95.00	less 15t		42.75
	t		1/20		net		\$109.25
4	-		1 0	05.00			242.25
-	4			10 1			
			5	4 10	V -		
1	4	ydveri	tising/Dan (125.	chase		
			ATTACHED: R	1	QUESTED		

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F.O.E.

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

PAL

SPONDENCE.

THE NUMBER WEST APPEAR ON ALL INVOICES, PACKAGES AND CORRE-

27889

VENDOR WITH - TV

Highway 17 South Washington, N.C.

Attention: Frank Brady

CLIENT (BILL TO)

Jefferson Marketing, Inco

SHIP TO

> BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

> MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

UNCHASE CACES CATE DA	-10-84	7.4	PROOF REQUIRED	NO OF SAMPLES	HPS
CUMMING CUMMING	A rest Contract Contract	THE RESTREE STATE OF THE PARTY	THE COUNTY COMMENT	ONT PROE	
	Ads to run in the sat.	Ads to be announced Fri. July 20 - Thur. J 7-9a Today Show 11:30-12:30a Tonight 1-4p Michigan S 4p-cc Major Leag	Show one baseball gross less 154	5 @ 30. 5 @ 35.	150.00 175.00 100.00 125.00 550.00
	Advertising	Dawson/f1 - ~~~	net		\$467.50

P.O. BOX 19807 • RALEIGH, NORTH CAROLINA 27619...



SHIP

TO

PURCHASE ORDER

2623

YIHE NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRE-SPONDENCE.

VENDOR

WCTI - TV
Park Ave, Glen Burnie Gardens
New Bern, N.C. 28560

Attention: Archie Russell

CLIENT"
(BILL TO)

Jefferson Marketingg Inc.

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

MCHASE ONDER D			REGIMUM GOL	10.1	Y E	N O	NO OF SAMPLES	ACCOUNT
7-11-84	11-	17-84	/= /	NE SUPPLY TITING LISTED RELOW	\$	19	AEQUIAED	HPS
		To pure	chase :30 to Committee.	eleviséen time f	or Helms	for		
		19 - 12 - 1	run Fri. J	be announced aly 20 - Thur. J				
		F,M-Th Thur. Sat.	7-9a 8-cc 5-6:30p	Good Morni Olimpic Ga Wide World	122		10 @ 35	350.00 240.00 60.00
					gross			650.00
-					less 1	15%		97.50
				7/20-1/ 0/11 - 20-3 CRIPT & FR	27) 70.0			\$\$552.56
			Lsing/Dawson	CRIPT & FR	130	(o)		

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

RPH

P.O. BOX 19807 FRALEIGH, NORTH CAROLINA 27619

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SHIP

TO

PURCHASIE ORIDIES

NO.

11067

THE HUMBER MUST APPEAR ON ALL SYCICES, PACKAGES AND CORRE-SPONDENCE

VENDOR

WECT - TV

322 Shipyard Blvd.

Wilmington, N.C. 28403

Attention: Ann Roberts

CLIENT (BILL TO)

Jefferson Marketing, Inco

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

7-12-84	7-12-84			ĭ	N O	NO OF SAMPLES REQUIRED	HPS
Control of the Contro	ANTITY	PLEA	SE SUPPLY ITEMS LISTED SOLOW			UNIT PRICE	TOTAL
:		e COmmittee	television ti		lms for		
•	Ads t	o run Fri.	July 20 - Thu	r. July 20	5, 1984		
	SHEETER Mee'Elex		draftwoodfpack	axitaxisix			2070
-	SHREX M-Th F,N,T Wed.					4 e 50. 5 e 45:	80.00 200.00 225.00 300.00
-		7/2	w 7/22	gros	15%		805.0
:		=	7/22	net			\$684.00
•	Mover	tising/l	80.001	Purcha	180		
	CHECK	ATTACHI	80.00 t 45.00 t	T REQU	ESTED		

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

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7157

THE NUMBER MUST APPEAR ON ALL INVOICES. PACKAGES AND CORRE-SPONDENCE.

VENDOR

WWAY - TV

615 N. Front St.

Ty Watts Attention:

Wilmington, N.C. 28401

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

	AMANAN BOLL CIRMON BY	F.O.S. Y	N O	NO OF SAMPLES	ACCOUNT
7-12-84 7-	-12-84 RAME RU	PPLY ITEMS LISTED SELOW		UNIT PRICE	TOTAL
	To purchase :30 tell Helms for Senate Con Ads to Ads to Fun Fri. July Mon. 8p-cc F,M-Th 7-9a Thur. 8p-cc Fri. 8-11:30p Sat. 5-6:30p	levision time for Hermittee. be annoughed by 20 - Thur. July 2 Monday Baseball Bood Morning An ABC Sports Olympaseball Wide World of S	erica pic Gala sports cross	10 e 30	225.00

SHIP

TO

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN. 174

P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27819

HORIOTEKATE ORIOTEK

NO.

THE NUMBER WAS TOPED ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.

VENDOR WLOS - TV 288 Macon Ave.

CLIENT (BILL TO)

Asheville, N.C. 28802

Attention: Kln Glober

Jefferson Marketing, Inc.

SHIP TO

> BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

To purchase :30 television time for Helms for Senate Counittee. Ads to be announced Most to run Mon. July 16 - Sun. July 22, 1984 M.W.F 7-9a Good Morning America 3 @ 100. 300. 5 @ 150. 750. 300. 5 @ 150. 750. 300. 5 @ 150. 750. 300. 5 @ 150. 750. 300. 5 @ 150. 750. 300. 5 @ 150. 750. 300. 5 @ 150. 750. 300. 5 @ 150. 750. 300. 5 @ 150. 750. 300. 5 @ 150. 750. 300. 300. 5 @ 150. 750. 300. 300. 5 @ 150. 750. 300. 300. 5 @ 150. 750. 300. 300. 5 @ 150. 750. 300. 300. 300. 300. 300. 300. 300. 3	7-5-84	7-5-84	JOB NUMBER	1.0	š	PHOOF REQUIRED	NO OF SAMPLES REQUIRED	ACCOUNT
Senate Committee. Ads to be announced	William Control	inger Care	A Company of the Company	PLEASE SUPPLY ITEMS L	METED BELOW 1997		UNIT PRICE	TOTAL
CHECK ATT 30.00 DAVIT REQUESTED		Ads (M,W,) M-F Sun. Tue.	Ads to run Mor 7-9 12: 12: 52- 7-7	to be and 1. July 16 2a	counced - Sun. July Good Morning M Rotation Howsmakers Hightline Mic Tac Dough	22, 1984 America ross	5 @ 150.	300.00 750.00 30.00 350.00 1460.00 219.00 \$1241.00
CHECK ATT		Adve	rtisi	10000 V	ssub levison	Purchase		A
280.00		CHEC	K ATT	280.00 V	DAVIT R	eqsested		

P.O. BOX 19607 . RALEIGH, NORTH CAROLINA 27619.

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SHIP

PURCHASINGROFF

No. 10947

WORKER PAGEAGES AND CORNE-SPONDENCE.

VENDOR

WSPA - TV

I-85 & I-26 Spartenburg, N.C. 29304

Attention: Ray George

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

SCHARLE CONCESTORY	SALCONA - SELECTION OF	(.)	PROOF REQUIRED	NO. OF SAMPLES	ACCOUNT
-5-88 7	7-5-84		¥ 8	REQUIRED	HPS
STATE OF STA	र्गा सम्बद्धाः स्थापना । अस्ति । अस्ति । ।	PLEASE SUPPLY ITEMS LISTED SOLO		LINT PRICE	TOTAL
	To purchase :3	0 television ti	me for Helms for		
	Ada	to be announce	d		
	Ads to run Mor	. July 16 - Sun	. July 22, 1984		
	N-F 12:	30-4p PM Rot	ation	5 e 250.	1250.0
			less 1	5 .	187.5
		1/20.7/22	net		\$1062.5
	Advertisis	250.001	evision Purchase	•	
	CHECK ATTA		AVIT REQUESTED		
				- 31	
				=1_0.	

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27619

NO.

THE NUMBER MUST APPEAR ON ALL SPONDENCE.

PURCHASE ORDER

2905

VENDOR

WYFF - TV

505 Rutherford St.

Greenville, S.C. 29609!

Attention: Debbie Kay

CLIENT (BILL TO)

Jefferson Marketing, Inc.

SHIP

TO

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

7-5-84		5-84	1		0.8	ř	N O SHEIZUIRED	NO. OF SAMPLES	ACCOUNT
SACCE AND	diversity.		10 10 10 mg	AGE GLIPPLY (TOM	CUSTED BELOW	1-1	2750		TOTAL
	TTWWIT	Ads to r	Ads to Mon.	o be an July 16	nounced - Sun. S Today Sho PM Rotati Donahue	fuly 22, W Lon		3 @ 120 10 @ 260. 2 @ 185.	2600.00
						gro		grossgra	=8330.0 0
-								less 15%	499.80
•				1/20 -	7/42			net	2830.50
-				24	10.00 V	111			
				21	10.00 V			1	
		Advertis	ing/H		95.001	ion P	urchase		
•		CHECK AT	TACHRI	7	05.00	REOU	ested.		
						-			
						W.			

P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27619

PHORIOTERALISMONIO NO.

2905

THE NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.

VENDOR WETV

1 Julian Price Place Charlotte, N.C. 28208

Attention: Sandy Merritt

SHIP TO

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

	7-S-SA	7.0.1 Y	NO N	NO. OF SAMPLES REQUIRED	HPS
	7-5-84	SUPPLY MINIS CISTED BELOW		LANT PRICE	TOTAL
	Ads to run Mon. July (2) M.T.W. Th 12:30-(2) F	12:30p Top of the Day Little House CBS Morning New	, 1984	7 @ 275 5 @ 225. 4 @ 400 3 @ 125.	800.0 375.0
•	M, W, P 6-7a	Good Morning Sh	OW	3 6 65.	
•	T, Th 5-6p	Hawaii 5-0	waii 5-	2 @ 275.	550.0
-		gro			4970.0
•	7/20	· 7/22 des	s 15%		745.0
•		net			4224.5
	This is a	275.00 × be repeated 275.00 × -22 -29 b5.00 √ 3-29 -4 -12	t å d		•
	Weekly pa				
•	Advertisi	levision	Purchase		
12.0	CHECK ATT	DAVIT REC	WIESTRO		

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

P.O. BOX 19607 . RALEIGH, NORTH CAROLINA 27619

BNOICES, PACKAGES AND CORRE-SPONDENCE.

2905

VENDOR WSOC - TV 1901 M. Tryon Rd.

Charlotte, N.C. 28234

Attention: Mark Johnson

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS INDICAMES CROSS. PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

7-5-84	7-5-84			¥	No.	NO. OF SAMPLES REQUIRED	MPS
in a		PLEASE BU	PPLY FTONIS LISTED BOLOW		1/2	LINET PRICE "	TOTAL
	Senate o	Ads to 1	sion time for He				
	Ms to r	un Mon. Jul	ly 16 - Sun. Aug	12,	1984		
	r,sa,su n,r	2-6a 7-9a	News All Ni Good Mornin		rica	3 e 10 2 e 200.	30.0 400.0
•				gros	155		430.0
.]	THE STATE OF THE S			less	15%		64.50
				net			\$365.50
	This is	a weekly so	chedule to be re	peate	sd.		
			July 16-22 July 23-29 July 30-Aug Aug. 6-12	.5	7/2	v - 7/22	
	Weekly p	ayment of a	365.50		10.	230.00 230.00	_
	Advertis	ing/Seiber	- HPS - Televis	on Pu	irc		
	CHECK AT	TACHED: RECE	EIPT & AFFIDAVIT	REQU	E	10.00	

SHIP TO

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

- P.O. BOX 19807 . RALEIGH, NORTH-CAROLINA 27619

PROPRIORIES POR OPERATE POR OP

INVOICES, PACKAGES AND CORRE-

THE NUMBER MUST APPEAR ON ALL

2905

VENDOR

WPCQ - TV 8036 Hood Rd. Charlotte, N.C. 28218 SHIP TO

Attention: Frank Nack

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

PONDENCE.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

7-9-84	7-9-84			ž	8	NO OF SAMPLES REQUIRED	EPS
SANTUA CO	AND A CONTRACTOR	PLEASE BLAN	LY ITEMS LISTED DELEGIS	CHAPTER SERVICE		UNIT PRICE	TOTAL
	Senate (ase :30 tele committee.					
	Ads to z	ade to be	10 - There	July 🕊	1984		
	N-F	9a-2p	Day Rotat	ion		10 e 50.	500.00
		1		1.00	s 154		75.00
				net		,	\$425.00
	This is	a weekly sch	edule to be	repeated			
			July 16-2: July 23-2: July 30-A: Aug. 6-12	9 ug. 5	1/20	- 7/22	
	Weekly p	expment of \$	425.00		-0	5000 6	
	Advertis	ing/Seiber/f	l HPS - Teler	vision P			
	CRECK AT	TACHED: RECEI	PT & AFFIDEV	IT REQUE			

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

AS RIH

P.O. BOX 19867 . RALEIGH: NORTH CAROLINA 27019

PURCHASE CROPS

THE NUMBER MUST APPEAR OF ALL INVOICES, PACKAGES AND CORNEL-SPONDENCE

2905

VENDOR WCCB - TV 1 Television Place

Charlotte, N.C. 28205

Attention: Lori Forslund

SHIP TO

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

		TERROLINA LOS NS	AMEST.	X-X	Y	N O	NO. OF SAMPLES REQUIRED	ACCOUNT
7-5-84	quanty:		PLEASE BUP	PLY ITEMS LISTED SELOW"	18.50 F.	यर :श्र्	UNIT PRICE	TOTAL
:		To purcha Senate Co	se :30 tel	evison time for	r Helm	for		
		100	Ads to	be announced				
		Ads to ru	n Mon. Jul	y 16 - Sun. Au	gust 1	2, 1984		
:		Sun. Sat. Sun. Sun.	4-6p 9-10a 2-4p 6-7p	Sun. Big To Gunsmoke Sun. Cinema Switch		vie		120.00 50/00 100.00 120.00
					gros			390.0
			1/20.	1/22	less			58.5
-					net			\$ 331.5
•		This as a	13	20.00 E	epeate	đ		
			10	29	g. 8			
1-1								
•			-39	90.00				
		Weekly pa						
•		Advertisi		evi	sion P	urchase		
•		CHECK ATT	PA	AVI	T REQU	ESTED		

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

HS RPH)

P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27619

PURCHASE OFFER NO. CHORR, PACKAGES AND COR PONDENCE.

2905

VENDOR

· WPHY - TV Phillips Ave & White St. Greensboro, N.C. 27420

SHIP TO

Attention: Jeff Sales

CLIENT. (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO HE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

Charles and Charles and Charles	MATERIAL	AND PLANTAGE	1.04	PACIFICATIONS	NO OF SAMPLES	ACCOUNT
7-11-85	7-11-84			3 3	REQUIRED	EFS
Stotler - dit		Control of PLEASES	UPPLY ITEMS CISTED SELOW . 7,000		UNIT PRICE	TOTAL
	Senat	6-8a 6-8a 6-8a 3:58-4p 9-12n 12-4p (2) F 7-9a 2-6a	devision time for announced by 16 - Sun. Au Good Morning Rowartherbre Morning Royalthorning Royalthorning Royalthorning Royalton Religion Movies	g. 5, 1984 ing Show tation ak tation	5 @ 90 5 @ 45 2 @ 125 4 @ 85 7 @ 130 2 @ 40	225.00 250.00 340.00 910.00
	This	/s	3 45.00 1	net apeated July 23-2 July 30-A		\$1925.25
	10 10	y paymen tising/	40.00 8000	chase		
	CHECK	ATTACE	410.00	T RQUESTED		

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN. TAS RPH

P.O., BOX 19807 . RALEIGH, NORTH CAROLINA 27619

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MANUFACTURE STATE OF THE STATE

NO.

11059

2905

INVOICES PACKAGES WID COUNT.

VENDOR

WXII - TV 700 Coliseum Dr. Winston Salem, N.C. 27106 SHIP

Attention: Sack Manning

CLIENT (BILL TO)

Jefferson Marketing, Inc.



BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

7-11-	· me is a con-	-11-84	OS NAMER		Y	N O O	NO. OF S		HPS
Shorten -	GINNELLA		ATTACK OF PLANT SUPPL	Y ITEMS LETTER BELOW	Mark Inc.		S' UNIT	PRICE .	TOTAL 7
		Senate	Ads to be a						
		Ads to	run Mon. July	16 - Sun. Aug.	12,	1984			
		M-F Th-F M	11-12n 12n 12:30-3p	Wheel/Scrabl Noon News NBC PM Rotal			5 6		
ŀ					gros				635.0
					less	15%			101.2
		This is	1/20. 7	/	net				\$ 57837. 573.7
			and have	0.00 0.00 0.00 levisi	July July Zuly Aug.	16-22 23-29 80-Au 6-12	g. 5		
		Adverti	1 Pm 100 > 1	P. levisi	on PU	rchase			
		CHECK A	ST. STULL	DAVIT	REQUE	STED	1		
- 1				#					

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

HE RPH - J.

P.O. BOX 19807 - RALEIGH, NORTH CAROLINA 27619

NO. 10949

· VENDOR

SHIP .

WHH - TV 3500 Myer-Lee Drive Wanston Salem, N.C. 27101

Attention: Tony Bolloway

CLIENT (BILL TO)

Sefferson Marketing, Inc.

PUR DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

CHASE DADER	DATE DA	TE REQUIRED 105	MUMBER	1,0,6	PROOF REQUIRED	NO OF SAMPLES	ACCOUNT
7-9-84		-84			§ . 0	REQUIRED	EPS
MUERED	QUANTITY		PLEASE SUPPLY	TEMS LISTED BELOW		UNIT PRICE	TOTAL
		Ads to :	Tue. July 7-8p 5 3:30-6p		30, 1984 to 3/week	9 8 70. 3 8 70. 2 8 400.	210.00
					Gross		1640.00
			1		less 15%		246.00
					net		\$1394.00
		M to	run AFS 811 J.	T. KREEK	7/20 - 7/0	00	
		Advertis	ing/Seiber/fl	- EPS 0 Tel			
		CHECK AT	TACERD: RECEIP	T & AFFIDAVI			
						11- 4	

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS
PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN

The state of

P.O. BOX 19807 - RALEIGH, NORTH CAROLINA 27619

2905-INVOICES, PACKAGES AND CORRE SPONDENCE.

VENDOR WGHP - TV 2005 Francis St. High Point, N.C. 27261

SHIP TO

Attention: Charles Davis

CLIENT (BILL TO)

Jefferson Merketing, Inc.



BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS BILL DIRECT TO THE CLIERT. BY ACCEPTING AND POLPILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND PAGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIERT, AND THAT THE CLIERT SHALL BE SOLELY RESPONSIBLE POR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

7-11-84		F.O.B. F.O.B.	PROOF HEQUIRED	NO. OF SA		RES
To purc Senate	hase :30 tel Committee. Ads to be	evisémentime for announced	Helms for	Linery P		TOTAL
Sun. Sat. M,T,F	7-11a 12m-2a	Religion Sat. Movie Th Noon News Grissly Adams ABC News Morn	riller		75.	60.00 30.00 225.00 75.00
. 1/20	· - 3/2 2		gross less 15% net			450.00 687.50 \$382.50
		July 16-22 July 23-29 July 30= Aug. Aug. 6-12 82.50 HFS - Television T & AFFIDAVIT B				

P.O. BOX'19807 . RALEIGH, NORTH CAROLINA 27619

THE GRAPH AND THE REAL PROPERTY.

vo. 11063

THE HUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRE-SPONDENCE.

VENDOR

WRAL - TV 2619 Western Blvd. P. O. Sen 1200 Releigh, W. C. 27605 Attn. Quien Ements SHIP

CLIENT (BILL TO)

Jefferson Marketing

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL IMPORCE IN TRIPLICATE TO JEFFERSON MARKETING FOR

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

-11-64		1-64	LICE INCOME.		(A-)	ĭ	8	NO. OF SAMPLES	ACCOUN
	QUARTITY.	15,000 15.	अन्दर्भ द्वा ।	PLEASE SUPPLY ITS	IS LISTED BOLOW	2 13.00		UNIT PRICE	TOTAL
		Counts	too.	Ads to be	announce		Senate		
		Sem Sem	6a-12# 9-10a 5-6p	Sun Horn Rei	ligion	2, 15,54		2 @ 35 1 @ 100 1 @ 250 5 @ 100	70.00 100.00 250.00 500.00
							gross		920.00
							less 15%		138.00
			1	120.7/22			nat		\$782.00
		GEC	rtisis Karra N	100.7/22 100.9 250. 250. 250. 250.	100 V 00.00	iee Iequested			

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

PURCHASING AGENT

VENIDOD

305

P.O. BOX 19607 - RALEIGH, NORTH CAROLINA 27819

PURCHASE ORDER

THE HUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORNE-

> • • 2905

VENDOR WPTP-TV 410 S. Salisbuty St. P.O. Box 1511 Raleigh, N.C. 27602 Attn: Bob Busselli

SHIP TO

CLIENT (BILL TO)

Jefferson Marketing, Inc.



BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

	7-12-84		ž N	NO. OF SAMPLES	HPS
TO THE OWN		PLEASE BUPPLY ITEMS LIS	THO BELOW AS A STATE OF THE STA	UNIT PRICE	TOTAL
	Senate (Ads to be anno	unced hurs. July 22, 1984		
			Day Rotation	150 15	225.0
	11-7 11-7 11-7	10-3P 11:30-12:30A 6:30-7A	Tonight Show 20 Min Workout	5 015 30 10	75.0 30.0
			gross		\$ 330.0
		7/20-7/22	less 15%		49.5
	-	1.20 121	net		\$ 280.5
	Adverti	1/0.00	levision Purchase		
	CHECK AS		DAVIT REQUESTED		

1905

THE NUMBER WAY APPEAR OF AU

VENDOR

WIVD - IV 411 Liberty St.

Durham, N.C. 27702

SHIP TO

Attention: Chuck Martin

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

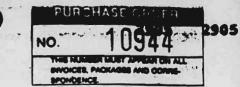
MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

A TANK A PARCE OF THE PARCE OF	TANK COUNTY IN	CY . I International Control of the		ROOF REQUIRED		ACCOUNT
7-12-84	7-12-84	AND PLEASE SUFFLY STEMS LI	Ť	ő	NO. OF SAMPLES REQUIRED	HPR
Spin William	A Property of the Assessment o	PLEASE SUPPLY ITEMS LI	LLED BETON		UNIT PRICE	TOTAL
	To purcha Senate Co	se :30 televisionmittee.	on time for He	lms for		
		Ads to be an	nounced			
	M, Bu, P	12-12:30p	News		3 e 240.	720.00
				x less l	50	108.00
		1/20 7/22		net		\$612.00
		24000;		AVI		
_	Advertisi	1/20 7/20 2/00 ;	TV Purchase			
	CHECK ATT	ACHED: RECEIPT &	AFFIDAVIT REC	MESTED		
	,					
						•

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

SPH.

P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27619



VENDOR WTVD - TV

411 Liberty St. Durham, M.C. 27702

Attention: Plora Norris

ČLIENT (BILL TO)

Jefferson Marketing, Inc.

SILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

UNICHARD CHIL	DAYE MICH	ALEKARI ASA DARA			PHOOF REQUIRED	NO. OF SAMPLES	ACCOUNT
SADEMED	QUALITY S	4		AETHO BELOW:	0	NEQUIRED UNIT PRICE	HPS TOTAL
	Ad M-	er Senate C A ds to run M	:30 televisionmittee ds to be and on. July 16 -12p 12pi -10a 12 -12:30p 13 2:30-4p 13	- Sun. July M Rotation Conshue Hers	, 22 , 1984	2 8 120.	700.00 240.00 480.00 1400.00 2820.00 423.00 \$2397.00
-		Vertising/		ilevis:	REQUESTED		

SHIP

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

RPH

P.O. BOX 19807 - RALEIGH, NORTH CAROLINA 27819

HORIOTAL STATE OF THE STATE OF

10941

2905

INVOICES, PACKAGES AND CORRE-SPONDENCE

VENDOR WNCT - TV

3221 Evans St.

Greenville, N.CX. 27834

Attention: Bob Peretik

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

7-5-84	7-5-84		V V	ð	NO OF SAMPLES	HPS
	Many Services	THE PLANT SHALL	Train LISTED BELOW		UNIT PRICE	TOTAL
	Ads to re	Ads to be un Non. July 9-10a 12:30-4p	16 - Sun. Aug. 12, CBS Morning News PM Rotation	1984	5 @ 35. 3 @ 125.	175.00 375.00
	H-P	7-8a 6-7a			5 6 50	250.00
	M,T,Th,F	10-12n	CBS AM Rotation		4 @ 40.	160.00
1				,		1185.00
			7/20	1/22		177.75
•				21		1007.25
				35.0		
•	This is	a weekly sche	dule to be	125,0	0 1	
			July 16- July 23= July 30-	50.0	00 4	
	- 1		Aug. 6-1.	295.	00	
	Weekly p	syment of \$ 1	007.28	275.		
	Advertis	ing/Dawson -	HFS - Tele			
- 10		ALCOHOL BECETS	T & AFFIDAT			

SHIP

TO

P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27619



SHIP

PURCHASE ORDER

NO.

10940

2905

THE NUMBER MUST APPEAR OR ALL INVOICES, PACKAGES AND GORRES.

VENDOR

WITH - TV Highway 17 South

Washington, N.C. 27889

Attention: Frank Brady

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

	PAYEL	AR CHEVEN D	220 MANUAL		/·X	рясте:	N N	NO OF SA		ACCOUNT
7-5-84		5-84				18	8	REQUIRE		HPS
A CHANGE	- driving			PLEASE SUPPLY I	TEMS LISTED SELOW	<u>C.,</u>		UNIT	PICE '	TOTAL
		for 8	enate	:30 talev Committee. Ads to bun Mon. July	announced					
		M-F M,W,F		12:30-4p 12-12:30p		on Rotatio	on	5 8	35. 30.	175.0 90.0
-		N-F		6-7a	Almenec			3 0	25.	125.0
		N-F		9-12n 5-6p	Morning Little	Rotation		5 4 2 6	30.	150.0
•		*,14		3-0p	DICCIO					
						gros	•		1	640.0
-				1/20 -	7/	less	15%		1	96.0
-				7 30	172	net				\$544.0
					35.00 1		•			
		This	is a w	N	30.00.	repeate	a		1	
-		_		ś	25.00 /	22				
-				á	80.00 V	Aug. 5			1	
		1		12	0.00	ng. 12			- }	
•		Weekl	y pay	1	~ .00	1			- 1	
		ydvez	tisin			evison Pu	rchase			
			LTTA I			AUIT REQU	RETED			

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

KI)

RPH

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P.O., BOX 19807 - RALEIGH, NORTH CAROLINA 27019

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PURCHASE ORDER

1094

2905

NAME HUMBER MUST APPEAL OF ALL INVOICES, PACKAGES AND CONTE-SPONDENCE.

VENDOR SHIP
WCTI - TV TO
Park Ave

Glenburnie Gardens New Bern, M.C. 28560

Attention: Archie Russell

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO SE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

7-5-84			Miles Agence curry ne	IS LISTED SOLOW:	1 1 1 1 1 1 1 1 1 1	8	NO. OF SAMPLES NEGUINED	HP8
	diventa		A SHEET OUTSTAND	IS LISTED BELOW:	418,590	Service Service	UNIT PRICE	TOTAL
						STATE OF THE PARTY	And the second second	
		Ads to run	Ads to be an Mon. July 16 11-4p 7-7:30p	ABC Rotation Wheel of Prople's Company of the Prople's	g. 12, 19 on ortune ourt gross	984	@ 40. @ 135. @ 100.	730.00
				. 50	less 1	58		109.50
-					net			\$-620.50
		This is a	2/20. 7/21	er	epeated			654.50
			40.0		g. 5			
-	0	Weekly pay	140.	00				
•		Advertisin		evi	sion Pur	chase		
-		CHECK ATTA		AVI	T REQUES	TED		

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

RI RI

of her

P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27619

PURCHASE

NO. 10460

THE NUMBER MUST APPEAR OF ALL ... INVOICES, PACKAGES AND CORRESPONDENCE.

VENDOR

W TV- WECT 322 Shipperd Blvd. Wilmington, NG 28403 SHIP

CLIENT (BILL TO)

Jefferson Marketing, INC



BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

			1	8	REQUIRED	HPS
		ME BUPPLY ITEMS (MYND BOLOW)			WOUNT PRICE	Se Setotal
		n for Helms for Se ly 16-Sun July 22,		ttee.		
H-7		oline in the Morni	ing .		5 e 35 5 e 45	175.00 225.00
14-7 18-111 14-7	10-11:3a Nov 12H Hour	raing Notation scenter Six			2 0 35 5 8 35	70.00
14- 14- 14- 14- 14- 14- 14- 14- 14- 14-		n Burns Afternoon Rot. r Magazine			3 @ 35 5 @ 80 5 @ 35	105.00 400.00 175.00
	<i>,</i> ,					
		1/20	1/22		gross	1325.00
			35.0 45.0		less 15%	198.35
			35.0	100	net	1138520
			80.0	100		1126.
			265.	200		
Adve	rtising/ Darso	n- HFS TV :	201.			3
Cher	eck Attached:	Receipt and Arris	EAST modam	1504		239

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

KPH

P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27819

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PROBLEM SERVICE

0. 11

THE HUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRE- 2965

VENDOR

WAY-TV 615 N. Front St.

P.O. BOX 2068 Wilmington, NG 28401 SHIP

CLIENT (BILL TO)

Jefferson Marketing, INC.



BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

7/5/84		PROOF REQUIRED Y N O	NO OF SAMPLES	ACCOUNT
· Shores 9	TAXABLE T	PLEASE SUPPLY ITEMS LISTED RELOW!	UNIT PRICE	TOTAL TOTAL
		To purchase 30 sex. TV Time for HFS Committee. ADDS TO HUM July 16-22 MyF 7-9a Good Morning America M,T,TM,F 12-4p Afternoon Rot. Sum 5-6p Star Search Hat 7-8p Hee Hum Whdel of 7:3-8p Wheel of Fortune	2 @ 30 4 @ 50 1 @ 60 1 @ 90 1 @ 105	60.00 290000 60.00 90.00 105.00
		1/20. 2/22	\$1000	\$15.00
		20 50	less 15%	77.25
		2/20.2/22 2/20.2/20 2/20.00 2/20.00	aet	437.75
		230.00		
		Advertising / Derece- El		
		Colleck attached: RECEIPT & AFFIDAVIT REQUESTED		

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

PPH

P.O. BOX 19607 . RALEIGH, NORTH CAROLINA 27619



MORIONAL SETORIOLER

THE RESIDENT BUSY APPEAL ON ALL -

VENDOR SHIP WLOS - TV TO 288 Macon Ave.

Attention: Ken Glover

Asheville, N.C. 28802

CLIENT (BILL TO)

Jefferson Marketing, Inc.



BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

DACHASE CADEA DAYE	MAY INCOME.	TRANSMIN BOLL	7.0.1	PROOF	DE CHAPTE ()		ACCOUNT
7-18-84	7-18-84			Ě	3	NO. OF SAMPLES REQUIRED	HPS
SHOEMS - SHA	Winds The Control of	A.Mart	LIPPLY INJUSTICATION COLON COLON			1 UNIT PRICE	TOTAL
	Senate	AFR-1 :Def	ericans for Reading Reagan" y 20 - Sun. Jul. News Combo Mews Salute to Gold Medal Niteline David Brin Country Ro	y 22, 1 America Champi kley tation	.984 un's .ons		600.00 175.00 275.00 30.00 100.00 1280.00
				400			
•				net	:		\$1088.00
•			- HFS/AFR - TV			Casinel Pur	wed &

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

P.O. BOX. 19807 . RALEIGH, NORTH CAROLINA 27619



SHIP

PURCHASE ORDER

11157

I HUMBELLEUST AVEAU CHEAL

VENDOR

WSPA - TV

I-86 & I-25

Spartenburg, S.C. 29304

Attention: Ray George

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE QRORR THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS FURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE GLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

DETERMINENT COMPANY	PALE STEEL	ASSESSMENT	1.0.0	PHOM	F HE CHINE O		ACCOUNT
7-18-84	7-18-84			¥ 8	8	NO OF SAMPLES	HPS
The state of the s	" E ME DE DE	THE PART OF PLANT	SUPPLY ITEMÉ LISTED BELOW:			LINET PRICE	TOTAL
			levision time		s for		
	Benate	Committee/A	mericans for 1	Reegan		BL49B	
•		AFR-1 "Def	ending Reagan'				
	222 22		1 20				
	Ads to	run Fri. Ju	ly 20 - Sun.	19TA 55'	1984		
	Sat.	7-8p	Hee Haw				600.00
•				le	ss 15%		90.00
							\$510.00
4				net	5		\$310.00
•	1						
:	Adverti	sing/Hawley	- HFS/AFR -	IV Purcha	50		
1	CHECK A	TTACHED REC	EIPT & AFFIDA	ATT KEQUE	STED		
	718						

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER

NO.

1295 CES. PACKAGES AND CORRE-

CLIENT

(BILL TO)

VENDOR WYFF - TV

505 Rutherford St.

Greenville, S.C. 29609

Attention: Debbie Kay

Jefferson Marketing, Inc.

SHIP TO

> BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

7-18-8		-18-84		I.S.	ĭ	8	NO. OF SAMPLES	EPS
	- divinia.		ENT PARE	SUPPLY ITEMS LISTED BELOW	NS.	1	UNIT PRICE	TOTAL
•								
		To purch Senate C	ase :30 te Dumittee.	levision time for	r Helm	s for		
•			AFR-1 "D	efending Reagan*			1	1000
•		Ads to z	en Fri. Ju	ly 28 - Sun. July	y 22,	1984		
-		Sat. Sun. Sat.	5-6p 4-6p 1-7p	Star Search Sportswork Baseball				150.00 225.00 350.00
•					gr	055		725.00
•					10	ss 15t		108.75
•					ne	t		\$616.25
		Advertis	ing/Hawley	- HFS/AFR - TV	Purcha	se		
•		CHECK AT	TACHED: REC	EIPT & AFFIDAVIT	REQEU	STED		
		130						
								l

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

P.O. BOX 19607 RALEIGH, NORTH CAROLINA 27619

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NO. 11158

STREET STREET STREET AND GOVERN

1895

VENDOR

WHNS - TV

SHIP

Interstate Court at

Pilham Rd.

Greenville, S.C. 29607

Attention: Rick Love

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

DESCRIPTION OF STATE	CAN LE CUINTO	ASSESSMENT OF THE PARTY OF THE	IOI.	PHOOF REQUIRED	(But the later)	ACCOUNT
7-18-84	7-18-84			¥ 8	NO. OF SAMPLES	HPS
STORY OF STREET	THE STATE OF THE S	- PLEA	AR BUPPLY ITEMS LISTED ASLOW		UNIT PRICE	TOTAL
	Senate	AFR-1 "	elevision time Americans for Defending Reag uly 20 - Sun.	an"		
	Sun.	4-6p	Movie			250.00
•		THE I		ķess 15%		37.50
•				net	,	\$212.50
:						
•					1	
:	Advert	sing/Havle	y/efs/afr - tv	Purchase		
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NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

FO. BOX 19807 . RALEIGH, NORTH CAROLINA 27819



PORCHASE ORDER

NO. 11163

SPONDENCE.

VENDOR WBTV

1 Julian Price Place

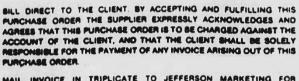
TO

Attention: Dan DuVall

Charlotte, N.C. 28208

CLIENT (BILL TO)

Jefferson Marketing, Inc.



MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

•		ATE REQUIRED		1.0.4	Y	20	NO. OF SAMPLES	HFS
7-19-	QUANTITY	-18-84	NEASE SUPP	LY ITEMS LISTED SOLOW	175.		UNIT PRICE	TOTAL
•••••••••••••••••••••••••••••••••••••••		To pure for Sen	chase :30 telestate Committee AFR-1 "Gmi run Fri. July 6-7p 11-11:30%1: 11-11:30% 9-10:30	Particans for the second secon	or Reading	1984 1988 1988	2 8800	700.0 1600.0 700.0 225.0 3225.0 483.7
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NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

RPH

P.O. BOX 19807 • RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER

NO.

INDICES, PACKAGES AND CORRE-SPONDENCE.

1895

VENDOR

MSOC - TV

1901 N. Tryon Rd.

Charlotte, MC. 28234

Attention: Mark Johnson

SHIP TO

CLIENT (BILL TO)

Refferson Marketing, Inc.

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

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:				vision time ricans for F		ms for		
•		ע	R-l "Defe	nding Reagar	.*			
-		Ads to run	Pri. July	20 - Bun. 3	July 22,	1984		
•		Sat. 4-	5p	Star Sear	rch			225.60
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•					gr	088		\$950.00
•					10	ss 15%		142.50
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2		Advertising	/Miller -	HFS/AFR - 7	TV Purch	Ase		
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1:5	Trible	2.3						
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P.O. BOX 19807 . RALEIGH, NORTH GAROLINA 27619

PURCHASE ORDER

THE NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.

VENDOR WCCB - TV SHIP

1 Television Place
Charlotte, N.C. 28205

Attention: Lori Forslund

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

7-18-84	7-18-84		101	Y	M O M	NO OF SAMPLES	HPS
S. S. M. C.			PROVINCE VARIED BY COMPANY SALES	CONTRACTOR NO.		Court Place	TOTAL TOTAL
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•				le	ss 15%		72,00
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:						numed 4100	
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NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

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MINUST REPEATED ALL

VENDOR WITHY - TV

Phillips Ave & White St. Greensboro, N.C. 27420

Attention: Jeff Sales

CLIENT (BILL TO)

Jefferson Marketing, Inc.

SHIP TO

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

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TO THE	divinit.	J. Company	PLEASE	LIFEY TIENS LISTED BELOW			5 40	UNIT PRICE	TOTAL
		Senate,	AFR-1 "De	levision time or Reagan. Sending Reagan ly 20 - Sun.	an"				
					oury,				75.00
		S/Sun Fri. Sat. Sun.	12-6p 7-7:30 4-6p 6-6:30		ning News				440.00 450.00 525.00
					gr	088	1		1490.00
-					10	ss 1	158		223.50
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NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

P.O. BOX 19607 . RALEIGH, NORTH CAROLINA 27619

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NO 11160

THE HUMBER HUET APPEAR ON ALL INVOICES, PACKAGES AND CORRE-

VENDOR WXII - TV

700 Coliseum Dr.

Winston Salem, N.C. 27101

Attention: Sack Manning

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGRES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

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7-18-84	7-13-84	PLEASE SUPPLY	TOME LISTED SOLOW : 10 1 10 7	or Registration		Land Street Control of the Control o	
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NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

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P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27619

NO.

VENDOR WOLD - TV 2005 Francis St. High Point, M.C. 27261

SHIP TO

Attention: Charlie Davis

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS FURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

7-18-84	7-18-84	NW (A)	301	PHOOF	N O	NO. OF SAMPLES	HPS
		PLEASE BLE	PLY ITEMS LISTED SELOW " " "		11	UNIT PRICE	TOTAL
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•			- HPS/APR - TV I	Purcha	se		

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27619

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1895

CLIENT

(BILL TO)

VENDOR WPTF - TV 410 S. Salisbury St. Raleigh, NC. 27601

SHIP TO

Attention: Bob Buselli

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND PUNCHASE UNIVER THE SUPPLIES EXPRESSLY AGRICUMLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE AGOOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL SE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

DATE INCLUSED AND INCLUSION FOR	PROCES REQUIRED	NO. OF SAMPLES REQUIRED	HPS
7-10-04 Residence made commo deposition		UNIT PRICE	TOTAL
To purchase :30 television time Senate Counittee/Americans for I AFR-1 "Defending Reaga Ads to run Fri. July 20 - Sun. S	for Helms for Reagan. In 22, 1984 Vens Story less 15% net	2 @ 35.	70.00 \ 10.50 \$59.50

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27619

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THE RUMBER HUST APPEAR OF ALL INVOICES, PACHAGES AND CORRE-SPONDENCE.

1895

VENDOR WIVD - TV

CLIENT

411 Liberty St. Durham, N.C. 27710

Attention: John Pearcy

SHIP TO

(BILL TO) Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL SE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS FURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

-19-		7-18-84		7,0,4	ž i	N O	NO. OF SAMPLES REQUIRED	HIPS
Slories.	distant		Water Care	AE SUPPLY ITSMS LISTED BOLD	W. A. STORY		UNIT PRICE	TOTAL
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NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

P.O. BOX 10007 - RALEIGH, NORTH GAROLINA 27618

SHIP

THE CHASE CHOISE

io. 11154

THE HUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRE-SPONDENCE.

VENDOR

WLFL - TV

2410 Broad St.

Durham, N.C. 27704

Attention: Lon Moralli

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

7-18-84	7-18-84	ASS COMMON A	1,0,0	PAGG	REQUIRED	NO OF SAMPLES REQUIRED	EFS
		TE THE PLANE	SUPPLY ITEMS LISTED BOLOW -	कुरक्री सम	3.5 MH W	"UNIT PRICE	TOTAL
	for Sen	AFR-1 DD	levision time ec/Americans i efending Reags ly 20 - Sun. 3	or Reagai un"	n.		
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NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

Alt

P'O. BOX 19807 - RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER

NO. - - 11-142

THE NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND GORRE-SPONDENCE 1895

VENDOR

MMCT - TV

3221 Evens St.

Greenville, N.C. 27834

Attention: Bob Peretik

CLIENT (BILL TO)

Jefferson Marketing, Inc.



SHIP

TO

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

7-18-84	7-18-				Y	8	NO. OF SAMPLES	HPS
To the second		(A.E.)	PLEASE SUPP	LY ITEMS LISTED BOLOW	*	7 P. S.	UNIT PRICE	TOTAL
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			so Ling/ Dawayii	at of rain				
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NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

RVH Jan

P.O. BOX 19607 . RALEIGH, NORTH CAROLINA 27619

NO. 11152

HIS RUMBER MUST APPEAR ON ALL SPONDENCE PACKAGES AND COMMESPONDENCE.

VENDOR

WITH - TV

SHIP

Highway 17 South

Washington, NC. 27889

Attention: Frank Brady

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

7-18-	10.6	7-18-84	NAME A	J1	Y	N O	NO. OF SAMPLES	HPS
Stating.			- Anna	PALY FRAME LISTED MECON		1.0	UNIT PRICE	TOTAL
		Senate C	n-1 Doefend	evision time for pricans for Reading Reagan" y 20 - Sun. July	gan.			
								140.00
		Sun.	6:30p	News Baseball				125.0
		Sat.	7-8p	Ree Haw				130.0
-					gr	055	,	395.0
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NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

RPY I'M

P.O. BOX 19807 . RALEIGH. NORTH CAROLINA-27619

SHIP

TO

NO:

1895

THE HUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.

VENDOR

weri - TV

Park Ave.

Gles Burnie Gardens

New Bern, N.C. 28560

Attention: Archie Russell

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS BILL DIRECT TO THE CLIENT. ANY ACCEPTING AND POLITICATION THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO SE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

7-19-04	7-18-84		7.07	Y NOOF BEGUNA	NO. OF SAMPLES	MPS
Should with	A STATE OF THE STA	PATER STORY OF PLEASE SUPP	LY FRAME LISTED BELOW:		YOUR LINET PRICE	POTAL
	To pur Senate	chase :30 tele /Americans for /R-1 "Defending	rvision time for Resgan.	r Helms fo	or 4	175.00 100.00 60.00 335.00 50.25
			- HFS/AFR - TV		<u>D</u>	\$844.75

P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27619



NO. 11143

1895

THE NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.

VENDOR

WECT - TV

322 shipyard Blvd.

Wilmington, M.C. 28403

Attention: Ann Roberts

CLIENT (BILL TO)

Jefferson Marketing, Inc.

A SE PU MA

SHIP

TO

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

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7-18-	QUANTITY.	-18-84		SUPPLY PRINCIPATED ORLOW	10530, 87	- in 2	LINE PRODE	
•		To pure senate	Committee/	elevisionttime Americans for Defending Rea	Reagan.	ms for		
•		Ads to	run Fri. J	uly 20 - Sun.	July 22,	1984		
•		Sat. Sun. Sat. Sun.	11:30 12:30-1p 1p-oc. 6:30	Bevs	Press			125.00 60.00 80.00 250.00
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NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27619

PURCHASE GROER

NO. 11145

1895

THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.

VENDOR WWAY - TV SHIP
615 N. Front St. TO
Wilmington, N.C. 28401

Attention: Ty Watts

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

7-18-6		18-84		J-) \	Y	N O	NO OF SAMPLES	HPS
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		Sun.	11-1p 2:30-3p	Baitish Open Olympic Dreams	gro	s 15%		50.0 540.0 81.0 \$459.0
:				OR - HFS/AFR - TV				

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

RAH 1/10

FEERSON MARKETING,

CX 9807 • RALEIGH, NORTH CAROLIE 7

CLIENT

(BILL TO)

VENDOR WLOS - TV 288 Macon Ave. Asheville, N.C.

Attentions

SHIP TO

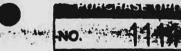
BILL DIRECT TO THE CLIENT. BY ACCEPTING AND PULPILLING THIS PURCHASE GROEN THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THE PURCHASE GROEN IS TO BE CHARGED AGAINST. THE ACCOUNT OF THE CLIENT SHALL BE SOLELY MESPONSISE FOR THE PAYMENT OF THY INVOICE ARISING OUT OF THIS PURCHASE GROEN.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR PORWARDING TO CLIENT.

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		nhaen hele	vision time for	Helma don Sans		
	Commit		Watton Cres 101	MOTING TOT DOWN		
	APR-1	*Defending	Reagan" :30			
				1004		
			July 23 - Fri. J			
	2 Mon	7-9a	Good Morning	America	6 9 100.	600.00
	H-P	12-12:30	Mightline			750.00
V V 54	H-F	5 & 11	Menrs Combo			
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		•		less 15%		562.50
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	Advert	ising/Revi	ey - HFS/AFR - T	V Purchase		
	CHRCK	ATTACHROAD	ECRIPT & APPIDAY	IT REQUESTED		
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		M T				
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		. 19 5				

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS.GIVEN.

BOX 19807 • RALEIGHT NORTH CAROLINA 27618



vo.

VENDOR

A CONTRACTOR

WIFF TV 505 Rutherford St. Greenville, S.C. 29609 SHIP

Attention: Debbie Kay

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT, BY ACCEPTING AND PULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST. THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT, SHALL BE BOLLLY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THE PLYCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR PORWARDING TO CLIENT.

	7-16-0	7-16-84		The state of the s		Y Y	8	NO. OF SAMPLES	
2 5 0 3 0 5 0 4 3 7 1		To pur Counti AFR-1 Ads to \$20m 1 T-F	rchase to the control of run Mondo 7-	ing Reagan" m. July 23	ime for 1 :30 - Fri. J	lelms fo	z Seq 1984		
				D:RECEIPT &					

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

Lat Cay Alt O Jones

CONTRACTOR OF STREET

VENDOR

WBTV 1 Julian Price Place Charlotte, N.C. 28208 SHIP TO

Attention: Dan Duvall

CLIENT -

(BILL TO)

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SCIELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR PORWARDING TO CLIENT.

7-16-84	7-16-84		Section 1 Property Property Section 1	ž	8	NO. OF SAMPLES REQUIRED	1 73
	To pu Couni AFR-1	rohase te ttee. "Defendi	levision time for and an angle Reagan" :30				
,	H-F ThyP ThyP	7-9a To lip	CBS Morning : Rvening Hews Late News	Henrs	7.30		625.00 1400.00 1400.00
		•	n e	gros	15%		3425.00 513.75
				net		V * 1	\$2911.25
vertising/	Adver	tising/ -	HFS/AFR - TV Purc	hase/Ni	ller		
	Adams	trinkey!	PECEIPT & APPIDAY	IT REQU	ESTED		

MARIE CHANGE

VENDOR WEOD - TV1901 1901 M. Tryon Rd. Charlotte, N.C. 28234

SHIP TO

Attention: Mark Johnson

CLIENT (BILL TO)

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREED THAT THIS PURCHASE ORDER IS TO SE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL SE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL MYOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR PORWARDING TO CLIENT.

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	To pur Commit AFR-1 Ads to M-F ThyF M-F	chase televities. "Defending run Mon. J	Reagan" :30 Tuly 23 - Fri Good Morn Mash/Mers Hightline	July 27, ing America	1984	5 0 200. 2 0 600. 5 0 350.	1000.00
			r - HPS/AFR CRIPT & AFFI	net			\$3357.5 0

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.



MONITOR PORTOR

VENDOR

THE WAY

WPCD - TV 8036 Hood Rd. Charlotte, N.C. 28218' SHIP TO

Attention: Frank Makk

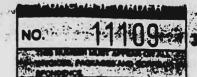
CLIENT (BILL TO)

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT. OF THE CLIENT, AND THAT THE CLIENT GHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEPPERSON MARKETING FOR FORWARDING TO CLIENT.

-16-84	(*)); (com *)	5-84			Y S	8	NO. OF SAMPLES REQUIRED	
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		To pur Commit	chase tels	vision time	for Helms	for Sea	ato	
		APR-1	*Defending	Reagan"	30			
		Ads to	run Mon.	July 23 - 1	ri. July 27	, 1984		
1.5	Liv	H-P	7-9-10 10	Today,	thow		5.0 45.	225.00
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	·				net			\$191.25
	214		• 1					7.2
			•					787 H
		Advert	ising/Mill	er - HPS/AI	R - TV Purc	hase		
		CHECK	ATTACHED: R	ECEIPT & AF	PIDAVIT REQ	UESTED		
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			11					
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NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN. RON Jane



VENDOR

SHIP TO

MIMI - IV Phillips Ave. & White St. Greensboro, W.C. 27420

Attention: Jeff Sales

CLIENT

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT, SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

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-16-84 Selection (18)	7-16-84	Candarice was executed and on a district present was the state of the same	8 8	NO. OF SAMPLES REQUIRED	EPS
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	To purchase tel	evision time for Re	lms for Seni	ato	
	AFR-1 "Defending	g Reagan" :30			
	Ads to run Hon.	July 23 - Fri. Jul	y 27, 1984		
=	M-F 7-9a Th:F 6p Th.F 119	Good Morning & Wevs	ibov O m Se	5 @ 100. 2 @ 525. 2 @1100.	
			gross		3750.00
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	- 1		net		3187/50
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		5	•		
- 1 Y	Advertising/Daw	son - HPS/AFR - TV	Purchase		i i
- E x	CHECK ATTACHED:	MECKIPT & APPIDAVIT	REQUESTED		
2112			,	7575	eria n
					1012

P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27619

VENDOR

SHIP

WXII - TV 700 Coliseum Dr. Winston Salem, N.C. 27106 TO

Attention: Tack Manning

CLIENT (BILL TO)

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND PULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE CROSS IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT-OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

7-16-1		7-16-84			1 8	NO. OF SAMPLES	EPS.
			rchase tel	levision time for			
	-	17	7	ng Reagan" :30			
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					gross	•	1400
					less 15 %	,	210.00
					net	THE T	\$1190.00
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		Adver	tising/Day	son - HFS/AFR -	TV Purchase		
1		CHECK	ATTACHED:	RECEIPT & AFFIDA	AVIT REQUESTED	-	
			A CLIENT LISTED C	1			012

P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27619

MORIORANIE TO RIOLER NO. HAR HAMBER MARY APPENDING ALL

ACCOUNT

VENDOR WGEP - TV 2005 Francis St. Migh Point, N.C. 27261

SHIP TO

Attention: Charlie Davis

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

PENDENCE

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

ETHERMS CONTRACTOR	DAYE MOUNTO	JOS NUMBER	X-X)	1911	ICA REGUIRED		ACCOUNT
7-16-84				ğ	No	NO OF SAMPLES	
	7-16-84	PLEASE	SUPPLY ITEMS LISTED SOLOW			CHIT PRICE	TOTAL
	To pur Counit AFR-1 Ads to	*Defending I run Mon. Ju 7-9a 11:30-12M	Reagan* :30 aly 23 - Fri. Ju Good Morning Nightline News XXXXIII	ly 27, Americ	1984 :a	5 6 75. 5 6 100. 2 6 425. 2 6 225.	500.00
			: - HPS/AFR - TV				

P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27619

THE NUMBER WHAT APPEAR ON ALL

PURCHASE ORDER

INVOICES, PACKAGES AND CORRE

3045

VENDOR WRAL - TV 2619 Western Blvd. Raleigh, N.C. 28605

TO

SHIP

Quinn Koonts Attention:

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

SPONDENCE.

NO.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

PURCHASE ORDER DAY	DAYE NEGUINED	JOB NUMBER	IAI	PAG	IF REQUIRED		ACCOUNT
7-16-84	7-16-84			ž Š	8	NO OF SAMPLES	HP4
7-16-84	Figure	The second	and direct plan Library		Mark 1997	LINIT PRICE	Sevier 45
	To pur Counit	tee. *Defending	g Reagan" :30 July 23 - Fri Good Norr		1984 a	5 @ 225.	1125.00 168,75 \$ 956.25
			ley - HPS/AFR RECEIPT & AFFI				

P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER

3045

VENDOR

410 S. Salisbury St. Raleigh, N.C. 27601

SHIP TO

Attention: Bob Buselli

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

7-16-84	7- 6-84	A COMMANDA		ž	NO NE COURTED	NO. OF SAMPLES	HPS
	To pur Commi	rchase tele ttee. "Defending	evision time for g Reagan° :30 July 23 - Pri. Today8how	Helms f	or Sen	UNIT PRICE IS	75.00
				less	154		\$63.75
			ley - HFS/APR - RECEIPT & AFFIDA				

JEP , INC.

NO. 11111 HES HUMBER LUBY AND CONTRACT SHOULD SHOULD MEDICAL MEDICAL MEDICAL MEDICAL SHOULD SHOULD MEDICAL SHOU

3045

VENDOR

SHIP

WTVD - TV 411 Liberty St. Durham, N.C. 27710

Attention: Chuck Martin

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

7-16-84	7-13-84	ASSEMBLIA BOX OSA	(.)	PROOF REGUL	NO OF SAMPLES REQUIRED	HPS
		Construction of the PLAN	E SUPPLY FIRMS LISTED SELOW:	2.35	A UNIT MICE	TOTAL
	AFI	purchase televimittee. R-1 "Defending to run Mon. 3	Reagan" :30 July 23 - Fri.	July 27, 19	84	
	M,	7-9a Tu 12-12:30p ,W,F 6-7p ,F 11-11:30p	News	Henrs	2 Q 240.	250.00 480.00 1950.00 1300.00
				gross		\$3980.00
				less 15	•	59700
				netnet		\$3383.00
		vertising/Hawle				

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

FRO. BOX 19807 . RALEIGH, NORTH CAROLINA 27619



PURCHASE ORIGINA

HYOICES, PACKAGES AND CORPS

THE NUMBER MUST APPEAR ON ALL

3045

VENDOR WICT - TV 3221 Evans St.

Greenville, N.C. 27834

SHIP TO

Attention: Bob Peretik

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

SPONDENCE.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

EXIST FOR EACH	DATE RECLINED	JOS MUMBER	1.0.0		OF HEQUIRED		ACCOUNT
7-16-R4	7-16-84		ME SUPPLY ITEMS LISTED BELOW	Ĭ	20	NO. OF SAMPLES REQUIRED	HPS:
	Service Servic	PANEST COM	HE STANTA LLANG FIELD BETON	The second	200 - 1265	LOUP PROCES	
	Ads to	Committee	AFR-1 "Defer July 23 - Fri. J CBS Morning Evening News Late News	ding Re July 27, News	agan" 1984	5 @ 40. 2 @ 250. 2 @ 160.	
				net			\$ 867.00
			on/fl - HFS/AFR BCEIPT & AFPIDAY				

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER

NO.

3045

VENDOR WITH - TV

Highway 17 South Washington, N.C. 27889

Attention: Frank Brady

CLIENT (BILL TO)

TOWN AND ASSESSMENT AND ADDRESS

Jefferson Marketing, Inc.

SHIP

TO

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

PURCHASE ORDER DATE	QATE MIGUINED	PERMITS FOR	2.0.1	PROOF	M DUINED	NO. OF SAMPLES	ACCOUNT
7-16-84	7-16-84			1	ő	REQUIRED	HPG
SHOWING STA	PAGE 1	PLEAS	BLOOLY ITEMS LISTED BEING	en allegan and the		UNIT PRICE	TOTAL
	Senate	Committee. AFR-1 "Def	ending Reagan* ly 23 - Pri. Jul Today Show Evening Hews Late News			5 @ 30. 2 @ 140. 2 @ 65.	280.00
			/fl - HFS/AFR - BIPT & APPIDAVIT				

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

PROPERTY SERVICE

NO.

THE RUMBER MUST APPEAR ON ALL

A PACKAGES AND CORRE-

3045

VENDOR

WCTI - TV Part Ave

SHIP TO

Glen Burnie Gardens New Bern, N.C. 28560 Attention: Archie Russell

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

	DATE REQUIRED	JOB NUMBER	1.0.1	Y E	N O	NO. OF SAMPLES	ACCOUNT
7-16-84	7-16-84	The same of the same	E SUPPLY ITEMS LISTED SELOW.	The second secon	C2. C2 100 100	REQUIRED	TOTAL
	Ads to	chase 130 to Committee. AFR - 1°De run Mon. Je 7-9a 11:30-12:3	elevision time of ending Reagan's aly 23 - Fri. Jun Good Morning Reagan's Rightline	for Helm aly 27, g America geog	1984 can	5 @ 35. 5 @ 40. 2 @ 175. 2 @ 100.	178.00 200.00 350.00
			o/fl - HFS/AFR ·				

P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27819

PURCHASE ORIOTER

NO.

SPONDENCE.

THE HUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRE-

3045

VENDOR

WECT - TV 322 Shipyard Blvd Wilmington, M.C. 28403 SHIP TO

Attention: Enn Roberts

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

MERCH BETTER BETTER	BOW PAL	MOUNT	ADD NAMED A	FOA	PHOOF REQUIRED	NO. OF SAMPLES	ACCOUNT
-16-84	7-16				ž o	REQUIRED	HPS
		To pur Senate	robase telev Committee.	ision ads for He AFR-1 "Defend uly 23 - Fri. Ju	lms for		
		H-F Th,F Th,F	7-9a 6-7p 11-11:30p	Today Show Evening News Late News	,	5 @ 45. 2 @ 250. 2 @ 125.	
					gross		975.00
					less 15%		146.25
			*		net		\$828.75
			¥:				
		Advert	tising/Dawso	n - HPS/AFR - TV	Purchase		
		CRECK	ATTACHED: RE	CRIPT & AFFIDAVI	T REQUESTED		
						And the	

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27619

MONTH STEROLET

VOICES, PACKAGES AND CORRE-

ACCOUNT

VENDOR

SHIP

WMAY - TV 615 N. Front St. Wilmington, N.C. 28401 TO

Attention: Ty Watts

EVENEZA E CARA A DAM O MARIO ANO CARA CONTRA DE CONTRA D

CLIENT (BILL TO)

Jefferson Marketing, Inc.

WILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER. BILL DIRECT TO THE CLIENT BY ACCEPTING AND FULFILLING THIS

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

7-16-6	4	7-16-84			1		NO. OF SAMPLES	HPS
SAWLOR	S. S	ST THE WAY	Ent Works A Princes	LIPPLY. FTENIS LISTED BELOW A		, <u>)</u>	WINT PRICE	TOTAL .
		AFR-1	"Defending B run Mon. Ju	aly 23 - Pri. Jul	Ly 27, 1		5 @ 30.	150.00
		M-F	6-7p	Good Morning / Niteline Evening News Late News	gross		5 0 30. 6 0 125. 2 0 90.	150.00 250.00
					less 1	58	i.	110.00
			-21		net			\$ 620.00
				- HFS/AFR - TV				
		<u> </u>						

WLOSTV [3

P.O. BOX 2150 • ASHEVILLE, N.C. 28802

JEFFERSON MARKETING 3625 BARRETT DRIVE PILLING RALEIGH, N.C. 27619

MAKE 288 MACON AVE. PAYMENT ASHEVILLE, NC. 28804

CHAR	REPRESENTATIVE	LANE/CHAR SALESMAN	
JESSE	HECHS/ SEN.	POLITICALPRODUCT	

ORDER TYPE AGENCY EST. NO.

SINVOICE NO.

SINVOICE NO.

P. GE BROADCAST WONTH

O7/13/84-07/26/84

BILLING INSTRUCTIONS

	AR CAMEL AND				121-1			1333	n de delle de	Markey A San
			7/25	W 75	A 30		HFS-850-A 10596	10000		
			7/26	TH 72	A 30		HFS-850-A 10596	10000		
LINE# 2	2	- 1 ,	7/26	TH 75	2A 30		HFS-850-A 10596	1 0 0 0 0	1	
A LINE# :	1200N- 200P	15000	1 7/21	SA 12	1P 30		AFR-1R	15000	77093	
LINE#	400P- 800P	15000	7/22	SU 55	30		AFR-1 11292	15000	12623	
							PAID			
	COST PER ONFIRMATION	230000	1) .		STUAL GROSS BIL	LING	230000	SUB-TOTALS	
WE WARRAN	T THAT THE ACTUAL		1	en	10	MON COMISSIO	ON	34500	TOTAL RECONCILING	
	FROM THE PROGRAM		. 1	ly Conne	1 5	NET DUE	a	195500		395

WLOS-TV 13

P.O. BOX 2150 • ASHEVILLE, N.C. 28802

JEFFERSON MARKETING 3825 BARRETT DRIVE RALEIGH, N.C. 27619 PILLING AUDRESS

MAKE PAYMENT ASHEVILLE, NC. 28804

288 MACON AVE.

LANE/CHAR SALESMAN REPRESENTATIVE CHAR POLITICALPRODUCT JESSE HELMS SEN.

DATE 07/29/84 WLOS ORDER TYPE 588-885 48 CONTRACT YEAR 07/13/84-07/26/84 BILLING INSTRUCTIONS

The state of the s	and a mark of section on the	الله (م) (م) (م) المراجع المر	The state of the s	e i sili kasi		د وفورسا بعد رويد الأبية د وفورسا بعد الرويد الأبية
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700A- 900A 1	0000 7/13	F 719A 30	HFS-811 11374	10000		
	7/13	F 853A 30	HFS-811	10000		1 :
	7/20	F 721A 30	11374 AFR-1		From Exament	1
LINEO 1	4 7/20	F 811A 30	AFR-1	10000	2 36 263	1 1
1-TH 700A- 900A 1	0000 7/16	M 745A 30	HFS-850-A 10596	10000		1 1
	7/16	M 811A 30	HFS-850-A 10596	10000		1 1
	7/17	T 719A 30	HFS-850-A	10000		1
	7/17	T 844A 30	10596 HFS-850-A	10000	1	
	7/18	W 818A 30	10596 HFS-850-A	10000		
	7/18	W 649A 30	10596 HFS-850-A	10000		
	7/19	TH 711A 30	10596 HFS-850-A	10000		1
	7/19	TH 819A 30	10596 HFS-850-A	10000		1
	7/23	M 809A 30	10596 HFS-850-A	10000		1 ;
	7/23	M 858A 30	10596 HFS-850-A	10000		
	7/24	T 811A 30	10596 HFS-850-A	10000		1
	7/24	T 846A 80	10596 HFS-850-A	10000		1
	!		10596			1 :
	7/25	W 710A 30	HFS-850-A 10596	10000		1 1
			5119			
MONTHLY COST PER ORDER CONFIRMATION		ACTUAL GRO	988 BILLING		SUB-TOTALS	
WE WARRANT THAT THE ACTUAL BRO	43134-079	AGENCY COM	MISSION		TOTAL RECONCILING	
INFORMATION SHOWN ON THIS INVO WAS TAKEN FROM THE PROGRAM LOG		NET DUE			he HLAH 511	39

48840308058

WLOS-TV 13

P.O. BOX 2150 • ASHEVILLE, N.C. 28802

JEFFERSON MARKETING 3825 BARRETT DRIVE RALEIGH, N.C. 27619

AUDRESS

288 MACON AVE.

PAYMENT ASHEVILLE, NC. 28804

TO

CHAR REPRESENTATIVE	LANE/CHAR SALESMAN
JESSE HELMS/ SEN. 413	POLITICALPRODUCT

DATE 07/29/84 WLOS ORDER TYPE 588-882 WB 07/18/84-08/10/84 CONTRACT YEAR BILLING INSTRUCTIONS

												KŽ			
				7/26	тн	234P	30				HFS-850-A	15000		!	
LINE# 5	THE STATE OF		10	7/27	F	332P	30	}			10596 HFS-850-A 10596	15000	4		
	1230P- 100P	3000	1	7/22	QII.						10396	N/C	PGM RESCHEDULED		30
LINE# 6	12301 1001			// 22	30	40							PON RESCHEDULED	11	30
LINE# 8	1200M-1230A	3000	1	7/17	Т	1231A	30				HFS-850-A 10596	3000	SPEC PROGRAMMIN		
LINE 10	700P- 730P	35000	1	7/19	TH	705P	30				HFS-850-A 10596	35000	1000		
LINEQ 12			1	7/22	SU	318P	30		(07/22	AFR-1 11292	3000	TINE 1230- 100P	3000	
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La L	1						j	,							
MONTHLY C	OST PER FIRMATION	271000		1			7	CTUA	y GRO	S BIL	ING	271000	SUB-TOTALS	3000	3:
VARRANT	BROADCAS	ST .	ORGENCY COMMISSION 406							40650	TOTAL RECONCIL	NCILING			
	SHOWN ON THIS !	F	Commission Expires February 21, 1988.												

WLOS-TV [3

P.O. BOX 2150 • ASHEVILLE, N.C. 28802

JEFFERSON MARKETING A.A. THEY 3825 BARRETT DRIVE PILLING RALEIGH, N.C. 27619 AUDRESS

TO

288 MACON AVE.

PAYMENT ASHEVILLE, NC. 28804

CHAR REPRESENTATIVE	LANE/CHAR SALESMAN
JESSE HELMS/ SEN. 413	POLITICALPRODUCT

DATE 07/29 84 WLOS ORDER TYPE 588-88548 07/18/84-08/10/84 CONTRACT YEAR BILLING INSTRUCTIONS

And and	1					And the State	
I,W,F	700A - 900A	10000	7/16 M 720A 30 7/18 W 721A 30	HFS-850-A 10596 HFS-850-A	10000		
LINE#	1	3	7/20 F 849A 30	10596 AFR-1	10000	250	
1-F	700A- 900A	10000	7/23 M 709A 30	HFS-850-A 10596	10000		
•			7/24 T 711A 30	HFS-850-A 10596	10000		
			7/25 W 818A 30	HFS-850-A	10000		
			7/26 TH 845A 30	HFS-850-A 10596	10000		
LINE	3	5	7/27 F 810A 30	HFS-850-A 10596	10000		
1-F	1228P- 400P	15000	7/16 H 1229P 30	HFS-850-A 10596	15000		
			7/17 T 1228P 30	HFS-850-A 10596	15000		
			7/18 W 1229P 30	HFS-850-A 10596	15000		
			7/19 TH 259P 30	HFS-850-A 10596	15000	A sound	
			7/20 F 136P 30	HFS-850-A 10596		- Minsid	
			7/23 M 158P 30 7/24 T 1228P 30	HFS-850-A 10596 HFS-850-A	15000 1 15000		
			7/25 W 259P 30	10596 HFS-850-A 10596	15000		
	COST PER ONFIRMATION		ACTU	AL GROSS BILLING		SUB-TOTALS	
	T THAT THE ACTUAL		AGEN	CY COMMISSION		TOTAL RECONCILING	1
	FROM THE PROGRAM		NET	DUE		te HIAH 553	396

WLOSTV 13

P.O. BOX 2150 • ASHEVILLE, N.C. 28802

MLLING AUDRESS

JEFFERSON MARKETING 3825 BARRETT DRIVE RALEIGH, N.C. 27619

TO

288 MACON AVE. PAYMENT ASHEVILLE, NC. 28804

CHAR	REPRESENTATIVE	LANE/CHAR SALESMAN	
JESSE	HELMS/ SEN. 413	REP. FOR SENATET	

DATE 07/29/84 WLOS ORDER TYPE 588-885 MA CONTRACT YEAR BILLING INSTRUCTIONS

				MANAGE AND	4-11-11-11-11-11-11-11-11-11-11-11-11-11	THE SE	nestalia isti	Ukg Kalendaria
		7/26 1	TH 1107P	30	AFR-1	22500	>304	
LINE# 5	5	7/27	F 1117P	30	11292 AFR-1 11292	22500	> 20,	
-F 700A- 900A	10000	7/24	T 742A	30	AFR-1 11292	10000		
		7/25	W 844A	30	AFR-1 11292	10000	130+5	
		7/26 1	TH 817A	30	AFR-1	10000	1.30	
LINE# 6		7/27	F 712A	30	11292 AFR-1 11292	10000		
					PAID			
MONTHLY COST PER	375d00		<u>, i </u>	ACTUAL GRO	SS BILLING	375d00		
WE WARRANT THAT THE ACTUAL		11	• • •			56250	SUB-TOTALS	
INFORMATION SHOWN ON THIS I WAS TAKEN FROM THE PROGRAM	INVOICE	the state of the s	- D	NET DUE		318750	TOTAL RECONCILING ITEMS HAN 342	393

WLOSTV [3

P.O. BOX 2150 • ASHEVILLE, N.C. 28802

JEFFERSON MARKETING 3825 BARRETT DRIVE NILLING RALEIGH, N.C. 27619

MAKE 288 MACON AVE. PAYMENT ASHEVILLE, NC. 28804 TO

CHAR	LANE/CHAR SALESMAN	
JESSE HELMS/ SEN.	REP. FOR SENATE	

ORDER TYPE AGENCY EST. NC. 323/974

S86-003944 P. GE BROADCAST MONTH JULY, 1984

O7/23/84-07/27/84 CONTRACT YEAR

BILLING INSTRUCTIONS

4.	A CONTRACTOR OF THE PARTY OF TH	والم المراجع المراجع	به مستور	-	Control of the Control	ار مرد در درو سطونها مرد در درو سطونها		AND THE RESERVE	List of the second second	
	700A- 900A	10000	7/23	М	744A	30	AFR-1	10000		
			7/23	н	845A	30	11292 AFR-1	10d00		
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	1200M-1230A	3000	7/23	M	1228A	30	AFR-1 11292	3000		
			7/24	T	1222A	30	AFR-1 11292	3000	l/	
			7/25	W	1207A	30	AFR-1	3000	1010	
			7/26	тн	1209A	30	11292 AFR-1	3000		
				F	1215A	30	11292 AFR-1	3000		
LINE# 3							11292			
	558P- 630P	37500	7/23	H	605P	30	AFR-1 11292	37500		
			7/24	T	627P	30	AFR-1 11292	37500	1000	
			7/25	W	614P	30	AFR-1 11292	37500		
			7/26	ТН	606P	30	AFR-1 11292	37500		
LINE# 4			7/27	F	627P	30	AFR-1 11292	37500		
	1101P-1130P	22500		M	1139P	30	AFR-1	22400	B/BALL RUNGVER	
		1	7/24		1127P		11292 AFR-1	22500		
			7/25			157 0	11292	22500	4.19	
			//25		1110P		AFR-1 11292	22300		
MONTHLY CO	COST PER NFIRMATION					ACTU	AL GROSS BILLING		SUB-TOTALS	
	THAT THE ACTUAL N SHOWN ON THIS					AGEN	CY COMMISSION		TOTAL RECONCILING	
	FROM THE PROGRAM			7		NET	DUE		LE HIAN 342	

JEFFERS	ON MARKE	TING		φ	1	P. O. BOX	X 1717			6	827-3	INVOICE	ORDER TYPE		AGENCY EST	
P 0 BOX		2761	yll 9			JOHN BL	RTISER	• co.		PRODUC	NATL	407	SCHEDULE DA		CONTRACT	
						HELMS/R	EP/N	C SEN	APD H	IELMS S	SENATE C		NDARD BR	DADCAST	GNTH	
	CHEDULE									ADCAST					NCILIATION	Τ.
7 TIME	PATE DETAIL	RATE	NO THIS MONETH	DATES	DAY	TIME	TYPE	10 CLASS	11 P/8	M/G FOR	PRODUCT/FIL	M NO	14 RATE	15 REMARKS	DR	1
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						02:28P	30	- P1			HF\$-850	5.5500	250 250			1
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1		1111111	-						-	200						+
									A. Friday						TO THE REAL PROPERTY.	
							22									
			-									20000	Samuel - N			+
HLY COST INFRMATION		250.	00		-	ACTUAL GR	OSS BILLI	NG			/		1250.00	SUB-TOTALS		
VARRANT THAT						AGENCY CO	OMMISSIC	ж					187.50	TOTAL RECONCIL	ING	
IS INVOICE WA	S TAKEN FROM					NET DUE							1062.50			

JEFFERSON MARKETING

P 0 BOX 19807 RALEIGH, NC

27619



P. O. BOX 1717 SPARTANBURG, S. C. 29304

JOHN BLAIR + CO. POLITICAL NATL

ADVERTISER PRODUCT

HELMS/REP/NC SENAPD HELMS SENATE COM

ORDER TYPE

ORDER TYPE

ORDER TYPE

AGENCY EST NO

INVOICE NO

PAGE

BROADCAST MONTH

JULY

SCREDULE DAYES

CONTRACT YEAR

07/18/84-076/232-484 UCTIONS

M

STANDARD BROADCAST MONTH

	SC	HEDULE			1				ACTU	AL BRO	ADCAST			RECONCILIATION		
	2 TIME	RATE DETAIL	4 RATE	5 NO THIS MONTH	6 DATES	7 DAY	8 TIME	9 TYPE	10 CLASS	11 P/B	12 M/G FOR	PRODUCT/FILM NO	14 RATE	15 REMARKS	16 DR	17 CR
	658-89	Pl	600	1	07/2	SA	07:13P	30	Pl			AFA-1	600	1895	+	
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														Anna de Parinta		
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	LY COST FIRMATION		600.	00			ACTUAL GI	ROSS BILLI	NG				600.00	SUB-TOTALS		
DC	AST INFORM	THE ACTUAL					AGENCY C	OMMISSIC	ON				90.00	TOTAL RECONCILIN	G	
	GRAM LOG	S TAKEN FROM					NET DUE						510-00			

NVOICE AFFIDAVIT
ENCY: JEFFERSON MARKETING
POOD BOX 19807
RALEIGHO NOCO

27619

EMIT: WYFF-TV
P.O. BOX 788
GREENVILE, SC
ATTN: ACCOUNTING DEPT.

AFR 7,27

	· .4, 44 ·
REPRESENTATIVE	SALESMAN
PETRY OFFICES	POLITICAL/NATIONAL
ADVERTISER	PRODUCT
AMERICANS END DEACAN	IDS ANED EDD DEACAN

ORDER TYPE AGENCY ESTIMATE NO

REVISION-03
INVOICE NUMBER BROADCAST MONTH

INV# 7121-01 6/25-07/29/84
SCHEDULE DATES BILLING PERIOD

			_		-	2960	12	WE WARR		HAT THE A	CTUA					OWN 1	. I WAS TE			
	T		11-		SC	HEDULE				D. DATES DAY TIME TIPE M.G FOR PRODUCT FILM								RECONCILIATI		A 100
W	T	1 5	SAS	U		TIME		RATE	NO.	DATES	DAY	TIME	MIN	215	M.G FOR	PRODUCTFILM	RATE	DEBIT	CREDIT	REMARK
				-				THE NAT					AL I	LUE						
X	×	X		M		7-9A		120.00		7/23				30		AFR-1-R PBHFSCM	120.00	\		
		1								7/23	MO	B14A		30		AFR-1-R PBHFSCM	120.00			
	1	1								7/24				30		AFR-1-R	120.00	30.45		
		1		İ						7/25	WE	723A		30		AFR-1-R PBHFSCM	120-00	730		
	1	1								1/26				30		AFR-1-R PBHFSCM	120.00			
										7/27	FR	720A		30		AFR-1-R PBHFSCM	120.00			
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		1														Harrie I				
	J C	HED	ULE	COS	TF	OR THIS E	ILLING	PERIOD		ACTUAL	GROS	S BILLING	AGE	NCY	COMMISS	ION NET	DUE	SUB-T	OTALS	RECONCILIA
				17-				720.00		7 6	7	-				TERMS: NE				DK

INVOICE AFFIDAVIT GENCY: JEFFERSON MARKETING P.O. SOX 19807 RALFIGH, N.C.

27619

29602

REMIT: WYFF-TV P.C. BOX 798 GREENVILE. SC

ATTN: ACCOUNTING DEPT. AMERICANS FOR REAGAN

WYFF-TV 07/31/84 PAGE: 2 ORDER TYPE AGENCY ESTIMATE NO REVISION-01 INVOICE NUMBER BROADCAST MONTH 6/25-07/29/84 INV# 7206-01

BILLING PERIOD

REPRESENTATIVE SALESMAN PETRY OFFICES POLITICAL/NATIONAL ADVERTISER PRODUCT

(R) AMERICAN 4 REAGAN

7/20-07/22/84 STANDARD WE WARRANT THAT THE ACTUAL BROAD JAST INCOMES. IN SHOW, IN THE PROPERTY OF MAS TAKEN FROM THE PROPERTY OF

SCHEDULE DATES

SCHEDULE ACTUAL BROADCAST RECONCILIATION MIN I SEC MIG FOR PRODUCT FILM TU W TH F SA SU TIME RATE NO. DATES DAY TIME RATE CREDIT DEBIT REMARKS 900.00 12623 900PM-1130PM 900.00 7/22 SU 928P 30 AFR-1-1R PD3Y NCC AP S Breakdown SCHEDULE COST FOR THIS BILLING PERIOD ACTUAL GROSS BILLING AGENCY COMMISSION SUB-TOTALS NET DUE . RECONCILIATION

2.940.00

5 8.90 400 5 0441.00 TERMS: WET 30 DAYS

INVOICE AFFIDAVIT

GENCY: JEFFERSON MARKETING

P.O. 30x 19807 RALEIGH. N.C.

27619

REMIT: WYFF-TV

P.G. DOX 788 GREENVILE. SC

REPRESENTATIVE SALESMAN POLITICAL/NATIONAL

07/31/84 PAGE: . WYFF-TV ORDER TYPE AGENCY ESTIMATE NO REVISION-01 INVOICE NUMBER BROADCAST MONTH

PETRY OFFICES INV# 7206-01 6/25-07/29/84 ADVERTISER PRODUCT SCHEDULE DATES BILLING PERIOD 7/20-07/22/84 ATTY: ACCOUNTING DEPT. AMERICANS FOR REAGAN (R) AMERICAN 4 REAGAN STANDARD

WYFF-TV

		SCHEDULE			-				BROADCAST			RECONCILIATION		
WTHF	SASU	TIME	RATE	NO.	DATES	DAY	TIME	MIN	SEC MIG FO	R PRODUCT FILM	RATE	DEBIT	CREDIT	REMARK
		PAID FOR	ELMS FOR	SE	NATE C			NAL	CLUB					
	x	RETIMED 1	150-00	1	7/22	su	155P		30	AFR-1-R PDBY NCC	150-00	v 1895		
	x	BASERALL	350.00	1	7/21	SA	407P		30	AFR-1R	350-00	v 2623		
		REP	FOR SPUR	TSM	ORLD N	A S	AME DA	TE	PGM					
	×	200PH-0530PM	225.00	1	7/22	SU	521P		30	AFR-1-IR PD3Y NCC	225.00	1895		
_ x		M-F 1230-330P	260.00	2					30	AFR-1 PUBNCC	260.00			
					7/20		258P		30	AFR-1 POBNCC	260.00	/ 2901		
x		M-F 9-10A	185.00	1	7/20	FR	949A		30	AFR-1 PD3HFSCM	185.00	v 2905		
x		M-F 7-9A	120.00	1	7/20	FR	848A	1	30	AFR-1 POBNCC	120.00	v 2623		
x		MF 1130-1230A	140.00	1	7/20	FR	1205A		30	AFR-1 PD3NCC	140.00	v 2623		
	x	BASEBALL	350.00	1	7/21	SA	548P		30	AFR-1-	350-00	, 1895		
SCHED	DULE CO	OST FOR THIS SILLING	G PERIOD		ACTUAL	GROS	S BILLING	AGE	NCY COMMIS	SION NET	DUE	SUB-	TOTALS	RECONCIU
					9 6	C	Þ 0	-	0 2 0	CV			Contract of	OÉ.

GENCY: JEFFERSON MARKETING
P.D. BUX 19807
RALEIGH N.C.

27619

29602

PETRY OFFICES

P.G. BOX 788

GREENVILE. SC

ATTN: ACCOUNTING DEPT. (R) JESSE HELMS

WYFF+TV

WYFF-TV 07/31/84 PAGE: 1

ORDER TYPE AGENCY ESTIMATE NO

REVISION-02
INVOICE NUMBER BROADCAST MONTH

INV# 7084-01 6/25-07/29/84
SCHEDULE DATES BILLING PERIOD

REPRESENTATIVE SALESMAN INVOICE NUMBER

PETRY OFFICES POLITICAL/NATIONAL INV# 7084-01
ADVERTISER PRODUCT SCHEDULE DATES

(R) JESSE HELMS (R) JESSE HELMS/NC SEN 7/13-07/21/84

WE WARRANT THAT THE ACTUAL BROAD AST INVARIANT TO SHOW OF THE PROPERTY OF THE

			SCHEDULE								DADCAST			RE	CONCILIAT	ION
TUW	TH F	SAS	U TIME	RATE	NO.	DATES	DAY	TIME	WIN	SEC	M/G FOR	PRODUCT FILM	RATE	DEBIT	CREDIT	REMARK
10 F	OR t	Y Н	ELMS FOR SENATE MF 1130-1230A	COMMITTE 140.00	E;			ENS. 1		SUR 30		HFS-811 POSHFSCM	140.00			
			1130PM-0100AM	RETIME 140.00		7/16				ATL 30	CUNVE	NTION HFS-850A	140-00	T		
Î			1130V H- U100AH	14000				1224A		30		PDBHFSCM HFS 350A	140.00			
								1213A			1	PDBHFSCM HFS850A	140.00			
						7/18						PDAHESCM	11000		140-00	SCH CH
						7/21		239P		30	7/18	AFR-1-R	140.00	140-00	Extra	
	×		M-F 7-9A	120-00	1	7/13	FR	747A		30	1	HFS-811 POBHFSCM	120-00	7. T		
××	x		M-F 7-9A	120.00	4	7/16	MO	810A		30		HFS-850A PDBHFSCM	120.00			
				0.00	1	7/17	TU	848A	7,7	30		HFS850A PD8HFSCM	120-00			
						7/18	WE	720A		30		HFS850A PDBHFSCM	120.00			
						7/19	TH	849A		30		HFS850A PD8HFSCM	120-00			1-11-
		x	130PH-0430PM	350.00	1	7/14	SA	223P		30	1	HFS-811 PDSHFSCM	350.00			
8	CHED	DULE	COST FOR THIS BILLIN	G PERIOD		ACTUA	L GROS	S DILLING	AGE	NCY	COMMISS	ION NET	DUE	SUB-	TOTALS	#ECONCILIAT

REMIT: WHNS-TV 21 INTERSTATE COURT AT PELHAM ROAD GREENVILLE. SC

RALEIGH NC

29607 GENCY: JEFFERSON MARKETING P O BOX 19807

ASHEVILLE-GREENVILLE-SPARTANBURG

HELMS FOR SENATE

INTERSTATE COURT AT PELHAM RD., GREENVILLE, S.C. 29607 (803) 288-2100

HELMS FUR SENATE

SALESMAN REPRESENTATIVE TURNER, MARK KATZ CHARLOTTE PRODUCT ADVERTISER

AGENCY ESTIMATE NO. ORDER TYPE ORIGINAL CONTRACT NUMBER BROADCAST MONTH 6/25-07/29/84 INV# 1041-02 BILLING PERIOD SCHEDULE DATES STANDARD 7/22-07/22/84

THE THE P SUN 250.00 1 7/22 SU 452P 30 AFR-1 250.00 PARTS NO. 00 PARTS	,164				A YMENO DE I	·				AC	TUAL	BROADCAST				CONCILIAT	ION
x 4-6P SUN 250.00 1 7/22 SU 452P 30 AFR-1 250.00 1 9 9 4	त स स	7 2	450			RATE	NO.	DATES	DAY	TIME	MIR	SEC M/G FOR	PRODUCT/FILM	RATE	DEBIT	CREDIT	REMAR
			×	4-6P	SUN	250•00	1	1/22	su						1894		
											1						
											i						
Transport Control of the Control of																	
ACTUAL GROSS BILLING AGENCY COMMISSION PAY THIS AMOUNT	F-0-20	HEDL	JLE (COST.FC	OR THE BELLIN	S PERIOD:	3	ACTUAL	GROS	S BILLIN	AG	ENCY COMMISS	ON PAY THE	S AMOUNT	**************************************	TALS	RET

MOICE MUNICE AGENCY BILLING ADDRESS JEFFERSON PILOT BROADCASTING CUMPANY WBTV JEFFERSON MARKETING, INC. ONE JULIAN PRICE PLACE 10814301 CHANNEL 3 P- U-BOX 19807 --- 764/374-3731-RELEASE SELLA SELL RALEIGH NC 27619 JULY YES 的工作工作的工作,在一个工作,这个人的证明,我们就是一个人,我们们就是一个人,我们们就是一个人,他们们们的一个人,我们们就是一个人,我们们就是一个人,我们就是一 MAKE PAYMENT TO 7-20-84 POL US SENATE KETV LOCAL ONE JULIAN PRICE PLACE [2] A. E. D. HARLOTTI-NC 28208 JBM 3050 108143 109838 JESSE HELMS (R) SCHEDULE RECONCIDATION FACTUAL BROADCAST INVOIDE BILLING DATES: 07/16/84-07/20/84 7-16 7-20 1 1 1 5-7A 7-16 MU 65 30 605A WHES-850A 7-18 WE 30 65 614A VHFS-850A 2905 62 AFR=1 7-20 FR 30 62 8A 7-16 7-20 1 1 1 7-9A 125 7-16 MO 30 707A WHFS-850A 125 7-17 TU 30 718A HFS-850A 125 31 3 7-19 TH 759A MHFS-850A 125 7-16 7-20 1 1 1 1 4-5P 200 7-16 MG 30 416P HFS-850A 200 7-17 TU 30 35 9P HFS-850A 200 7-16 WE 30 439P HFS-85UA 200 7-17 TH 30 41 OP MHFS-85UA 200 7-16 7-20 1 1 5-6P 275 7-17 TU 30 501P MFS-850A 275 30 524P 275 7-19 TH HFS-850A 7-16 7-20 1 1 1 1 1 1130-1230P 725 7-16 MO 30 1138A HFS-350A 225 3C 12244 225 7-17 TU HFS-650A 30 JHFS-350A 225 7-18 WE 1154A 225. 7-15 TH 3C 1205P HFS-850A 2905 30 1139A JAFK-1 5 J 7-20 FR 275 7-16 7-20 2 1 1 1 2 7-16 MD 113UA-4P 275 30 1219P HFS-850A 275 3. 259P 7-16 MC HES-850A 7-17 TU 31 HTS-850A 2751 1145A 275 7-13 hi 3) 1213 HFS-350A 275 HFS-850A 7-10 TH 30 128P 2905 275 30 1220P VAFR-1 7-20 FR CONTINUED NEXT PAGE MONTHLY COST CONFIRMATION SUB-TOTAL ACTUAL GROSS BILLING We warrant that the actual broadcast information shown on this invoice was taken from the program log TOTAL RECONCILING ITEMS AGENCY COMMISSION NET DUE AMOUNT ORIGINAL COPY 1

WETV JEFFERSON PILOT BROADCASTING COMPANY FOR THE STATE OF THE PROPERTY 7-24-84 CHANNEL 3 10814301 GNE JULIAN PRICE PLACE 704/374-3731 P. C. BOX 19807 CHARLETTE, NORTH CAROLINA 28208 RATE CARD THE ROAD CAST MONTH LAND AGENCY RALFIGH NC 27619 JULY YES TREPRESENTATIVE TO THE STATE OF THE PROJECT OF THE MAKE PAYMENT TO POL US SENATE 7-20-84 -VTSW-LOCAL UNE JULIAN PRICE PLACE CONTRACTANCE OF THE CONTRA CHARLE COUNTRIES NUMBER CHARLOTTE NC 28208 JESSE HELMS (R) JBM 3050 108143 109838 ACTUAL BROADCAST RECONCILIATION SCHEDULE TO A SERVICE AND A SERVICE AND ASSOCIATION OF A CONTROL OF A CONTROL OF A CONTROL OF A CONTROL OF A CONTROL OF REMARKS LITTORY OF A DESCRIPTION 7-20 FR 30 258P /AFR-1 275 MONTHLY COST CONFIRMATION 4.970.00 SUB-TOTAL 4.970.00 ACTUAL GROSS BILLING to warrant that the actual broadcast information shown on this involce was taken from the program log. 745.50 TOTAL RECONCILING ITEMS AGENCY COMMISSION ORIC MALCORY 1 4 . 224 . 50 NET DUE AMOUNT

INVOICE HUMBE THE INTEREST STATE PAGE AGENCY BILLING ADDRESS WHIT JEFFERSON PILOT BROADCASTING COMPANY JEFFEPSON MARKETING, INC. 108190C1 ONE JULIAN PRICE PLACE CHANNEL 3 7-24-84 CHARLCTTE. NORTH CAROLINA 28208 704/374-3731 P. C. BOX 19807 PLATE CANDISTATE BROADCAST MONTH STATE AGENCY! PALEIGH NC 27619 JULY 32 YES REPRESENTATIVE SOLD STATE OF THE PROPERTY OF T MAKE PAYMENT TO POL POLITICAL WETV LUCAL 7-22-84 UNE JULIAN PRICE PLACE CONTRACT NUM PLANTA MANAGEMENT NOMBERTS CONTROL DESIGNATION OF THE POST OF THE POS CHARLOTTE 28208 NC AMERICANS FOR REAGAN 3050 108190 109838 RECONCIDIATION ACTUAL BROADCAST PATOLOGIC CONTROLLEGIO REGISTRA CARRANTE REGISTRA PROPERTIES CONTROLLEGIO CONTROLLEGIO PER CONTROLLEGIO PER CO INVOICE BILLING DATES: 07/20/84-07/22/84 7-20 7-20 800 1 7-20 FR 30 1130P AFR-1 300 1 N ADJ 10 1131P 800 1 | 7-21 | SA AFR-1R 800 LN ADJ 7-21 7-21 90 1059P 700 1 7-22 SU AFR-IR 700 7-22 1 LN ADJ 7-22 7-21 SA 30 628P 700 1 AFR-1R 7004 EN ADJ 7-21 7-21 225 1 7-22 SU 30 953A AFR-18 8-1030A 225 7-22 7-22 MONTHLY COST CONFIRMATION 3 - 225 - 00 SUB-TOTAL 3.223.00 ACTUAL GROSS BILLING We warrant that the actual broadcast information shown on this invoice was taken from the program log. 483.75 TOTAL RECONCILING ITEMS AGENCY COMMISSION OR TIMAL COPY = 1 2.741.25 NET DUE AMOUNT

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MONTHLY COST CONFIRMATION

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We warrant that the actual broadcast information shown on this invoice was taken from the program log.

ACTUAL GROSS BILLING 3+425+00 SUB-TOTAL

AGENCY COMMISSION 513+75 TOTAL RECONCILING ITEMS

NET DUE AMOUNT 2+911+25

ORIGINAL COPY

CHARLOTTE, N.C. OTN: ACCOUNTING | 28232

JEFFERSON MARKETING P. O. BOX 18848 RALEIGH, N.C.

27619

5 0 3 WSOC-TV .0 4

1401 N 1010N ST CHARGITE NC NE (704)335 4999

REPRESENTATIVE	SALESPERSON
	PELLETIER, JERRY
ADVERTISER	PRODUCT
HELMS FOR SEN	HELMS FOR SENATE

(ORDER TYPE	AGENCY ESTMATENG
	ORIGINAL	
t	INVOICE NUMBER	SPOADGAST MONTH
	INV# 0901-03	6/25-07/29/84
t	SCHEDULE DATES	BILLING PERIOD
1	7/13-07/26/84	STANDARD

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P. O. POX 32849 CHARLOTTE, N.C. ATTN: ACCOUNTING 28232

RALEIGH, N.C.

JEFFERSON MARKETING P. O. BOX 18848

27619

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1901 N WYON ST. CHARLOTTE N.C. TEL 17041335-4999

A AMERICAN REPRESENTATIVE TO THE	SALESPERSON
	PELLETIER, JERRY
ADVERTISER	PRODUCT
HELMS FOR SEN	HELMS FOR SENATE/R

ORDER TYPE AGENCY ESTIMATE NO. ORIGINAL INVOICE NUMBER THE BROADCAST MONTH INV# 1149-04 6/25-07/29/84 BILLING PERIOD SCHEDULE DATES 7/16-08/12/84 STANDARD

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WSOC--TV

08/06/84

PAGE! 1

1901 N TRYON ST. CHARLOTTE. N.C. TEL (704)335-4999

PELLETIER, JERRY

PRODUCT

HELMS FOR SEN

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JEFFERSON MARKETING

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8 5 0 3 0 5 delour 4 0 7 WPCQ-TV P 0 BOX 75089 EMIT 28275 CHARLOTTE NC TO: NVOICE NUMBER 20-316566 Westinghouse Broadcasting and Cable, Inc. $\mathsf{HPCQ\!-\!TV}$ PAGE 9160 JEFFERSON MARKETING CHARLOTTE M. THUO: DATE . 07/22/84 TERMS DUE AUG. 15, 1984 P. O. BOX 19807 AGENCY EST. NO.: 27619 AGENCY CONTACT: RALEIGH NC SUSAN MILLER ITH: 20-1778-99 CONTRACT NUMBER: 07/19/84 BROADCAST 07/20/84 - 07/22/84 08096 CONTRACT DATE: DATES ... NAT'L REPUBLICAN CONGRSS.COMM. AMERICANS FOR R ACCOUNT FRANK MACK 310 1ST ST. S.E. OR: PRODUCT NAME: DC 20003 PRODUCT CODE: WPCQ-TV WASHINGTON 1302 OFFICE:

GASS GROUP	LENGTH	SCHEDULE DATES				SCHEDULE TIME	M/G FOR	ITEM ?	COMME				
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			TOTAL BROADS	ASI		SGROSS BILING		,070.00	DIRECT	INQUIRY	TO	TOTAL CREDITS	8450
WARRANT THAT THE	ABOVE	BROADCASTS/WERE				NON-COM. AMOUNT		.00	JOYCE	PETTIT		TOTAL DEBITS	8450
WARRANT THAT THE DE ACCORDING TO TIME APPROX.		cial station log. In 15 hinutes	PAY TH			AGENCY COMMISSION NET BILLING	1	160.50	704-53 CHARLO	6-3636		TOTAL ITEMS RECONCILING	

8 5 0 3 0 Schoul 4 0 8 INVOIGE MPCO-TY EMIT P. O BOX 75089 CHARLOTTE 20275 NC Westinghouse Broadcasting and Cable, Inc. 9160: HPCOSTY JEFFERSON MARKETING CHARLOTTE IN 07/29/04 TERMS DUE AVO. 190 1904 P. O. BOX 19807 OUNT AGENCY EST. NO. ITH: RALESCH AGENCY CONTACT: BUSAN MILLER CONTRACT NUMBER 30-1779-99 CONTRACT DATE: 07789764 07/23/64 -- 07/27/64 L. REPUBLICAN CONGRESSCONN MASHINGTON AMERICANS: FOR: R PRANK! MACK OR: PRODUCT NAME: 1305 MPCO-TV. PRODUCT CODE: elen-solvie. 3045 ok sm 225200 TOTAL CREDITS TOTAL BROADCAST GROSS BILLING **200** TOTAL DEBITS NON-COM. AMOUNT COMMISSIONABLE TOTAL TOTAL FREMS AGENCY COMMISSION RECONCIUNG PAY THIS CHARLOTTE NET BILLING

ORIGINAL INVOICE

8 5 0 3 WCCB4-18 TELEVISION One Television Place One Television Place

Charlotte, N.C. 28205

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DATE 7/29/84 1454-00074

FULTTICAL PAGE BROADCAST MONTH INVOICE NO. 40710563 1
SCHEDULE DATES JULY CONTRACT YEAR

BILLING INSTRUCTIONS

CONTRACT DROADCAST CALENDAK

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DESCRIPTION	PRICE	RATE	THIS PER	DATE	DAY	TIME	LENGTH	M/G FOR	PRODUCT DESCRIPTION	PRICE		REMARKS	DR	CR
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COST). Z						ACTUAL	. GROSS BILLING	780.00		TOTALS		
AST INFOR	MATION SHO	WN O	N					AGEN	ICY COMMISSION		ITEM	AL RECONCILING IS		.00

of sm.

TELEVISION

One Television Place Charlotte, N.C. 28205

111851 JEFFF4:50N NARKETING INC P.O. FOY 19807 PALETCH NC 27619

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REP. PATZ

SLSP: S MARK TURNER

ADV. PULITICAL

PROD: HELMS REF FOR SENGIL

DATE 7/25/64 1454-00078

PULITICAL

INVOICE NO. 40710205 SCHEDULE DATES

BROADCAST MONTH PAGE JULY CONTRACT YEAR

7/21/84- 7/22/84 TRUCTIONS

STANDARD ERDADCAST CALENDAR

SCH					RECO	RECONCILIATION							
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OD COST CONFIRMATION					4-4			ACTUAL	GROSS BILLING		SÚB-TOTALS		
	4	80.0	50					10000	. Onlogg Greento	300.00	TOTAL RECONCILING		
VARRANT TH								AGEN	ICY COMMISSION		TEMS	10	0.000

NET DUE

323.00

IS INVOICE WAS TAKEN FROM THE OGRAM LOG.

ok. SM

P.O. Ben TV-2 * Greenbere, Horth Caroline 27430 * (919) 379-9369 A Nove-Hoste Telephone

ACY/CLIENT

JEFFERSON MARKETING PO BOX 19807 ILLING UDRESS RALEIGH, N.C. 27619

WFMY TELEVISION CORP

MAKE P O BOX TV2 AYMENT GREENSBORD, N.C. 27420

REPRESENTATIVE	SALES, JEFF	
ADVERTISER HELMS FOR SENATE	PRODUCT (R)CAD F/US SENATE	

WFMY DATE 07/29/84 ORDER TYPE AGENCY EST. NC. 532 INVOICE NO. P. GE BROADCAST MONTH JULY, 1984 CONTRACT YEAR 403-048763 SCHEDULE DATES 07/20/84-07/26/84 BILLING INSTRUCTIONS

|--|--|

DUE 15TH OF MONTH FOLLOWING BROADCAST

8 5 0 3 0 5 0 4 4 1 2



. CY/CLIENT

JEFFERSON MARKETING PO BOX 19807 RALEIGH, N.C. 27619

MAKE P O BOX TV2
PAYMENT GREENSBORO, N.C. 27420

REPRESENTATIVE	SALESMAN SALES, JEFF	
ADVERTISER HELMS FOR SENATE 119	PRODUCT WM(R)CAD F/U.S. SEN	

ORDER TYPE 2 AGENCY EST. NC. 532
INVOICE NO. 403-048761 2 BROADCAST MONTH 403-048761 2 JULY, 1984
SCHEDULE DATES CONTRACT YEAR
07/16/84-08/12/84
BILLING INSTRUCTIONS

		7/17 1	1005A		HFS-850-A	1.035C		
		7/18	944A	30	HFS-850-A	8500 8500		!
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	1 ! !	7/24 1	959A	30	HFS-850-A	8500		1
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		7/20 F	1216P	30	AFR-1 HFS-850-A	13000	20,000	
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FORMATION SHOWN ON THIS KEN FROM THE PROGRAM LOG				NET DUE		385050		

DUE 15TH OF MONTH FOLLOWING BROADCAST

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wfmy-tv

P.O. Box TV-2 • Greenbern, Horth Caroline 27420 • (919) 379-9369

A Nove-House Totalisten S

JEFFERSON MARKETING
PO BOX 19807
ILLING RALEIGH, N.C. 27619
UDRESS

TO

MAKE P O BOX TV2
AYMENT GREENSBORD, N.C. 27420

REPRESENTATIVE SALESMAN
SALES, JEFF

ADVERTISER PRODUCT
HELMS FOR SENATE WM(R)CAD F/U.S. SEN

. CY/CLIENT

	WFMY	DATE 07/29/84
ORDER TYP	2	AGENCY EST. NC. 532
INVOICE NO. 403-048761	P. GE	BROADCAST MONTH JULY, 1984
SCHEDULE D/ 07/16/84-08/1		CONTRACT YEAR
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			7/18	W	721A			HFS-850-A	9000	
			7/19		734A	30		HFS-850-A	9000 9000 9000	2006
			7/20	F	726A	30 .		AFR-1	2000	D / X''
			7723	M	759A	30		HFS-850-A	9000	
			7/24	T	759A	30		HFS-850-A	9000	
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			7/26		732A			HFS-850-A	9000	
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	800A - 900A	4500	7/16		850A			HFS-850-A	4500 4500	
			7/17		856A			HFS-850-A	4500	
	1		7/18		846A			HFS-850-A	4500	
		1 1 1	7/19					HFS-850-A	4500	2.405
		1 1	7/20		BADA			AFR-1	4500	
			7723		847A			HFS-850-A	4500	
			7/24		835A			HFS-850-A	4500	
		1	7/25 7/26		840A 849A			HFS-850-A	4500	
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			7/22	SU	829A			AFR-1(R)	4900	
.1		1 1	7/29		658A			HFS-850-A	4000	
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	THAT THE ACTUAL					AG	BENCY COMMISS	ION		TOTAL RECONCILING
	THE PROGRAM LOG				and the second	NE	T DUE			Les MIAN 740
				-2.0						



wfmy.tv

P.O. Bon TV-2 * Greensboro, North Corollan 27420 * (919) 379-9369 A New Harle Television Space A CY/CLIENT

AG THEY PILLING AUDRESS JEFFERSON MARKETING PO BOX 19807 RALEIGH, N.C. 27619

WFMY TELEVISION CORP
MAKE P O BOX TV2
PAYMENT GREENSBORD, N.C. 27420
TO

REPRESENTATIVE SALES, JEFF

HELMS FOR SENATE

119

SALES, JEFF

(R)CAD F PRODUCT
SENATE

ORDER TYPE AGENCY EST. NC.

ANNOISE NO. P. GE BROADCAST MONTH

O7/20/84-07/22/84 CONTRACT YEAR

BILLING INSTRUCTIONS

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LINE# 3	357P-	558P	45000	1	7/21	SA	530P	30				AFR-1(R)	45000	
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wfmy-tv

P.O. Bes TV-3 · Greensbern, Horth Caroline 27430 · (919) 379-2309 A Hert-Harle Television Section ACY/CLIENT

EFFERSON MARKETING PO BOX 19807 LLI RALEIGH, N.C. 27619

WFMY TELEVISION CORP P O BOX TV2 AYMET GREENSBORD, N.C. 27420

REPRESENTATIVE	SALES, JEFF
ADVERTISER HELMS FOR SENATE 119	PRODUCT (R)CAD F/US SENATE

	WFMY	DATE 07/29/84
ORDER TYP	2	AGENCY EST. NC.
INVOICE NO. 403-048762	P. GE	BROADCAST MONTH JULY, 1984
SCHEDULE D/ 07/23/84-07/2		CONTRACT YEAR
mn s	ING INST	PLICTIONS

PAID FOR BY HE MS FOR SENATE AND NATIONAL CONGRESSIONAL CLUB AFR-1(R) 100000 AFR-1(R) 10000 AFR-1(R) 10000 AFR-1(R) 10000 AFR-1(R) 10000 AFR-1(R) 10000 AFR	RMATION	THAT THE ACTUAL	BROADCAST	s				AGEN	CY COM	MISSIC	N	56250	TOTAL RECON	1
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DUE 15TH OF MONTH FOLLOWING BROADCAST

JEFFERSON MARKETING
P.O. BOX 19807
RALEIGH

GREENSHORO, NC 27402

MAKE PAYMENT TO

 GUILFORD TELECASTERS, INC. P.O. 90X 1618 GREENSBORO, NC 27402 WGGT-TV

B407603443 PACA CARRONTHE AGENCY LA

SOS OS JULY YES

A 10 MILES AND ASS.

NC

27619

CLI PETRY CAND FOR US SENATE 7-29-84

JESSE HELMS -REP- SHO 4202 603443 006708

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		//					5	7-24		30	841P		S-850A	21	00	
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1												AC	TUAL GROSS BILLING		POB-10 IAL	

We warrant that the actual proadcast information shown on this invoice was taken from the program log.

ACTUAL GROSS BILLING 1,000 00 SUB-TOTAL

AGENCY COMMISSION 150 00 TOTAL RECONCEING ITEMS

NET DUE AMOUNT 850 00

ORIGINAL COPY

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7-29-34 8407386865 JEFFERSON MARKETING P. 0 .___ 19857 RATE CARD HE BROAD AST MONTH AMENCY SE RALEIGH 27519 1C 323 1 C JUL YES CONTRACT END DATE **新加州市的** REPRESENTATIVE PRODUCT MAKE PAYMENT TO R-CAND/U.S.SENATE/K 7-26-84 WGHP-TV, INC. LOCAL P.O. BOX 2588 COMMITTEE TO BALESPERSON NUMBER NOW CONTRACT NUM ADVERTISER HIGH POINT, N.C. 27251 331799 HELMS FOR SENATE COM POL 7002 386865 LCO CILIATION SCHEDULE **ACTUAL BROADCAST** STATI PAGE ENDOATER IN THE TEXT OF THE PROCESSION FROM PAGE AND PAGE IN THE PAGE AND THE PAGE AN (790) 3/23 7-20 8-11PM/88 7-20 FR 7-20 790 814P C 588/AFR-1R 7-23 MO 7-23 7-23 1 850 30 838P 242/HFS-850-A 3-11PM/BB 7-26 7-26 TH 7-26 3-11PM/0G .500 30 242/HFS-850-A 1500 928P 7-22 7-22 350 7-22 SU 30 1138A 588/AFR-1R 1000A0130P 7-20 7-20 FR 588/AFR-1 7-20 7-9AM 75 713A 7-20 FR 819A 588/AFR-1 75 7-23 7-26 2 2 2 2 7-9AM 7-23 140 31 809A 242/HFS-850-A 7-23 MO 242/HFS-850-A 30 846A 7-24 TU 30 713A 242/HFS-850-A 7-24 TU 30 851A 242/HFS-850-A 75 7-25 WE 75 30 717A 242/HFS-850-A 7-25 WE 30 819A 242/HFS-850-A 75 7-26 TH 242/HFS-850-A 75 30 724A 7-26 TH 30 816A 242/HFS-850-A 4,240.00 SUB-TOTAL MONTHLY COST CONFIRMATION 4.240 ACTUAL GROSS BILLING We warrant that the actual broadcast information shown on this invoice was taken from the program log. 636.00 TOTAL RECONCLING ITEMS AGENCY COMMISSION 3,604.00 NET DUE AMOUNT ORIGINAL COPY

AGENCY BILLING ADDRESS

AGENCY BILLING ADDRESS JEFFERSON MARKETING P. 0 00X 19817 RALEIGH

27619 16

MIVOICE NUMBER 8407386902 7-29-84

RATE CARD AND BEE DOCAST MONTHS AGENCY 323 10 JULY YES

网络证券

MAKE PAYMENT TO WGHP-TV, INC. P.O. BOX 2658 HIGH POINT, H.C. 27261

CONTRACT END DATE PRODUCT REPRESENTATIVE R-CAND/P & S 7-22-84 LOCAL

GALESPERSON NUMBER OUSTOMER RUMBER ADVERTISER 7002 386902 POL 831799 AMER. FOR REG/HELMS S

I RECONCILIATION SCHEDULE ACTUAL BROADCAST marinery of the for the control of t \$ 2905 30 588/AFR-1 7-20 7-20 600-7 AM 7-20 FR 637A 2905 75 7-20 FR 30 1229P 12N-1230P 588/AFR-1 7-20 7-20 7-21 7-21 30 588/AFR-1R 1 211-1 AM 7-21 | SA 30 1230M 2905 30 7-22 7-22 7-22 SU 588/AFR-1R 7A-1030A 30 30 758A 2905 7-27 SU 588/AFR-1R 31) 858A SUB-TOTAL A: K 185.00 MONTHLY COST CONFIRMATION 185 ACTUAL GROSS BILLING We warrant that the actual broadcast information shown on this invoice was taken from the program log. 27.75 TOTAL RECONCILING ITEMS AGENCY COMMISSION

NET DUE AMOUNT

ORIGINAL COPY

157.25

AGENCY-CHEMIC ADDRESS -JEFFERSON HARKETING P. O. BOX 19807 RALEIGH MAKE PAYMENT TO WGHP-TV. INC.

N C 27619

INVOICE NUMBER 8407386901 319 10

RATE CARD 12. BROAD AST MONTH 1887 AGENCY

YES

DATESON

7-29-84

JULY

P.O. BOX 2658 HIGH POINT, N.C. 27261

CONTRACT END DATE PRODUCT AND ADDRESS OF THE PRODUCT AND ADDRESS O We to the Second REPRESENTATIVE 1 7-22-84 R-CAND/U.S.SENATE/A LOCAL CUSTOMER NUMBER SALESPERSON NUMBER CONTRACT NUMBER 一种 化 图 1 ADVERTISER 831799 386901 AMER. FOR REG/HELMS S POL 7002

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MONTHLY COST CONFIRMATION

1,625

We warrant that the actual broadcast information shown on this invoice was taken from the program log-

1,625. CO SUB-TOTAL ACTUAL GROSS BILLING 243.75 TOTAL RECONCILING ITEMS AGENCY COMMISSION 1,381.25 NET DUE AMOUNT

ORIGINAL COPY

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Iv	We warrant	that the act	ual broadcas	st information sho	wn on this invoice	was taken from	the progra	ım log.	1 II -				AGENCY COMMISSION			100000	DINCILING ITEMS	
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INVOICE NUMBER LE ME AGENCY BILLING ADDRESS WRAL-TV 46628001 7-30-84 JEFFERSON MARKETING INC 2619 WESTERN BOULEVARD CHANNEL 5 P O BOX 19807 RALEIGH, NORTH CAROLINA 27605 919-821-8556 BROADCAST MONTH AGENCY RATE CARD RALEIGH N.C. 27619 434 JULY YES CONTRACT END DATE PRODUCT . REPRESENTATIVE MAKE PAYMENT TO -7-27-84-POL AMER. REAGAN WRAL-TV LOCAL ACCOUNTING DEPT CONTRACT NUMBER TO THE COSTOMER NUMBER SALESPERSON NUMBER ADVERTISER P O BOX 12000 QKO 0024 466280 640930 NCC - HELMS COMM RALEIGH NC 27605 ACTUAL BROADCAST SCHEDULE FIANT DATE INCIDENCE FOR THE PERIOD WAY PLAN FATEL HOW GATED FOR LENGTH STIME FOR LODGE CONTINUES OF THE PERIOD WAY FOR THE PER 754A AFR-1R 1929/1 (REP) 225\ 30 7-23 7-27 1 1 1 1 1 7-9A 3 225 7-23 MO 7-24 TU 30 AFR-1R 1929/1 (REP) 225 848A 30 225 AFR-1R 1929/1 (REP) 7-25 WE 719A 7-26 TH 30 AFR-1R 1929/1 (REP) 225 810A 30 225 7-27 FR 759A AFR-1R 1929/1 (REP) 30 225 2423 7-20 FR AFR-1R-1929/1 (REP) 7-20 7-20 2 -9A 3 225 745A 2423 AFR-1R 1929/1 (REP) 225 7-20 FR 859A MONTHLY COST CONFIRMATION 1.575.00 SUB-TOTAL ACTUAL GROSS BILLING 1.575.00 We warrant that the actual broadcast information shown on this invoice was taken from the program log. 236.25 TOTAL RECONCILING ITEMS Kathy Shever My Commission Expires 11-20-88 AGENCY COMMISSION NET DUE AMOUNT 1.338.75 OHIGINAL COPY

ONGRAM. CO. 1

VOICE/AFFYZAVIT-COPY 2

AGENCY: JEFFERSON MARKETING

P.U. BOX 17807

RALFIGH. NC

27617

27106

FEMIT: WXII-TV

PB BOX 11847

WINSTON-SALEM. NC



REPRESENTATIVE SALESMAN MANNING, ZACK **ADVERTISER** PRODUCT

MELMS FOR SENATE COMME HELMS SELICIANT CONC CAL 7/20-08/01/86

VIT-IIX 01/31/-4 AGENCY ESTIMATE NO. ORDER TYPE REVISION-03 CONTRACT NUMBER **BROADCAST MONTH** 1NV# 0981-01 5/25-07/29/8+ SCHEDULE DATES BILLING PERIOD

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INVOICE/AFFIDAVIT-COPY 2 GETCY: JEFFERSON MARKETING P.O. BOX 17807 MLEIGH NC

27617

REMIT: WXII-TV

PO LUX 11847 WINSTON-SALEM. NO



									310.1 01
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				MANNING	. ZACK			INV#	0981-02
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WXII-TV 08/29/34 PAUE: 1 ORDER TYPE AGENCY ESTIMATE NO. REVISION-04 · CONTRACT NUMBER **BROADCAST MONTH** 7/30-08/26/84

INV# 0981-02 SCHEDULE DATES **BILLING PERIOD**

STANDARD

	27106 SCHEDULE			*****			ACTUA	L BROADCAS	T			ECONCILIATIO	N
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AGENCY: JEFFERSON MARKETING

P.G. BOX 17807

27617

REMIT: HXII-TV

PO BOX 11847 WINSTON-SALEMA NO



REPRESENTATIVE	SALESMAN
	MANNING ZACK

A I ORDER TYPE 07/2	MGENCY ESTIMATENO
CONTRACT NUMBER	
CONTRACT NUMBER	BROADCAST MONTH
INV# 1145-01	6/25-07/29, BILLING PERIOD
SCHEDULE DATES	BILLING PERIOD

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GENCY: JEFFERSON MARKETING

F.O. BOX 19807 HALEIGH. NO

27619

REMIT: AXII-TV

PO SUX 11847

WINSTON-SALFM. NC

REPRESENTATIVE SALESMAN MANNING , ZACK ADVERTISER PRODUCT REPOSENATE COMMITTEE HELM, SENTHATEL CAG CA 7/23-08/01/6

ORDEN TYPE 07/3 LAGENCY ESTIMATENO. CONTRACT NUMBER BROADCAST MONTH INV# 1093-01 6/25-07/29/8 SCHEDULE DATES BILLING PERIOD

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AGENCY: JEFFERSON MARKETING

P.O. BUX 19807 RALEIGH. NC

27619

REMIT: WXII-TV

PO BOX 11847

WINSTON-SALEM. NC

REPRESENTATIVE SALESMANTES SAL MANNING . ZACK PRODUCT . 1800 ADVERTISER : REP-SENATE COMMITTEE HELMS SEN/NAT'L CNG CB

WX.1-IV 36/67/57 ORDER TYPE AGENCY ESTIMATE REVISION-02 CUNTRACE NUMBER OF BROADCAST MONT INV# 1093-02 7/30-08/26/ SCHEDULE DATES . BILLING PERIOD 7/23-08/01/94 STANDARD

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A TVX SIATION 3500 Myer Lee Dt, Winston-Sciern, NC 27101 919-722-4545

AGENCY PO BOX 19807
BILLING RALEIGH NC 27619
ADCRESS

MANE 3500 MYER-LEE PAYMENT WINSTON-SALEN, NC 27101

REPRESENTATIVE	TONY HOLLOWAY
ADVERTISER HELMS FOR SENATE COM 1239	HELMS

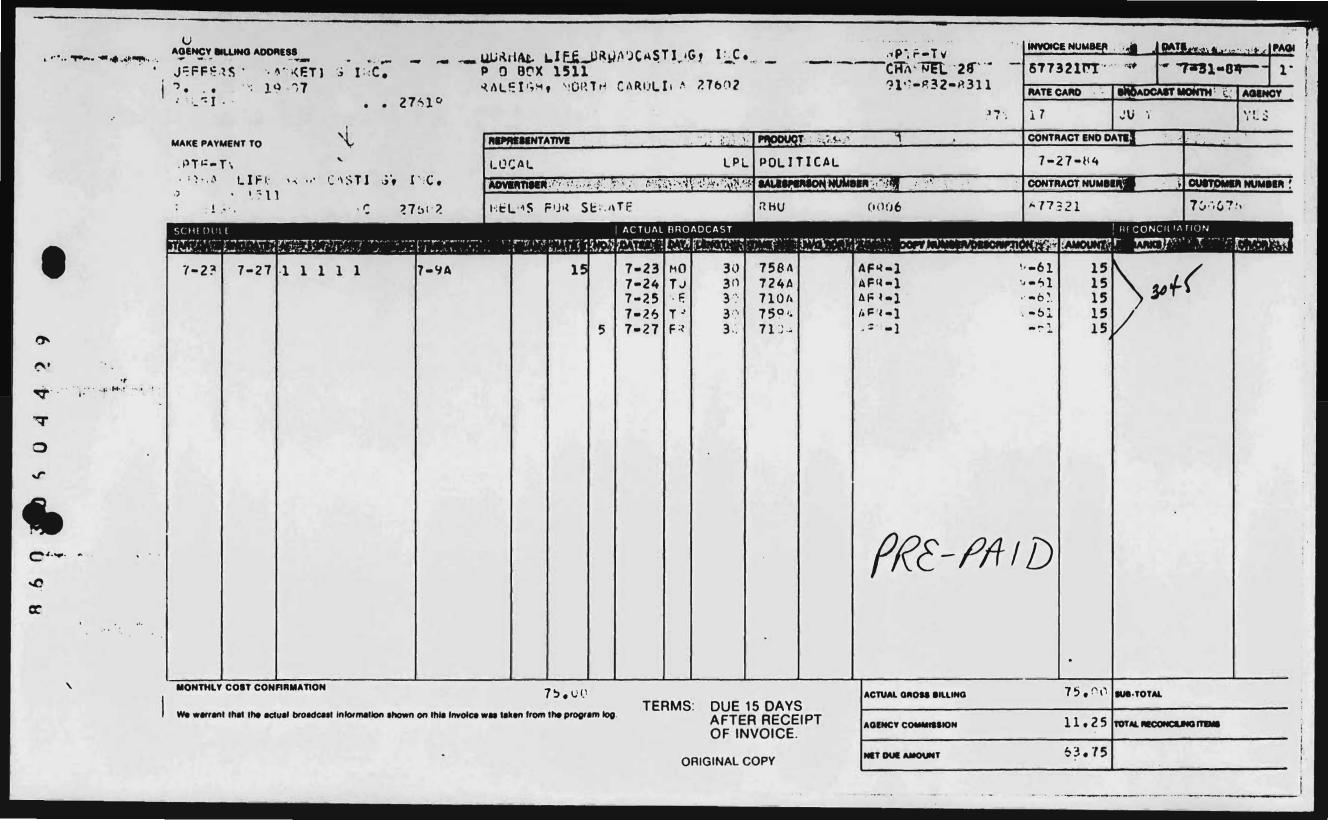
ORDER TYPE AGENCY EST. NO.

INVOICE NO. PAGE BROADCAST MONTH
1146-003096 1 JULY, 1984

\$CHEDULE DATES
07/10/84-07/29/84

BILLING INSTRUCTIONS

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AGENCY BILLING ADDRESS 1. The Property of Later Co. JEFFERSO" HARKETT IG THC. D. 1. 4 x 19507 MALELS .C. 27619 MAKE PAYMENT TO PTF-TV DOMENA LIFE BREADCASTI G. INC. 9 . - X 1511 10 27602 IL-IGH

DURHAM LIFE BROADCASTING. INC. P 0 ADY 1511 RALEISH, MORTE CAROLINA 27602

.. FTF-TV CHANNEL 28 934-P32-P311

MYOICE NUMBER > 100 DATE 7-31-84 67733101 RATE CARD BROADCAST MONTH AGENCY 453 17 J-14 6

REPRESENTATIVE	PRODUCT	CONTRACT END DATE	
LUCAL	PL PGLITICAL	7-22-94	
ADVERTIGER	SALESPERSON NUMBER 788	CONTRACT NUMBER	CUSTOMER NUMBER
HELMS FUR SENATE	R80 0006	677331	760673

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MONTHLY COST CONFIRMATION

We warrant that the actual broadcast information shown on this invoice was taken from the program log.

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70.00

TERMS: DUE 15 DAYS AFTER RECEIPT

OF INVOICE.

70 . 10 SUB-TOTAL ACTUAL GROSS BILLING 1 .5 TOTAL RECONCILING ITEMS AGENCY COMMISSION 59.50 NET DUE AMOUNT

ORIGINAL COPY

0 AGENCY BILLING ADDRESS JEFFERS: A KETI & I.C. 1 P. N. . X 19807 RALETON . 27 -14 MAKE PAYMENT TO WPICETY . DURMA . LIFE BROADCASTING. INC. D . ROX 1511 RALHIGH °C 27692

DURHAM LIFÉ BROADCASTI 45+ I C. P. D. BOX 1511 DALGISH: JORT CAROLI A 270 & PTF-TV CHAMMFL 28 919-1-32-6311 67729701 7-21-04 2

RATE GARD BROADCAST MONTH AGENCY

377 17

JUI. YES

CONTRACT END DATE REPRESENTATIVE PRODUCT 4. d=12=64 LPL POLITICAL LOCAL ADVE TIMEN BALESPERSON NUMBER CONTRACT NUMBER CUSTOMER NUMBER 760576 BILC 677297 20.6 HELMS FOR SHITATE

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MONTHLY COST CONFIRMATION

660.00

We warrant that the actual broadcast information shown on this invoice was taken from the program log.

TERMS: DUE 15 DAYS
AFTER RECEIPT
OF INVOICE.

ORIGINAL COPY

ACTUAL GROSS BILLING 630 . 00 SUB-TOTAL 2.0

AGENCY COMMISSION 94 . 5.2 TOTAL RECONCURGITEMS 3.0

NET DUE AMOUNT 535 . 50

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HAVOICE NUMBER DATE SUPERING HE PAGE MPTF-TV AGENCY BILLING ADDRESS DURHAM LIFE BRUAUCASTING, INC. CHARNEL 28 67729701 7-31-04 JEFFERSO : MARKETING INC. P 80x 1511 PALEIGH, SUSTI CARBLI - 275 2 919-532-8311 P. O. BOX 19807 RATE CARD BRO DCAST MONTH AGENCY RALEION .C. 27515 YES 17 LY 37 CONTRACT END DATE PRODUCT REPRESENTATIVE MAKE PAYMENT TO 8-12-84 POLITICAL LICAL .PTF-TV DURHAM LIFE BROADCHSTI G. I.C. The state of the state of the state of SALESPERSON NUMBER CUSTOMER NUMBER ADVERTIGER CONTRACT NUMBER P 0 MUX 1511 RHU 577297 700076 HELMS FOR SENATE 0006 RALEIGH 27602 RECONCILIATION **ACTUAL BROADCAST** SCHEDULE TATE OF THE PARTY 30 10584 7-15 HFS-850-A 8-12 3 3 3 3 3 10/4-3P V-60 15 7-16 - G 30 1128A HFS-050-A w=611 HFS-n50-A 7-16 301 228P V-6" 7-17 TU 3 10584 HFS- 15 -- 4 V -6. 15 30 1259P HFS-550-4 Y=61) 7-17 TU 7-17 30 1290 HFS---50-A V=60 30 958A HFS-650-A 7-13 V-6: 7-13 30 10584 HFS- 50-A 1-5 7-18 1229P 3:1 HF5- 50-A 15 3.7 95HA 1-FS--511-A 7-19 -51 31) 1.158/ AFS- 5J-A 15 7-15 v = 51 15 7-19 224P HFS-: 50-A V=6: 3 C V-6458 10564 AFH-D 7-27 37 12280 #-645A 30 .12599 -5453 30 1:27.4 HF5- 15 -A 30 1058A 7-23 155- 50-A 15 3 1 129P -FS- 150-A v-6 7-23 15 FS-, 511-A 3) 1028A V-5 7-24 1-6 15 7-24 1: 584 FS=> 57-1 12290 15 3 7-24 15 7-25 45MA - F5=1.50=1 1:540 15 7-25 F5-650-0 - - 5 15 7-25 1299 HFS-85/1-A CONTINUED BEXT PAGE MONTHLY COST CONFIRMATION SUB-TOTAL ACTUAL GROSS BILLING TERMS: DUE 15 DAYS We warrant that the actual broadcast information shown on this invoice was taken from the program log. AFTER RECEIPT TOTAL RECONCILING ITEMS AGENCY COMMISSION OF INVOICE. NET DUE AMOUNT

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CURHAM LIFE BRUAUCASTI G. I.C.

AGENCY BILLING ADDRESS

PTF-TV

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WTVD

P.O. BOX 2009 DUBIAN. NC

27702

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DATE AUG 0 2 1584 2229 L

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WTVD

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27702

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INVOICE NO.

DATE AUG 02 1984 2029 L

CONTRACT NO.

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	WE WARRANT THAT T	HE ACTU	AL BROA	DCAST INFO	OITAMR	N SHOWN ON TH	S INTO	DICEWAS	JAKEN FRE	M THE PROGRE	M LOG.		OK DI	JE	561.	00

MTVD=TV P.O. BOX 2009 DURHAM. NC 2770?

DATE AUG 02 1984 2229 1.

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DATE AUG 0 2 1984 5550 1

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PRESENTATIVE FCA VERTISER ELMS SEP ONGRESSIONAL O	PRODU	PEARC	P CAHI)	BILI	ENCY: P.O. LING PALE DRESS: ATTN	BOX	1980	7619		6 PA		OOS 181	
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NET DUE WTVD

WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THE INPOICE WAS, TAKEN FROM THE PROGRAM LOG.

ARE PAYMENT TO	P.O.	BOX 15366●	DURHAM, NORTI	H CAROLINA 27704 • (919) 471-4461 (COMPAS) AND	DONTE
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CLIENT 1

WNCT-TV 9

WNCT-TV 07/31/84 PAGE: 1

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REMIT: WNCT-TV P. O. BOX 898 GREENVILLE, N.C.

P.O. Box 898 Greenville, N.C. 27834 (919) 756-3180

REVISION-01

27834 **BENCY!** JEFFERSON MARKETING 3825 BARRETT DRIVE

PERETIC, BOB/REGIONAL REGIONAL INV# 8128-03 6/25-07/29/84

RALEIGH, N.C.

HELMS FOR SENATE HELMS FOR SENATE/YG PL Let Bridge Carry 7/13-07/26/84 STANDARD

27619

TERMS: DUE AND PAYABLE UPON RECEIPT OF INVOICE

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EMIT: WNCT-TV Ô P. O. BOX 898 GREENVILLE, N.C. 27934 ENCY! JEFFERSON MARKETING

3825 BARRETT DRIVE

RALEIGH, N.C.

WIE

CLIENT 1

WNCT-TV 9

Roy H. Park Broadcasting, Inc. P.O. Box 898 Greenville, N.C. 27834 (919) 756-3180

Cimmore in installation REGIONAL PERETIC, BOB/REGIONAL HELMS FOR SENATE HELMS FOR SENATE/WM. 41

ORIGINAL and the second second second The transport of the state of the INV# 8112-02 THRU 07/25/84 ating with the real type control that The service of the same of the 7/16-07/20/84 **BTANDARD**

07/26/84

PAGE: 1

WNCT-TV

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PLEASE RETURN COPY WITH YOUR REMITTANCE

CLIENT 1

WNCT-TV 9 Roy H. Park Broadcasting. Inc.

Rent

Roy H. Park Broadcasting. Inc. P.O. Box 896 Greenville, N.C. 27834 (919) 756-3180 WNCT-TV 07/26/84

PAGE: 1

REMIT: WNCT-TV
P. 0. BOX 898
GREENVILLE, N.C.

27834

GENCY: JEFFERSON MARKETING 3825 BARRETT DRIVE RALEIGH, N.C.

27619

OFFICE SPECIFICATION OF STREET	Seales Charachermanners of the
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HELMS FOR BENATE	HELMS FOR SENATE

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7/21-07/22/84	STANDARD

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REMIT: WNCT-TV P. O. BOX 898 CLIENT 1

WNCT-TV The second of th

07/31/84 PASE! 1

GREENVILLE, N.C.

GENCY: JEFFERSON MARKETING

RALEIGH, N.C.

3825 BARRETT DRIVE

27934

27619

M-BAT 559-6P

1130PH

THE CHEST LE CONTROL THE BELLEVILLE

P.O. Box 898 Greenville, N.C. 27834 (919) 756-3180

1995 INV# 8154-02

6/25-07/29/84

7/25

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7/23-07/27/84

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DRIGINAL

STANDARD

English of Continues and the Continues of the
PERETIC, BOB/REGIONAL
ECONOMICS CONTRACTOR
HELMS F/SENATE/REAGAN

859A

TERMS: DUE AND PAYABLE UPON RECEIPT OF INVOICE B00AM-0900AM 40.00 MO 7/23 759A 30 AFR#1 7/24 30 TU 825A AFR#1

250.00

160.00

7/26 TH 30 759A AFR#1 40.00 7/27 30 FR BOOA AFR#1 40.00 7/26 TH 558F 30 AFR#1 250.00 7/27 558P 30 FR AFR41 250.00 7/26 TH 1129P 30 AFRe1 160.00 7/27 FR 1129P 30 AFRe1

AFR#1

30

160.00

40.00

40.00

40.00

PAYMENT DUE WITHIN 10 DAYS
OF RECEIPT OF INVOICE

INVOICE / AFFIDAVIT

My Commission Expires May 14, 1988

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867.00

GE 21 7/31/84
INVOICE AFFIDAVIT WITN-TV, INC.

JEFFERSON MARKETING PO BOX 19807 3825 BARRETT DR. SUITE 301 RALEIGH, NC 27619 WITN-TV
PO BOX 468 HWY 17 SOUTH
WASHINGTON, NORTH CAROLINA 27889

COPY 1

ADVERTISER

2435

HELMS POL/REP

SALESMAN

FRANK BRADY

BROADCAST MONTH

JULY

BILLING PERIOD

7/23-7/29/84

	SCHEDULE		- 0.1			-12					ACTUA	L BROADC	AST			BCONCILIATION
TIME	RATE	NO.	M TU	w	TH	F 84	SU	DATES	DAY	TIME	DUR.	M/G FOR	PRODUCT/FILM	PATE	DEBIT/CREDIT	REMARKS
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								7725			30		AFR-1	₹3 d	da !	
						18				7:15A	30		AFR-1-R		1 3041	
								7/27	FR	8:21A	30		AFR-1-R	\$30		
SU 5:58-7P	\$140	1	2013			EE	1	4 - 20 D		D 6:30	PH			*.caup		
			701	ו		, EE	ì			6:28P	30		HFS-850-A	9140	- mussial	
SU 5:58-7P	\$140	1				1		1720		0.20	30		111 3-030-H	7140	- 1	
***			RUN	A	FT	ER		6:57 PI								
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SU 11-11:30P	\$65	2	1		1	1										
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		-								11:29P	30		HFS-850-A	\$65	-min	u)
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SCHEDULE CO	ST FOR THIS BIL	LING P	ERIOD				1	ACTUAL G	BOSS (BILLING	AGENO	Y COMMISS	SION NET DE	ue .	SUB-TOTALS	RECONCILIATION
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/22/84 INUNTER # - BANZOOF

INVOICE AFFIDAVIT WITN-TV, INC. 0

JEFFERSON MARKETING PO BOX 19807 3825 BARRETT DR. SUITE 301 RALEIGH, NC 27619

COPY 1

P.O. BOX 468 MWY 17 SOUTH WASHINGTON, NORTH CAROLINA-27889 919-946-3131

DAGE 1

ADVERTISER 2435

HELMS POL/REP

SALESMAN

FRANK BRADY

BROADCAST MONTH

JULY

BILLING PERIOD

7/16-7/22/84

	SCHEDULE											ACTU	IAL BROADC	AST			RECONCILIATION
TIME	PATE	NO.	M T	U W	TH	F	24	SU	DATES	DAY	TIME	DUR.	M/G FOR	PRODUCT/FILM	RATE	DEBIT/CREDIT	REMARKS
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									7/18		8:291	30		HFS-800-A	\$30	1.0.0	a set
7-9A	\$30	2		1	1		- 00		7/20	FR	7:20A	30		AFR-1	\$30	V 35-3	2905 20
	***				1.				7/17	TU	8:29A	30		HFS-850-A	\$30		
									7/19	TH	7:29A	30		HFS-850-A	\$30		8623
U 11-11:30F	\$65	1	RUI			1.			:28 PI								
			יקר	1	Τ.	5					11:29F	30		HFS-850-A	\$65		
U 11-11:30F	\$65	2					1								100		
***			RUI	N	AFT.	ER		1	#28 FI		44.000	70		100 000			
									7/20	SA	11:28P	30		HFS-850-A	\$65 \$65		1
1130F-1230A	\$35	1		1											100		
1130P-1230A	\$35			1.					7/17	TU	12:28A	30		HFS-850-A	\$35		
11301-1230H	=30	1		1					7/18	WE		30		NONE		\$35CR	NET OVER RUI
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				1									43.73				
SCHEDULE C	OST FOR THIS BE	LLING	PERIO		1	Ш			ACTUAL	OROSS	BILLING	AGE	NCY COMMIS	SION NET DI	Æ	SUB-TOTALS	RECONCILIATION
			\$4:	15	00				1 4	Zzd	0 db.	4 (Q £7	60 5 8 \$32	3.00		\$35.00CR

7/24/84

INVOICE AFFIDAVIT WITN-TV, INC.

JEFFERSON MARKETING PC BOX 19807 3825 BARRETT DR. SUITE 301 RALEIGH, NC 27619

COPY 1



ADVERTISER 2435 HELMS POL/REP SALESMAN

BROADCAST MONTH JULY BILLING PERIOD

FRANK BRADY

7/16-7/22/84

	SCHEDULE		700		100						ACTU	AL BROADCA	187			EGONCILIATION
TIME	RATE	MO.	M TU	w	TH I	24	SU	DATES	DAY	TIME	DUR.	M/G FOR	PRODUCT/FILM	RATE	DEBIT/CREDIT	REMARKS
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						0. 3		7/17		12:29F	30		HFS-850-A	\$35		
	į.				1	10.5		7/18		2:24P 3:25F	30		HFS-850-A HF <u>S-</u> 850-A	\$35 \$35		
		1 1			13			7/20		3:56F	30		AFR-1-R		1000	
58A-1227F	1 \$30	3	1	1		1				13 * J(3)	30			200	المراسيا	
***	100		RUN	B	FO	RE	N	NON								
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		1	1		13	10.3				11:59A	30		HFS850,-A	\$30		
								7/20	FR	11:59A	30	1	AFR-1	- 930	1,0905	
5-7A	\$25	5	1 1	1	1	1					7.0			4.75		
								7/16		6:11A 6:36A	30		HFS-850-A HFS-850-A	\$25 \$25		
								7/18		6:52A	30		HFS-850-A	\$25		
1								7/19		6:58A	30		HFS-850-A	\$25		1 /
	1	1	V					7/20		6:20A	30		AFR-X	\$25	12906	
9-11:574	\$30	5	1 1	1	1	1			-					170. Dr. 10000.214 1 1.100	1	
								7/16	MO	9:33A	30		HFS-850-A	\$30		
						10/4		7/17		10:58A	30		HFS-850-A	\$30		
	1							7/18		9:32A	30		HFS-850-A	\$30		
	1							7/19		9:31A	30		HFS-850-A	\$30	1290	
5:00-5:57P	\$50	1 2	١,		.1			7/20	1. K	9:31A	30		AFR-1	\$30	1	
3.00-3.37	\$30	2	1		1					1 1 7 1						
															2	
SCHEDULE CO	ST FOR THIS BI	LLING F	PERHOD					ACTUAL	GROSS	BILLING	AGE	NCY COMMISS	SION NET	OUE	SUB-TOTALS-	RECONCILIATION

7/24/84 E 24 7/24/84 Q THYCICE AFFIDAVIT WITN-TV, INC.

> JEFFERSON MARKETING FO BOX 19807 3925 BARRETT DR. SUITE 301 RALFIGH, NC 27619

COPY 1 WASHINGTON, NORTH CAROLINA 27889 919 946-3131

ADVERTISER 2435 HELMS POL/REP SALESMAN

FRANK BRADY

BROADCAST MONTH JULY BILLING PERIOD 7/16-7/22/84

	SCHEDULE	Name of the last	34			33044		-		-	ACT	AL BROADC	AST			RECONCILIATION
TIME	RATE	MO.	M TU	w	TH I	SA	SU	DATES	DAY	TIME	DUR.	M/G FOR	PRODUCT/FILM	RATE	DEBIT/CREDIT	MEMARKS
******	1 34 34 34 34 34 34 M															
026 U.S. SEN	(KNOX)	***	***	**	*											
7-9A	\$30	1			1	1		7/20	ER	8:21A	30		AFR-1	670	12023	
7-9A	-\$30	4	1 1	1	1			7720	[``				-			
						1	1	7/16		7:15A	30		HFS-850-A	\$30		
							8	7/17		8:144	30		HFS-850-A	\$30		
			30					7/18		8:59A	30		HFS-850-A	\$30		
130F-1230A	\$35	1		П				7/19	ПН	7:59A	30		HFS-850-A	\$30		
			1					7/20	FR	11:59P	30		AFR-1-R	\$35	13623	`
130P-1230A	\$35	4	1 1	1	1			7/4/	-					****	desta e granistic	
							П			12:03A 12:17A	30	4	HFS-850-A 1	80 \$35	0	
				1 1				7/18		15.11H	30		NONE .	\$35		NET OVER RI
					10			7/19	TH	11:37P	30		HFS-850-A	\$35	(33)	HET OVER K
IALS	\$100	1					1									/
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	1 = 1							7/22	SU	2:08P	.30	. 1	ARF-1-R	\$100	12623	
BALL.	\$125	1				1								Cittoria.		1/
***			Khu	B	THE	EN		14 85:					150 1 0	4405	4.43	
								7/21	DA	4:36P	30		AFR-1-B	\$125	1 2623	
	. 12															
4,50																
														1		
									-				7			
SCHEDULE COST	FOR THIS BIL	LING PE	PNOO	Ш		L	Ц	ACTUAL	GROSS	BILLING _	AGE	CY COMMIS	SION NET DU		SUB-TOTALS	RECONCILIATION
					-		-	ACTUAL	7	0	-	1	U 9 8			

IE 25 7/24/84 WITN-TV, INC.

JEFFERSON MARKETING FO BOX 19807 3825 BARRETT DR. SUITE 301 RALEIGH, NC 27619



ADVERTISER 2435 HELMS POL/REP BALESMAN

FRANK BRADY

BROADCAST MONTH JULY BILLING PERIOD 7/16-7/22/84

	#: 8407098 FAGE						55550				CONCILIATION			
						-				AL BROADCAS				
TIME	RATE	NO.	M TU	W TH	F SA S	DATES	DAY	TIME	DUR.	M/G FOR	PRODUCT/FILM	RATE	DEBIT/CREDIT .	REMARKS
******	****	***	***	****	****									
41 US SENCE	AGAN+	***	***	***	****									
5:58-7F	\$140	1											7	
FALL	\$125				1	7/22			30	1	AFR-1-R	\$140	189	
***			RUN	BET	HEEN	7/21	AN SA	D 7:00 2:08F	PM 30		AFR-1-R	\$125	1 1	,
'-7:57Fm	\$130	1			1	7/21	SA	7:56P	30		4FR-1-R	\$130		,
												1,-16		
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	MAT P													
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SCHEDULE COS	FOR THIS B	ILLING P	ERIOD			ACTUAL			AGEI	NCY COMMISSI	ON NET C	DUE	SUB-TOTALS	RECONCILIATION
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2325 N. N.C.

27619

JEFFERSON MARKETING

P.O. HUX 19807

RALEIGH. N.C.



HERITAGE BROADCASTING CO. FOR EASTERN N.C. P.O. BOX 2325, NEW BERN, N.C. 28560 (919) 637-2111

REPRESENTATIVE SALESPERSON

WCTI/REGIONAL ARCHIE PUSSELL/REG

ADVERTISER PRODUCT

HELMS FOR SENATE HELMS/ KNOX BUY

ORDER TYPE	AGENCY ESTIMATE NO.
ORIGINAL	TELF LINE
INVOICE NUMBER	. BROADCAST MONTH
INV# 2437-01	6/25-07/29/84
SCHEDULE DATES	MILLING PERIOD
7/13-07/26/84	STANDARD

						SCHEDULE					400	ACTUAL			ECONCHIATI	ON		
TU	1	TH	F	54	SU	TIME	RATE	NO.	DATES	DAY	TIME	WANT THE	M/G FOR	COPY NUMBER	RATE	DEBIT	CREDIT	REMARKS
7	7		X			7-9A M-F	35.00	4	7/13	FR	8464	30		HF 58 1 1	35.00			
	1								7/13		859A	30		HF 5811	35,00			
	1								7/20	FR	818A	30		HFS-850A	35.00	Inices		
						Marie L.			(2750)	FR	850A	30		HFS-850A	35.00) MISSED		
x z	×	x	- 0			7-94 M-F	35.00	16	7/16	MO	745A	30		HF 5850A	35.00			
			2						7/16	MO	817A	30		HF SB50A	35.00	/		
	- 1								7/17	TU	759A	30		HFS-850A	35.00			1
	-1		- 3	1					7/17	TU	811A	30		HFS-850A	35.00			
									7/18	WE	711A	30		HF 5-850A	35.00			
	-1			1				1	7/18	WE	720A	30		HF5-850A	35.00			
							2		7/19	TH	752A	30		HFS-850A	35.00			
					1				7/19	TH	850A	30		HFS-850A	35.00	No.		
		34		1	1		7		7/23	MO	753A	30		HFS850A	35.00			
	-1								7/23	MO	859A	30		HFS850A	35.00			
	-1								7/24	TU	743A	30		HFS850A	35.00			1
	- 1	-14		1	3				7/24	TU	846A	30	30	HFS850A	35.00			
7		80,							7/25	WE	718A	30		HFS850A	35.00			
		- 4		1				1	7/25	WE	759A	30		HFSB50A	35.00			
	-1			1					7/26	TH	710A	30		HFS850A	35.00			
									7/26	ТН	812A	30		HFS850A	35.00			
1	-1			×		5-630P SAT	60.00	2	7/14	SA	523P	30		HFS811	60.00	4		
				ľ				1			629P	30	_ <	AFR-1	60.00	D2423	17-	
					×	AM. SPORTSMAN	60.00	1	7/15	su	238P	30		HFS811	60.00			
			×			800PM-1100PM	225.00	1	7/13	FR	81 3P	30		HF 5811	225.00			
-	1				×	800PM-1100PM	300.00	1	7/15	su	1032P	30		HFS811	300.00			
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	7	ŕ	SC	HE	NI.	E OF FORTHE BILLING P	ERIOD		ACTUAL	GROSS	5 BILLING	AGENC	COMMISS	ION NE	TOUE	SUB-TO	OTALS	RECONCILIATI
7				112		V			8 5	b	PO	5 0	20	9 8				

WCTI-TV

P.O. BOX 2325 NEW BERN. N.C.

HERITAGE BROADCASTING CO. FOR EASTERN N.C. P.O. BOX 2325, NEW BERN, N.C. 28560

(919) 637-2111

RXO

wCTI-TV

7/20-07/21/84

ORDER TYPE AGENCY ESTIMATE NO. DRIGINAL INVOICE NUMBER BROADCAST MONTH 6/25-07/29/84 INV# 2615-01 SCHEDULE DATES BILLING PERIOD

07/30/84

PAGE: 1

STANUARD

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JEFFERSON MARKETING P.O. POX 19807 RALEIGH. N.C.

27619

REPRESENTATIVE	SALESPERSON
WCTI/REGIONAL	ARCHIE RUSSELL/REG
ADVERTISER	PRODUCT
HELMS FOR SENATE	HELMS FOR SENATE

	100				SCHEDULE						ACT	JAL BROADCA	ST			RECONCILIATI	ON
U	W Th	4 -	3/	SU	TIME	RATE	NO.	DATES	DAY	TIME	HALL I	MG FOR	COPY NUMBER	RATE	DEBIT	CREDIT	REMARK
Т		×			6-7P M-F	175.00	1	7/20	FR	600P		30	AFR-1	175.00			-
1		1											(E.		11.00	1	
1		1	×		11-1130P M-S	100.00	1	7/21	SA	1129P		30	AFR-1	100.00	189	b	
			l _x		5-630P SAT	60.00	1	7/21	SA	559P		30	AFR-1	60.00			
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	-11	30	LHE	DUL	CONTENT THE SELLING	335.00				5 POO C		O SO. ES		84.75	SUB-T	OTALS	RECONCILI

WCTI-TV P.O. BOX 2325 NEW BERN. N.C.

HERITAGE BROADCASTING CO. FOR EASTERN N.C. P.O. BOX 2325, NEW BERN, N.C. 28560

(919) 637-2111 000

ORDER TYPE AGENCY ESTIMATE NO. DRIGINAL INVOICE NUMBER BROADCAST MONTH 6/25-01/29/84 INV# 2523-01 SCHEDULE DATES BILLING PERIOD

07/30/84

PAGE: 1

STANDARD

WCTI-TV

7/23-07/27/84

JEFFERSON MARKETING P.O. NOX 19807 RALEIGH. N.C.

27619

28560

REPRESENTATIVE	SALESPERSON
WCTI/REGIONAL	ARCHIE PUSSELL/PEG
ADVERTISER	PRODUCT
HELMS FOR SENATE	HELMS FOR SENATE
(1.22.10) 01. 02 11.12	TIERTS TON SENATE

				SCHEDULE		100	London Company		المستحد والمستقل		BROADCAS	T			RECONCILIATI	ION
72	W	TH	F SA SU	TIME	RATE	NO.	DATES	DAY	TIME	HAN I SEC	M/G FOR	COPY NUMBER	RATE	DEBIT	CREDIT	REMAR
×	×	X	x	7-9A M-F	35.00	5	7/23	MO	859A	30		AFR-1	35.00			
	-	8		1			7/24	TU	811A	30		AFR-1	35.00			1
	- 1						7/25	WE	859A	30		AFR-1	35.00			
1 1						200	7/26	TH	747A	30		AFP-1	35.00			
	1					1703	7/27	FR	819A	30		AFR-1	35.00			
×	×	x	x	130PM-1230AM	40.00	5	7/23	MO	1228A	30	a	AFR-1	40.00			
	2						7/24	TU	1215A	30		AFR-1	40.00	1	./	
П	-1					1 8	7/25	WE	11470	30		AFR-1	40.00		1048	
	-1						7/26	TH	1215A	30		AFR-1	40.00	71 -	1	
Н							7/27	FR	12114	30		AFR-1	40.00			
		×	x	6-7P M-F	175.00	2	7/26	тн	559P	30	1	AFR-1	175.00			1
							7/27	FR	659P	30		AFR-1	175.00			
		×	×	1-1130P 'M-S	100.00	2	7/26	тн	1129P	30		AFR-1	100.00			
							7/27	FR	1130P	30		AFR-1	100.00			1
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K	2	4	Charle	MOUNTE JAN	060				/ *	2 5	10	71 41	3			
	_	1.	SCHEDUCE	COST PINE THIS MILLING PE	ERIOD		ACTUAL	GROS!	BILLING	AGENCY	COMMISSI	ON NE	T DUE	SUB-T	OTALS	RECONCIL

WCTI-TV P.O. BOX 2325 NEW BERN. N.C.

WCTI

HERITAGE BROADCASTING CO. FOR EASTERN N.C.
P.O. BOX 2325, NEW BERN, N.C. 28560
(919) 637-2111

ORDER TYPE AGENCY ESTIMATE NO.

REVISION-06

INVOICE NUMBER BROADCAST MONTH

INV# 2388-01 6/25-07/29/84

SCHEDULE DATES BILLING PERIOD

7/16-08/10/84 STANDARD

07/30/84

PAGF: 1

wCTI-TV

28560

JEFFERSON MARKETING P.U. BUX 19807 RALEIGH, N.C.

27619

REPRESENTATIVE	SALESPERSON					
WCTI/REGIONAL	APCHIE RUSSELL/REG					
ADVERTISER	PRODUCT					
ELMS FOR SENATE	HELMS/WOMAN'S BUY					

				SCHEDULE						ACTUAL			RECONCILIATIO	N		
TUX	11	HF	SASU	TIME	RATE	NO.	DATES	DAY	TIME	TAPE	M/G FOR	COPY NUMBER	RATE	DEBIT	CREDIT	REMARKS
3 6	X	X		11A-4P M-F	40.00	10	7/16	MO	1259P	30		HFS850A	40.00			
		10					7/17	TU	234P	30		HFS-850A	40.00			
		18			8	1	17/18	WE	159P	30		HFS-850A	40.00			
							7/19	TH	159P	30		HFS-850A	40.00		-	
- 1							7/20	FR	359P	30	(HFS-950A	/40.00-	-Muse)
						1.	,7/23	MO	1159A	30		HFS850A	40.00		10	Y
						1/	7/23	MO	1228P	30		HFS850A	40.00	/		
						1	7/24	TU	1129A	30		HFS850A	40.00	/	1 ,0	
						1	7/25	WE	234P	30		HFS850A	40.00	\ /	V	
							7/27	FR	1159A	30		HFS850A	40.00	V.	2	
×	,			7-730P M-F	135.00	4/	17/17	TU	721P	30		HFS-850A	135.00		0	
			1 1			1	1/19	TH	708P	30		HFS-850A	135.00			
	1					1	7/24	TU	726P	30		HFS850A	135.00			
	1					1	7/26	тн	712P	30		HFS850A	135.00	200		
		×		530-6P M-F	100.00	6	7/16	MO	558P	30		HFS850A	100.00			
							K7/18	WE	529P	30		HES-8504	100.00			
41	1						7/20	FR	556P	30		HES-8504	100.00	- Musse		
	1						7/23	MO	542P	30		HFS850A	100.00			
	1	88				1.	¥ 7/25	WE	557P	30		HFS850A	100.00			
	1					1	7/27	FR	530P	30		HFS850A	100.00			
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-	1	\$0	CHEDUL	E SON FOR THE MALLING	PERIOD		ACTUAL	GROS	S BILLING	AGENC	COMMISS	ION NE	TOUE	SU8-1	OTALS	RECONCILIATIO

INVOICE

AGENCY BILLING ADDRESS

JEFFERSON FARKETING INC. P O ECK 19807

RALEICH

NC 27619

ATLANTIC TELECASTINE, CCRP.
P D BCX 4C29-AZALEA STATICA
WILMINGTON, NORTH CARCLINA 26406

NECT-TV CHANNEL 6 915-751-6070 A74735C1 7-25-E4 1
RATE CARD PAGE

AATE CARD WAS SNOADCA EMONTH AGENCY

L CC JLIY YES

MAKE PAYMENT TO

PO BCX 4C29-AZALEA STATION
WILMINGTON NC 28406

					the second secon		
REPRESENTATIVE		PRODUCT	到时间,还是有用 信息。		CONTRACT END DATE		ole sections
RECICNAL	FCL	US SENATE	REP .		6-C5-E4		
公公司 田(本 海海里)	建筑	AUTOR RECORD NO	的自然的特別的	N/III	CONTRACT NUMBER	F Eve	TOMER NUMBER
HELMS FOR SENATE		HSE	5995		474735	74	C62C

SCHEDU						BROADCAST				CHATION
Ti berile	NAME OF STREET	WEITH THE REPORT	THE TEN PERIOD WE ARE THAT	NA ROTES PARCE	SECTION.	HEAVY AND DOMESTIC	是是基本的	THE PROPERTY AND MARKET THE PROPERTY OF THE PARTY OF THE	AMOUNTA REMARK	MERITA DIVENSIS
INVCI	TE BIL	LING DATES:	C7/16/64-C7/22784							
7-16	7-22	11111	6-7AF	35	7-16	ME 30	625A	HFS-850-A	35	
					7-17			HF S- 65 0- A	35	
					7-18			HF S-85C-A	35	
					7-19	Committee of the Commit	and the second s	HES-850-1	35	
					7-20	C-6-3-707 5 C-6-2-7	and the second s	AFR-1 AMERICAN FOR REA	3 1290	×
7-16	7-22	11111	7-5AM	45	7-18			HF3-8-U-A	45	Baltin Charles
					7-17			HFS-85C-A	45	
	t.		A Comment of the Comm		7-18		723A	HFS-850-A	45	
			10		7-15		822A	HFS-850-A	45	
				9	7-20	FR 30	ASSA	AFR-1 APERICAN FOR REA	15 V 24	23
7-16	7-22	ROTATING	110-113CAF	35	7-17	TU	10564	HFS-650-X	35	,
			r	2	7-18		1658A	HF S- 85 0- A	35	
7-16	7-22	11111	12h ACJ	1 _39_	7-16	KC 30		HF S- 65 C- A	35	E- 11 20
				+	7-17			HF S- 65 C- A	35	
					7-18			KF S- 65 G- A	35	
			T 1	1 1 .	7-19			HFS-850-A	35	
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7-16	7-22	1 1 1	1130A-12N	35	31-1			RFS-850-A	35	,
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		_			7-19			HFS-85C-A	09 V 38	45
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					3					
ONTHLY	COST CONF	IDMATION							All residence in the second state of	

MONTHLY COST CONFIRMATION

We werrent that the adjust broadcast information shown on this invoice was taken from the program log

ORIGINAL COPY-1

ACTUAL GROSS BILLING

SUB TOTAL

TOTAL RECONCILING ITEMS

NET DUE AMOUNT

HAVOICE

THE WASHINGTON THE INVOICE NUMBER LING ADDRESS WECT-TV ATLANTIC TELECASTING. CORP. P O BOX 4029-AZALEA STATION CHANNEL 6 47473801 7-31-84 WETFERSON MARKETING INC WILNINGTON. NORTH CAROLINA 28406 P 0 BCX 19807 919-791-8070 PATE PARO SILVE TO THE PARENT OF THE PARENT NC 27619 RALFIGH 00 JIRY 213 YES REPRESENTATIVE CONTRACT END DATE MAKE PAYMENT TO POL US SENATE REP REGIONAL ---ATLANTIC TELECASTING 8-05-84 P O BOX 4029-AZALEA STATION POTENTIAL TORN THE REPORT OF THE PROPERTY OF T THE TOME NUMBER V WILMINGTON NC 28406 HELMS FOR SENATE 474738 9999 740620 LACTUAL BROADCAST SCHEDULE RE ONCULATION 7-13 7-19 1 1 1 1 1 7-9AM 7-13 FR 30 813A HFS 811 7-16 NO 723A HFS-850-A 7-17 TU 30 822A HFS-850-A 30 7-18 WE 828A HFS-850-A 7-19 TH 30 813A HFS-850-A 7-13 7-19 4P-CC SW 7-15 SU 30 418P HFS 811 80 7-13 7-19 130P-CC BB 80 1 7-14 SA 30 332P HFS 811 7-13 7-19 1 11 1130-1230A 50 7-13 FR 30 1226A HFS 811 7-16 MO 30 1203A HFS-850-A 7-19 TH 30 1219A HFS-850-A 7-20 7-26 1 1 1 1 50 1130-1230A 7-23 MO 30 1136P HFS-850-A 7-24 TU 30 1213A HFS-850-A 7-25 WE 30 1229A N/C AIR INCORR DUE BASEBALL RAN OVER 50-7-26 TH 30 1229A HFS-850-A 7-20 7-26 80 1 2905, 80 1 7-22 SU AFR-1 REV. 2P-CC RC 30 613P 7-20 7-26 1 1 1 1 1 AFR-I AMERICAN FOR REA 7-9AM 7-20 FR 30 859A 45 129cx 7-23 MO HF S-850-A 30 716A 7-24 TU 30 828A HFS-850-A 7-25 WE 858A HFS-850-A 7-26 TH 30 722A HFS-850-A 7-20 7-26 300 1 7-25 WE 8P-CC BB 300 30 826P HFS-850-A MONTHLY COST CONFIRMATION 1,290.00 SUB-TOTAL ACTUAL GROSS BILLING 1.340.00 **SOCR** Wedgerrant that the agrical bypadcast reformation shown on this invoice was taken from the program log.

My Commission Extinct March 21, 1937 TOTAL RECONCILING ITEMS AGENCY COMMISSION 193.50 SOC R NET DUE AMOUNT 1.096.50 ORIGINAL COPY-1

**** ANYONE NUMBER SONTEMBER SERVICES AGENCY BILLING ADDRESS ATLANTIC TELECASTING. CORP. **HECT-TV** JEFFERSON MARKETING INC P O BOX 4029-AZALEA STATION CHANNEL 6 47475801 7-31-84 P 0 BOX 19807 WILMINGTON, NORTH CAROLINA 28406 919-791-8070 MATE CAND THE E MISADCAST MONTH SERS AGE REVIEW RALE IGH 27619 214 YES REPRESENTATIVE CONTRACT END DATE YELD WASHINGTON THE MAKE PAYMENT TO ATLANTIC TELECASTING REGIONAL POL U S SENATE-R REAGAN 7-29-84 P O BOX 4029-AZALEA STATION NOVE THE DRIVEN WERE WAS A STATE OF THE PROPERTY OF THE PROPER CONTRACTOR TO THE PROPERTY OF CONTRACT NUMBER WILMINGTON NC 28406 HELMS FOR SENATE HSE 9999 474758 740620 **ACTUAL BROADCAST** SCHEDULE RE: ONCILIATION COMMUNICATION OF THE PROPERTY 1,0 7-23 7-29 1 1 1 1 1 7-23 NO 7-9AM 813A AFR-1 REV 7-24 TU 30 714A AFR-1 REV 7-25 WE 30 821A AFR-1 REV 45 7-26 TH 30 714A AFR-1 REV 45 v 30+5 5 7-27 FR 714A AFR-1 REV 45 7-23 7-29 1 1 250 7-26 TH 30 AFR-1 REV 250 BP ADJ 558P 7-27 FR 559P 30 AFR-1 KEV 250 7-23 7-29 11 7-26 TH AFR-1/REV 1130P BRK 125 30 1129P 125 7-27 FR 30 1128P AFR-I REV 125 MONTHLY COST CONFIRMATION ... SUB-TOTAL ACTUAL GROSS BILLING 975-00 975-00 that the aculal broadcast information shown on this invoice was taken from the program log. TOTAL RECONCILING ITEMS AGENCY COMMISSION 146-25 NET DUE AMOUNT 828-75 ORIGINAL COPY-1

INVOICE

PO BOX 2068
WILMINGTON NC

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28402

JEFFERSON MARKETING IN BOX 19807 RALEIGH. NC

Kint mmuri

P.O. BOX 2068 • WILMINGTON, NORTH CAROLINA 28402 • 919/762-8581

REPRESENTATIVE	SALESPERSON
CHARLOTTE. NC	SELTEL.INC. CHAR
ADVERTISER	PRODUCT
REPUBLICAN SENATORIAL	HELMS FOR SENATE/KNOX

ORDER TYPE AGENCY ESTIMATE NO.

OR I G I NAL

CONTRACT NUMBER BROADCAST MONTH

INV& 6731-01 6/25-07/29/84

SCHEDULE DATES BILLING PERIOD

7/13-07/26/84 STANDARD

08/01/84

WWAY-TV

PAGE: 2

		SCHEDULE	ANY DISCR						BROADCAS	RT .			YS FROM DATE	
d m leul e l	e a levil		0477		DATES	DAVI	TIME				5475			
X X	X	BOOPM-1101PM WWOS SAT BP-CC BASEBAL	325.00 75.00 225.00	1 1	7/26	TH	926P 559P 839P	3(3(M/G FOR	HFS850-A HFS850-A AFR-1 HFS850-A	30.00 325.00 75.00 225.00	V 24, 2³	CREDIT	REMARKS
SCH	EDULE	COST FOR THIS BILLING PE	RIOD		ACTUAL				Y COMMISSI	ION PAYTHIS			OTALS	RECONCULATIO

WILMINGTON NC

BOX 19807

. RALEIGH. NC .

B JEFFERSON MARKETING (N

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WWAY-TV

08/01/84

PAGE: 1

ORDER TYPE AGENCY ESTIMATE NO.

28402

P.O. BOX 2068 • WILMINGTON, NORTH CAROLINA 28402 • 919/762-8581

REPRESENTATIVE SALESPERSON

CHARLOTTE , NC SELTEL , INC. CHAR
ADVERTISER PRODUCT

REPUBLICAN SENATORIAL HELMS FOR SENATE/KNOX

DRIGINAL	
CONTRACT NUMBER	BROADCAST MONTH
INV# 6731-01	6/25-07/29/84
SCHEDULE DATES	BILLING PERIOD
7/13-07/26/84	STANDARD

ANY DISCREPANCIES SHOULD BE REPORTED IMMEDIATELY

PAYMENT IS DUE 30 DAYS FROM DATE OF INVOICE.

ji		-	SCHEDULE							BROADCAS		1.5		ECONCILIATIO	
WITH		SA SL	TIME	RATE	NO.	DATES	DAY	TIME -	MAN AND	M/G FOR	PRODUCT/FILM	RATE	DEBIT	CREDIT	REMARK
	X		800PM-1101PM	225.00	1	7/13	FR	1045P	30		HFS-811	225.00			
	X		7A-9A	30.00	2	7/13	FR	750A	30		HFS-811	30.00		7	
						7/13	FR	853A	30		HFS-811	30.00			
XX	d		7A-9A	30.00	8	7/16	MO	711A	30		HF S850-A	30.00			
					3	7/16			30		HFS850-A	30.00			
					- 3	7/17	TU	744A	30		HFS850-A	30-00	4 1 - 1		
						7/17	TU	810A	30		HF\$850-A	30.00		A 17 - 1	1
						7/18	WE	810A	30		HF\$850-A	30.00			
						7/18	WE	849A	30		HFS850-A	30.00			
		·				7/19	TH	710A	30		HF\$850-A	30.00	ž.		
						7/19	TH	859A	30		HFS850-A	30.00			
		×	WWOS SAT	75.00	1	7/14	SA	459P	30		HFS-811	75-00			
		;	800PH-1101PM	250-00	1	7/15	SU							250-00	PREE
	1		800PM-1101PM	250.00	1	7/20	FR	834P	30	(AFR-1	250.00)		
	×		7A-9A	30-00	2	7/20	50	752A	30		AFR-1	30.00	1)10	423	
			10-70	30000	-	1/20			30		AFR-1	30.00			
x ,	K		7A-9A	30.00	8	7/23	MO	709A	30		HFS850-A	30.00			
						7/23			30		HFS850-A	30-00			
						7/24			30		HF\$850-A	30.00			
	1					7/24	TU	851A	30		HF\$850-A	30.00			
						7/25	WE	746A	30		HF\$850-A	30.00			
						7/25			30		HFS850-A	30.00			
						7/26	TH	714A	30		HFS850-A	30-00		12 14 1	
			E COST FOR THIS BILLING PE	RIOD : 1117		ACTUAL	G MOS	B BILLING	AGENC	r COMMISS	ION PAYTHIS	AMOUNT	Market T. K.	OFALS	пасондал
	-		a coo. For this made of			8 5	b	Þ O	5 0		9 8			A STATE OF THE STA	a francisco

WYAY-TV3
PO-BOX 2068
WILMINGTON NC

28402

JEFFERSON MARKETING (N

BOX 19807

RALEIGH, NC

each www.www.www.www.

WWAY-TV

08/01/84

PAGE: 1

P.O. BOX 2068 • WILMINGTON, NORTH CAROLINA 28402 • 919/762-8581

REPRESENTATIVE SALESPERSON

CHARLOTTE, NC SELTEL, INC. CHAR
ADVERTISER PRODUCT

REPUBLICAN SENATORIAL HELMS FOR SENATE

ORDER TYPE	AGENCY ESTIMATE NO.
REVISION-02	
CONTRACT NUMBER	BROADCAST MONTH
INV# 6652-02	6/25-07/29/84
SCHEDULE DATES	BILLING PERIOD
7/02-09/01/84	STANDARD

			SCHEDULE						ACTUAL	BROADCAS	RT .		-	ECONCILIATIO	
UWI	HF	SA SU	TIME	RATE	NO.	DATES	DAY	TIME	TYPE		PRODUCT/FILM	RATE	DEBIT	CREDIT	REMARK
						- 100									
4 4	~ ~		7A-9A	25.00	20	7/02		714A	30		HFS-101	25.00			
						7/03		859A	30		HFS-105	25-00		i i	
						7/04		747A	30	1	HFS-101	25.00			
						7/05		817A	30		HFS-105	25-00			
						7/06		659A	30		HFS-101	25.00			
						7/09		752A	30		HFS-101	25.00			
11						7/10		812A	30		HFS-105	25.00			
						7/11		711A	30		HFS-101	25-00			
						7/12		859A	30		HFS-105	25.00	FILE		
11						7/13		759A	30		HFS-101	25.00			
						7/16		850A	30		HFS-101	25-00			
						7/17	The state of the s	8594	30		HFS850-A	25.00			
11						7/18		746A	30		HFS-850A	25-00		,	
						7/19		850A	30		HES-850A	25.00	- wi		111.
	1					7/20		811A	30		AFR-D	25.00		-	160
1 1						7/23		852A	30		HF5-850A	25.00			, , , , ,
						7/25		709A	30		HFS-850A	25-00		17.	20
11						7/26		738A	30		HFS-850A	25.00		1.11. to	141
						7/27		852A	30		HFS-850A	25.00		Miste	I adu
11						7/24			1		1155 0504	25 20	25 25	2 25.00	TEC
П						7/27	FR	7114	30	7/24	HFS-850A	25.00	25.00	Mary	leed
	١,		11-1130P	80-00		7/06	ED	11319	30		HFS-101	80.00			
11	1	17	11-11-507	30000		100,000,000		1100P	30		HFS-105	80.00			
	33							1137P	30		HFS-101	80-00			
		1 3					'''	11311	1		NEWS RAN		COMPTS	EVENT	
11						7/14	SA	1059P	30		HF\$101	80-00	C SPURIS		
								1129P	30		AFR=1	80-00	7.23		
	200							1100P	30		AFR-1	80.00	7223		
								1059P	30		HES BOUN	80.00			
						and the second s	The second second	11119	30		HFS-850A	80.00			1-4
Ц	9C	HEDULE	COST FOR THIS BILLING	PERIOD		ACTUAL	ROSS	BILLING	AGENC	COMMISSI	ON PAYTHIS	AMOUNT	SUB-TO	OTALS	RECONCILIA
-, 10-				1.140.0	0	6 51	MAG	kod	6 0	181 400	6 0	969.00	25.00	25.00	

WWAY-TV3 PD 80X 2068 WILMINGTON NC

28402

JEFFERSON MARKETING IN BOX 19807 RALEIGH. NC

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P.O. BOX 2068 • WILMINGTON, NORTH CAROLINA 28402 • 919/762-8581

REPRESENTATIVE	SALESPERSON
CHARLOTTE. NC	SELTEL.INC. CHAR
ADVERTISER	PRODUCT
REPUBLICAN SENATORIAL	HELMS FOR SENATE/WOMEN

WWAY-TV

08/01/84

PAGE: 1

ORDER TYPE	AGENCY ESTIMATE NO.
ORIGINAL	
CONTRACT NUMBER	BROADCAST MONTH
INV# 6734-01	6/25-07/29/84
SCHEDULE DATES	BILLINGTERIOD
7/16-08/10/84	STANDARD

PAYMENT IS	DUE	30 DAYS	FROM	DATE	OF INVO	ICE

					SCH	EDULE		1					BROADCAS				RECONCILIATIO	N .
TU		TH	F 1	A SI	9	TIME	RATE	NQ.	DATES	DAY	TIME	MIN SEC	M/G FOR	PRODUCT/FILM	RATE	DEBIT	CREDIT	REMARK
	×		1		7P-7	30P	105-0	0/1	7/18	WE	722P	30		HF\$850-A	105-00			
×		x			7A-9	A	30.00	2	7/17		710A			HFS850-A	30.00 30.00			0
			1		1,			1	7/19		818A		(HFS850-A			}	
i				1	500	PM-0600PM	60.0	0 1	1/22	SU	5379	30		AFR-L	60.06	7 240	}	
X	X	X	3		1230	PM-0400PM	50.0	0 4	7/16		159P			HFS850-A	50-00			
					1		017	1	7/17		258P 1259P			HFS850-A	50.00 50.00			
							5. P 19		7/18		232P			HFS850-A	50.00			
	н						1	1								1.6	1	1
				X	HEE	HAW	90.0	4	7/21	SA	713P	30		AFR=1	90-00	7249		
	x			1	7P-7	30P —	105.00	1	7/25	WE	707P	30		HFS850-A	105.00			
X		x			1230	PM-0400PM	50.0	1	7/24	TU	332P	30		HFS850-A	50.00			
				1	L	,	1,	1	7/26	TH	134P	30		HF\$850-A	50.00	/	Politic	PLI
×	×	×	×		7A-9	A 4	30.0	0 5			745A			HF\$850-A	30.00	(plestice thang to	1. D.
							1	1:	7/24		710A			HFS850-A	30.00		- Large	man
							(M)		7/25		851A			HFS850-A	30.00		0	1 4
							21	1	1/26		859A 859A			HFS850-A	30.00 30.00			
					500	PH-0600PH	50.00	,	7/29	SII	532P	30		HF\$850-A	50-00			
							100		1		,,,,,,			3050 1	30000			1
							(0,						-					
-																		
	<u> </u>	Ц			F COST =	R THIS BILLING P	ERIOD S		ACTUAL	3000	L MILL LING	AGENC	COMMISSI	ON PAYTHIS	AMOUNT	SUB-	TOTALS	RECONCIL
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WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INMINES WAS THE PROS. THE

WWAY-TV 07/26/84 PAGE WWAY-TV3 MMU PO BOX 2068 WILMINGTON NC ORDER TYPE AGENCY ESTIMATE NO. DRIGINAL P.O. BOX 2068 • WILMINGTON, NORTH CAROLINA 28402 • 919/762-8581 28402 REPRESENTATIVE SALESPERSON CONTRACT NUMBER BROADCAST MONTH JEFFERSON MARKETING IN CHARLOTTE. NC THRU 07/22/84 SELTEL. INC. CHAR INV# 6843-02 BOX 19807 ADVERTISER PRODUCT SCHEDULE DATES BILLING PERIOD RALEIGH. NC REPUBLICAN SENATORIAL HELMS' FOR SEN/REAGAN 7/20-07/22/84 STANDARD ANY DISCREPANCIES SHOULD BE REPORTED IMMEDIATELY PAYMENT IS DUE 30 DAYS FROM DATE OF INVOICE. SCHEDULE **ACTUAL BROADCAST** RECONCILIATION HILL BEE MIG FOR PRODUCT/FILM RATE NO. DATES DAY TIME RATE DEBIT ... CREDIT ... REMARKS 7/20 FR 30 6P-630P 125-00 629P AFR-1 125-00 30 1200PH-0200PH 100-00 7/21 SA 1240P AFR-1 100-00 430PN-0500PM 40.00 7/21 SA 459P 30 AFR-1 40.00 X 100.00 7/22 SU 1139A 30 AFR-1 100.00 1100AM-0100PM 307P 30 230PH-0300PH 50-00 7/22 SU AFR-1 50-00 X SUN NEWS 7/22 50 125.00 125.00 30 AFR-1 Mary Weiden ACTUAL GROSS BILLING AGENCY COMMISSION PAY THIS AMOUNT **是这些现象的方式的运用的** 9 540.00 (1 5 U 82.00

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ORDER TYPE

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CONTRACT NUMBER

08/01/84

PAGE: 1

AGENCY ESTIMATE NO.

BROADCAST MONTH

P.O. BOX 2068 • WILMINGTON, NORTH CAROLINA 28402 • 919/762-8581

CHARLOTTE, NC

REPRESENTATIVE

ADVERTISER

SALESPERSON

SELTEL. INC. CHAR

PRODUCT

REPUBLICAN SENATORIAL HELMS FOR SEN/REAGAN

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SCHEDULE DATES	BILLING PERIOD

7/23-07/27/84 STANDARD

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BCHEDU	E COST FOR THIS BELLING PE	RIOD		ACTUAL	2ROSE	BILLING	AGENCY	COMMISSI	ON PAY THIS	AMOUNT	SU8-1	TOTALS	RECONCILIA

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

National Congressional Club R.E. Carter Wrenn, treasurer Helms for Senate Mark L. Stephens, treasurer

MUR 1748

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal
Election Commission, do hereby certify that on November 29,
1985, the Commission decided by a vote of 4-1 to take
the following actions in MUR 1748:

- 1. Authorize the Order and Subpoena with questions and request for documents as attached to the General Counsel's Report signed November 20, 1985, to be sent to Jefferson Marketing, Inc.
- Approve the cover letter attached to the General Counsel's Report signed November 20, 1985.

Commissioners Aikens, Harris, Josefiak and McGarry voted affirmatively for this decision; Commissioner Elliott dissented; Commissioner McDonald did not cast a vote.

Attest:

12-2-85

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00

Date

Marjorie W. Emmons

Secretary of the Commission

Received in Office of Commission Secretary: Mon., 11-25-85, 3:09 Circulated on 48 hour tally basis: Tues., 11-26-85, 4:00 Deadline for vote: Fri., 11-29-85, 4:00

SENSITIVE

BEFORE THE PEDERAL BLECTION COMISSION STORETARY

In the Matter of

National Congressional Club R.E. Carter Wrenn, treasurer Helms for Senate Mark L. Stephens, treasurer MUR 1768NOY 25 P3: 09

GENERAL COUNSEL'S REPORT

BACKGROUND

On September 4, 1985, the Federal Election Commission

("Commission") authorized the Office of General Counsel to send interrogatories and a request for documents to Jefferson

Marketing, Inc. ("JMI") as part of its investigation of the above-captioned matter. The questions and request for documents were related to the Commission's reason to believe determinations of November 27, 1984 and April 23, 1985, that the National Congressional Club ("NCC") and Carter Wrenn, as treasurer, and Helms for Senate ("HFS") and Mark L. Stephens, as treasurer, had each made and accepted excessive contributions through the production and broadcast of the "Americans for Reagan" ("AFR") television advertisement.

By letter dated September 27, 1985, counsel for JMI requested an extension until October 15, 1985 to respond to the Commission's questions and request for documents, due to difficulties in locating the documents necessary to prepare a response. JMI's request was granted. On October 15, 1985, the date JMI's response was due, counsel for JMI informed the Office of General Counsel that a response was not yet ready because it had been discovered that NCC had supplied the Commission with "inaccurate and incomplete" information in this matter. A written

-2request seeking an additional 30 days was received by the Office of General Counsel on October 15th. On October 29, 1985, the Commission granted JMI its requested extension of 30 days, thus giving them until the close of business on November 14, 1985, to respond to the Commission's questions and requests for documents. As of the date of this report, no response has been received from JMI. For reasons stated in the General Counsel's Reports dated August 14, 1985 and October 18, 1985, the Office of General Counsel recommends that the Commission issue a Subpoena to produce documents and an Order to submit written answers. The resolution of this MUR has already been significantly delayed by counsel repeatedly requesting extensions of time and then failing to supply the Commission with complete information. These tactics have required OGC to seek additional discovery in order to obtain the information necessary to complete the investigation of this matter. With regard to the present set of questions and requests for documents, this discovery was mailed to JMI on September 19, œ 1985, yet JMI was unable to answer nine questions and two requests for documents by November 14, 1985. With the extensions already granted to counsel, OGC believes there was sufficient time to respond to this relatively small discovery request. Additionally, counsel is now willing to admit that respondent NCC supplied the Commission with inaccurate and incomplete information. In order to assure the future receipt of

-3accurate and complete information, all of which is necessary to resolve this matter, and to prevent any further unneeded delays in obtaining this information, the Office of General Counsel believes that the issuance of a Subpoena and Order is warranted. RECOMMENDATIONS The Office of General Counsel recommends that the Commission: Marketing, Inc. 2. Approve the attached cover letter. 5 Charles N. Steele 2 General Counse 4 V 20,1985

Authorize the attached Order and Subpoena with questions and request for documents to be sent to Jefferson

Kenneth A.

Associate General Counsel

Attachments

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1. Order and Subpoena (1)

2. Letter (1)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
National Congressional Club) MUR 1748
Carter Wrenn, treasurer)
Helms for Senate)
Mark L. Stephens, treasurer)

SUBPORNA TO PRODUCE DOCUMENTS ORDER TO SUBMIT WRITTEN ANSWERS

To: Douglas Davidson, President Jefferson Marketing, Inc. 3825 Barrett Drive Raleigh, N.C. 27609

Pursuant to 2 U.S.C. § 437d(a)(1) and (3) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and Subpoenas you to produce requested documents.

Such answers must be submitted under oath and must be forwarded to the Commission within 10 days of your receipt of this Order/Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on _______, 1985.

John Warren McGarry Chairman

ATTEST:

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Majorie W. Emmons Secretary to the Commission

Attachment Questions

Jefferson Marketing, Inc. OUESTIONS TO AND REQUEST FOR DOCUMENTS FROM: Douglas Davidson, President DEFINITIONS The terms "and" and "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of this request any answers or documents which may be otherwise construed to be out of its scope. The term "person" includes an individual, partnership, committee, association, corporation, labor organization, or any other organization or group of persons. QUESTIONS In response to questions by the Federal Election Commission ("Commission"), R.E. Carter Wrenn, Executive Director of the National Congressional Club ("NCC") asserted that the Helms for Senate Committee ("HFS") paid \$1,938.63 for the production of a television advertisement entitled "Americans for Reagan" ("AFR") which was one-half of the production cost. Additionally, Mr. Wrenn asserted, in response to later questions from the Commission, that Jefferson Marketing, Inc., ("JMI") produced the AFR advertisement. 1(a) Did JMI produce the AFR advertisement? 1(b) Please specify in detail what JMI did to produce the AFR advertisement. 1(c) Were any other persons, organizations or entities involved in the production of the AFR advertisment? If the answer is yes, please identify who and specify what they did with regard to the production of the AFR ad. 5 1(d) Please state what portion of the \$1,938.63 paid by HFS is attributable to the actual expenses incurred by JMI C in producing the AFR advertisement. In an affidavit of Mr. Wrenn submitted to the Commission, Mr. Wrenn asserts that HFS's share of advertising for the AFR ad on North Carolina television stations was \$30,502.50, which was one-half of the total. Mr. Wrenn also asserts that HFS paid onehalf of the advertising of AFR on a South Carolina television station (which broadcast into North Carolina) amounting to \$125. Please supply the following information relating to the media time buy for the AFR advertisement. 2(a) Was JMI the media time buyer for the AFR advertisement. If not, please identify the media time buyer for the AFR advertisement.

payment for television media time purchased for the AFR ad from

television stations broadcasting in whole or part to a North

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Carolina audience.



WASHINGTON, D.C. 20463

Elliott Schulder, Esquire Covington & Burling 1201 Pennsylvania Avenue, N.W. P.O. Box 7566 Washington, D.C. 20044

RE: MUR 1748

Dear Mr. Schulder:

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The Federal Election Commission, on October 29, 1985, granted your client's request for an extension of time to respond to the Commission's interrogatories and request for documents. You were notified by letter that this response was due on November 14, 1985. The Commission has not received a response from your client.

As a result, on , 1985, the Commission issued the attached Subpoena and Order which require your client to provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, U.S. Code.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437(a)(12)(A) apply. That section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

It is required that you submit the information in response to this Subpoena and Order under oath and that you do so within ten (10) days of your receipt of this Subpoena and Order. If you

-2have any questions, please direct them to Eric Kleinfeld, the attorney handling this matter, at (202) 523-4000. Sincerely, Charles N. Steele General Counsel Kenneth A. Gross Associate General Counsel BY: Enclosure Subpoena and Order Questions Request for documents 0 C 0 00



WASHINGTON, D.C. 20463

November 4, 1985

Elliott Schulder, Esquire Covington & Burling 1201 Pennsylvania Ave., N.W. P.O. Box 7566 Washington, D.C. 20044

RE: MUR 1748

Dear Mr. Schulder:

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This is in reference to your letter dated October 15, 1985, requesting an extension until November 14, 1985 to respond to the Commission's questions and request for documents. After considering the circumstances presented in your letter, the Commission has determined to grant you your requested extension. Accordingly, your response will be due on November 14, 1985.

If you have any questions, please contact Eric Kleinfeld, the attorney assigned to this matter at (202) 523-4000.

Charles N. Steele

Remoth A Gross

Associate General Counsel



WASHINGTON, D.C. 20463

Elliott Schulder, Esquire Covington & Burling 1201 Pennsylvania Ave., N.W. P.O. Box 7566 Washington, D.C. 20044

RE: MUR 1748

Dear Mr. Schulder:

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C

This is in reference to your letter dated October 15, 1985, requesting an extension until November 14, 1985 to respond to the Commission's questions and request for documents. After considering the circumstances presented in your letter, the Commission has determined to grant you your requested extension. Accordingly, your response will be due on November 14, 1985.

If you have any questions, please contact Eric Kleinfeld, the attorney assigned to this matter at (202) 523-4000.

Charles N. Steele General Counsel

By: Kenneth A. Gross Associate General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
)
National Congressional Club
R.E. Carter Wrenn, treasurer)
Helms for Senate
Mark L. Stephens, treasurer)

CERTIFICATION

- I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of October 29, 1985, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1748:
 - 1. Grant Jefferson Marketing, Inc. its requested extension of 30 days, thus giving them until close of business on November 14, 1985, to respond to the Commission's questions and requests for documents.
 - Direct the Office of General Counsel to send a letter so informing Jefferson Marketing, Inc.

Commissioners Aikens, Elliott, Harris, Josefiak, McDonald, and McGarry voted affirmatively for the decision.

Attest:

10-29-85

Date

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Mayour W. Emmone

/ Marjorie W. Emmons Secretary of the Commission

*SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

National Congressional Club R.E. Carter Wrenn, treasurer Helms for Senate Mark L. Stephens, treasurer **MUR 1748**

OFFICE OF THE POPULATION OF TH

GENERAL COUNSEL'S REPORT

BACKGROUND

On September 4, 1985, the Federal Election Commission

("Commission") authorized the Office of General Counsel to send interrogatories and a request for documents to Jefferson

Marketing, Inc. ("JMI") as part of its investigation of the above-captioned matter. The questions and request for documents were related to the Commission's reason to believe determinations of November 27, 1984 and April 23, 1985, that the National Congressional Club ("NCC") and Carter Wrenn, as treasurer, and Helms for Senate ("HFS") and Mark L. Stephens, as treasurer, had each made and accepted excessive contributions through the production and broadcast of the "Americans for Reagan" ("AFR") television advertisement.

By letter dated September 27, 1985, counsel for JMI requested an extension until October 15, 1985 to respond to the Commission's questions and request for documents, due to difficulties in locating the documents necessary to prepare a response. JMI's request was granted. On October 15, 1985, the date JMI's response was due, counsel for JMI informed the Office of General Counsel that a response was not yet ready because it had been discovered that NCC had supplied the Commission with "inaccurate and incomplete" information in this matter. A written

-2request seeking an additional 30 days was received by the Office of General Counsel on October 15th. The Office of General Counsel recommends that the Commission decline counsel's requested extension and instead issue a Subpoena to produce documents and an Order to submit written answers. The resolution of this MUR has already been significantly delayed by counsel repeatedly requesting extensions of time and then failing to supply the Commission with complete information. These tactics have required OGC to seek additional discovery in order to obtain the information necessary to Q complete the investigation of this matter. With regard to the present set of questions and requests for documents, this discovery was mailed to JMI on September 19, 1985, yet JMI was unable to answer nine questions and two requests for documents by their due date on October 15, 1985. 0 With the extension already granted to counsel, OGC believes there was sufficient time to respond to this relatively small discovery request. Additionally, counsel is now willing to admit that 0 respondent NCC supplied the Commission with inaccurate and incomplete information, a matter which the Office of General Counsel previously recognized and discussed in its General Counsel's Report of August 14, 1985 and which prompted the current set of discovery requests. In order to assure the future receipt of accurate and complete information, all of which is necessary to resolve this matter, and to prevent any further unneeded delays in obtaining this information, the Office of

-3-General Counsel believes that the issuance of a Subpoena and Order is warranted. RECOMMENDATIONS The Office of General Counsel recommends that the Commission: Decline to grant Jefferson Marketing, Inc. its requested extension of 30 days to respond to the Commission's questions and request for documents. Authorize the attached Order and Subpoena with questions and request for documents to be sent to Jefferson Marketing, Inc. 3. Approve the attached cover letter. Charles N. Steele General Counsel tober 18, 1985 Gross Kenneth A. Associate General Counsel 0 Attachments 1. Request for extension 2 2. Order and Subpoena (1) 3. Letter (1) C 2 00

ATTACHMENT 1 0

COVINGTON & BURLING

IZOI PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

(202) 002-6202) 662-5462

WRITER'S DIRECT DIAL HUMBER

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TWX: 710 822-0005 (CB W8H)
TELEX: 89-583 (COVLING W8H)
TELECOPIER INFORMATION:
(202) 662-6280
CABLE: COVLING

October 15, 1985

K(811- (81)

BY HAND

Eric Kleinfeld, Esq. Federal Election Commission Seventh Floor 1325 K Street, N.W. Washington, D.C. 20463

Re: MUR 1748

Dear Mr. Kleinfeld:

On behalf of Jefferson Marketing, Inc. ("JMI") and Douglas Davidson, I am writing to request a further extension of time to and including November 14, 1985, in which to respond to the Commission's questions and request for documents in the above matter.

The additional time is needed because we have recently become aware, based on information obtained from JMI, that the responses previously submitted on behalf of the National Congressional Club ("NCC") in this matter are incomplete and inaccurate in certain respects. We are presently reviewing all of the available information for the purpose of amending and supplementing NCC's responses. We request the additional time in order to ensure that both NCC's amended and supplemental responses and JMI's response are as complete and accurate as possible. In addition, beginning on October 21, 1985, the undersigned, who has primary responsibility for preparing JMI's response and NCC's amended and supplemental responses, will be engaged in a trial in the U.S. District Court for the Eastern District of Virginia. The trial is expected to last approximately two weeks.

In view of these unusual circumstances, we request an extension of time to and including November 14, 1985.

Ellisa bewellen

Elliott Schulder

BEFORE THE PEDERAL ELECTION COMMISSION

In the Matter of	
National Congressional Club) Carter Wrenn, treasurer)	MUR 1748
Helms for Senate) Mark L. Stephens, treasurer)	

SUBPORNA TO PRODUCE DOCUMENTS ORDER TO SUBMIT WRITTEN ANSWERS

To: Douglas Davidson, President Jefferson Marketing, Inc. 3825 Barrett Drive Raleigh, N.C. 27609

Pursuant to 2 U.S.C. § 437d(a)(1) and (3) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and Subpoenas you to produce requested documents.

Such answers must be submitted under oath and must be forwarded to the Commission within 10 days of your receipt of this Order/Subpoena.

	WHEREFORE,	the	Chairman	of	the	Federal	Election	Commission	n
has	hereunto set	: his	s hand on				, 19	985.	

John Warren McGarry Chairman

ATTEST:

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Majorie W. Emmons Secretary to the Commission

Attachment Questions

-2-2(b) Please list all television stations broadcasting to a North Carolina audience from which media time was purchased for the AFR ad and the amount of media time purchased from each. 2(c) Of the \$30,627.50 allocated to HFS, what portion was paid or represents amounts paid, to the North and South Carolina television stations on which the ad was run? 2(d) If less than \$30,627.50 was paid to the North and South Carolina television stations on which the ad was run for HFS' share of the advertising time, please show what portion of the \$30,627.50, in a dollar amount, was actually paid for HFS' share of the advertising time. 2(e) Of the \$30,627.50 allocated to HFS, what portion, if any, is attributable to the commission charged by JMI? Please show this figure in a dollar amount. REQUEST FOR DOCUMENTS Please submit copies of all purchase orders or other evidence of agreement with which media time was purchased for the AFR advertisement from television stations broadcasting in whole or part to a North Carolina audience. Please submit copies of all checks or other evidence of payment for television media time purchased for the AFR ad from television stations broadcasting in whole or part to a North Carolina audience. 0



WASHINGTON, D.C. 20463

Elliott Schulder, Esquire Covington & Burling 1201 Pennsylvania Avenue, N.W. P.O. Box 7566 Washington, D.C. 20044

RE: MUR 1748

Dear Mr. Schulder:

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This is in reference to your letter dated October 15, 1985, requesting an extension of 30 days to respond to the Commission's interrogatories and request for documents. In considering the circumstances of this matter, the Commission on , 1985, declined to grant you your requested extension.

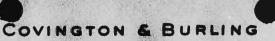
Instead, the Commission had issued the attached Subpoena and Order which require your client to provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, U.S. Code.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437(a)(12)(A) apply. That section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

It is required that you submit the information in response to this Subpoena and Order under oath and that you do so within ten (10) days of your receipt of this Subpoena and Order. If you

-2have any questions, please direct them to Eric Kleinfeld, the attorney handling this matter, at (202) 523-4000. Sincerely, Charles N. Steele General Counsel BY: Kenneth A. Gross
Associate General Counsel Enclosure Subpoena and Order Questions Request for documents 3 œ 0 2 C 5 00

TWX: 710 822-0005 (ca wast)



1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

TELEPHONE (202) 662-5462

WRITER'S DIRECT DIAL NUMBER

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TELEW 89-593 (COVLING WSH)

TELECOPIER INFORMATION:
(202) 668-6380
CABLE: COVLING

October 15, 1985

BY HAND

Eric Kleinfeld, Esq. Federal Election Commission Seventh Floor 1325 K Street, N.W. Washington, D.C. 20463

Re: MUR 1748

Dear Mr. Kleinfeld:

On behalf of Jefferson Marketing, Inc. ("JMI") and Douglas Davidson, I am writing to request a further extension of time to and including November 14, 1985, in which to respond to the Commission's questions and request for documents in the above matter.

The additional time is needed because we have recently become aware, based on information obtained from JMI, that the responses previously submitted on behalf of the National Congressional Club ("NCC") in this matter are incomplete and inaccurate in certain respects. are presently reviewing all of the available information for the purpose of amending and supplementing NCC's responses. We request the additional time in order to ensure that both NCC's amended and supplemental responses and JMI's response are as complete and accurate as In addition, beginning on October 21, 1985, the undersigned, who has primary responsibility for preparing JMI's response and NCC's amended and supplemental responses, will be engaged in a trial in the U.S. District Court for the Eastern District of Virginia. The trial is expected to last approximately two weeks.

In view of these unusual circumstances, we request an extension of time to and including November 14, 1985.

Sincerely,

Elliott Schulder

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 2, 1985

Elliott Schulder, Esq.
Covington & Burling
1201 Pennsylvania Ave., N.W.
P.O. Box 7566
Washington, D.C. 20044

Re: MUR 1748

Dear Mr. Schulder:

This is in reference to your letter dated September 27, 1985, requesting an extension of 20 days to respond to the Commission's questions and request for documents. After considering the circumstances presented in your letter, the Commission has determined to grant your requested extension. Accordingly, your response will be due on October 15, 1985.

If you have any questions, please contact Eric Kleinfeld, the attorney assigned to this matter at (202) 523-4000.

Sincerely,

Charles N. Steele General Counsel

By: Kenneth A. Gross

Associate Géneral Counsel



WASHINGTON, D.C. 20463

Elliott Schulder, Esq.
Covington & Burling
1201 Pennsylvania Ave., N.W.
P.O. Box 7566
Washington, D.C. 20044

Re: MUR 1748

Dear Mr. Schulder:

This is in reference to your letter dated September 27, 1985, requesting an extension of 20 days to respond to the Commission's questions and request for documents. After considering the circumstances presented in your letter, the Commission has determined to grant your requested extension. Accordingly, your response will be due on October 15, 1985.

If you have any questions, please contact Eric Kleinfeld, the attorney assigned to this matter at (202) 523-4000.

Sincerely,

Charles N. Steele General Counsel

By: Kenneth A. Gross
Associate General Counsel

1000 7050 COVINGTON & BURLING 1201 PENNSYLVANIA AVENUE, N. W. P. O. BOX 7566 WASHINGTON, D. C. 20044 TWX: 710 822-0005 (CS WSH) TELEPHONE (202) 662-6000 TELEX: 88-583 (COVLING WSH) TELECOMER INFORMATION WRITER'S DIRECT DIAL NUMBER (202) 662-6280 CABLE: COVLING September 27, 1985 Kenneth A. Gross, Esq. Associate General Counsel Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463 Re: MUR 1748 Dear Mr. Gross: I am writing on behalf of my clients, Jefferson Marketing Inc. and Douglas Davidson, who received a letter enclosing the Commission's questions and request for documents in the above matter on September 23, 1985. The Commission requested a response from Jefferson within ten days of receipt of the letter. Jefferson requests an additional ten days in which to respond because of problems encountered in locating certain documents necessary to prepare complete responses to the Commission's request. Sincerely, C 9 Elliott Schulder 0 tlm

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

TELEPHONE (202) 662-6000

WRITER'S DIRECT DIAL NUMBER

TWX: 710 822-0005 (CB WSH)
TELEX: 80-583 (COVLING WSH)
TELECOPIER INFORMATION:
(202) 662-6280
CABLE: COVLING

September 27, 1985

Kenneth A. Gross, Esq. Associate General Counsel Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463

Re: MUR 1748

Dear Mr. Gross:

I am writing on behalf of my clients, Jefferson Marketing Inc. and Douglas Davidson, who received a letter enclosing the Commission's questions and request for documents in the above matter on September 23, 1985. The Commission requested a response from Jefferson within ten days of receipt of the letter. Jefferson requests an additional ten days in which to respond because of problems encountered in locating certain documents necessary to prepare complete responses to the Commission's request.

Sincerely,

Elliott Schulder

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COVINGTON & BURLING DI PENNSTEVANIA AVENUEIN W

PIO BCX 1566 WASHINGTON D G 20044

> Kenneth A. Gross, Esq. Associate General Counsel Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463



WASHINGTON, D.C. 20463

September 19, 1985

Douglas Davidson, President Jefferson Marketing, Inc. 3825 Barrett Drive Raleigh, North Carolina 27609

RE: MUR 1748

Dear Mr. Davidson:

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The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, Internal Revenue Code of 1954. In order to assist an investigation currently being conducted, the Commission requests that you supply certain information in response to the attached questions and request for documents.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. \$ 437q(a)(12)(A) apply. That section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

You may consult with an attorney and have an attorney assist you in the preparation of your responses. However, the Commission requests that you submit the information within ten days of your receipt of this letter.

If you have any questions, please direct them to Eric Kleinfeld, the attorney staff member handling this matter, at (202) 523-4000. Sincerely, Charles N. Steel General Gouncel BY: Associate General Counsel Enclosure Questions Request for documents ব 0 ~ C 3 C 2 00

QUESTIONS TO AND REQUEST FOR Jefferson Marketing, Inc. DOCUMENTS FROM: Douglas Davidson, President DEFINITIONS The terms "and" and "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of this request any answers or documents which may be otherwise construed to be out of its scope. The term "person" includes an individual, partnership, committee, association, corporation, labor organization, or any other organization or group of persons. OURSTICES In response to questions by the Federal Election Commission ("Commission"), R.E. Carter Wrenn, Executive Director of the National Congressional Club ("NCC") asserted that the Helms for Senate Committee ("HFS") paid \$1,938.63 for the production of a television advertisement entitled "Americans for Reagan" ("AFR") which was one-half of the production cost. Additionally, Mr. Wrenn asserted, in response to later questions from the Commission, that Jefferson Marketing, Inc., ("JMI") produced the AFR advertisement. 1(a) Did JMI produce the AFR advertisement? 1(b) Please specify in detail what JMI did to produce the AFR advertisement. 1(c) Were any other persons, organizations or entities involved in the production of the AFR advertisment? If the answer is yes, please identify who and specify what they did with regard to the production of the AFR ad. 2 1(d) Please state what portion of the \$1,938.63 paid by HFS is attributable to the actual expenses incurred by JMI 00 in producing the AFR advertisement. In an affidavit of Mr. Wrenn submitted to the Commission, Mr. Wrenn asserts that HFS's share of advertising for the AFR ad on North Carolina television stations was \$30,502.50, which was one-half of the total. Mr. Wrenn also asserts that HFS paid onehalf of the advertising of AFR on a South Carolina television station (which broadcast into North Carolina) amounting to \$125. Please supply the following information relating to the media time buy for the AFR advertisement. 2(a) Was JMI the media time buyer for the AFR advertisement. If not, please identify the media time buyer for the AFR advertisement.



WASHINGTON, D.C. 20463

Douglas Davidson, President Jefferson Marketing, Inc. 3825 Barrett Drive Raleigh, North Carolina 27609

EX 1/19

RE: MUR 1748

Dear Mr. Davidson:

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The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, Internal Revenue Code of 1954. In order to assist an investigation currently being conducted, the Commission requests that you supply certain information in response to the attached questions and request for documents.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. That section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

You may consult with an attorney and have an attorney assist you in the preparation of your responses. However, the Commission requests that you submit the information within ten days of your receipt of this letter.

-2-If you have any questions, please direct them to Eric Kleinfeld, the attorney staff member handling this matter, at (202) 523-4000. Sincerely, Charles N. Steele General Counsel BY: Kenneth A. Gross Associate General Counsel Enclosure Questions Request for documents 'A 0 C 0 a

BEFORE THE FEDERAL ELECTION COMMISSION In the Matter of National Congressional Club R.E. Carter Wrenn, as treasurer MUR 1748 Helms for Senate Mark L. Stephens, treasurer CERTIFICATION I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of 9 September 4, 1985, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1748: Reject the General Counsel's recommendation to issue a subpoena. Direct the General Counsel to seek through 2. 0 interrogatories to Jefferson Marketing, Inc. the answers to the specific questions found on pages 2 and 3 of attachment #1 to the General Counsel's report dated August 14, 1985, subject to the following changes: deletion of questions le, 1f, 2e, 2f, a) and 2 g. expansion of question 2d as agreed in b) the meeting. (continued)

Federal Election Commission Certification for MUR 1748 September 4, 1985

3. Direct the staff to send appropriate letters.

Commissioners Aikens, Elliott, Harris, Josefiak, McDonald, and McGarry voted affirmatively for the decision.

Attest:

9-5-85

Date

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Marjerie W. Emmons

Marjorie W. Emmons Secretary of the Commission

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of		္သာ	8
National Congressional Club) R.E. Carter Wrenn, treasurer) Helms for Senate)	MUR 1748	1 S.6V	SSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSS
Mark L. Stephens, treasurer)		SI	22 T
GENERAL COUNSEL'S REPOR	T	2	Shirt

BACKGROUND

On June 19, 1985, the Federal Election Commission

("Commission") authorized an Order to submit written answers and
a Subpoena to produce requested documents to be sent to the
National Congressional Club ("NCC") and R.E. Carter Wrenn, as
treasurer. The questions and request for documents were related
to the Commission's reason to believe determinations of November
27, 1984 and April 23, 1985, that NCC (and Carter Wrenn, as
treasurer) and Helms for Senate ("HFS") (and Mark L. Stephens, as
treasurer) had each made and accepted excessive contributions
through the production and broadcast of the "Americans for
Reagan" ("AFR") television advertisement.

A response to the Commission's questions and request for documents was received on July 18, 1985 from NCC and Carter Wrenn. NCC failed to produce any of the requested documents and did not provide much of the information asked for in the questions. Both the information provided and NCC's claims, in its response, not to know or have in its possession certain information, contradict the evidence previously produced in this matter. For example, NCC has maintained throughout the course of this MUR that it (NCC) produced the AFR ad and then, after it did

-2so, allocated one-half of its production cost to HFS. However, the explanation is somewhat different in response to the Commission's latest questions. When asked to specify what NCC did to produce the ad, Carter Wrenn answers that NCC merely paid one-half of the ad's production costs to Jefferson Marketing, Inc. ("JMI"). Wrenn states that JMI actually produced the ad. This clearly contradicts respondent's earlier statements that (1) the ad itself was produced by NCC and (2) the decision to allocate one-half of its cost was made after the ad was produced. If the latter were true, it would seem likely that NCC would have paid the entire production cost and then sought reimbursement from HFS for one-half once the decision to allocate was made. NCC has repeatedly misled the Commission during the investigation, not only as to what its actual role was with regard to the AFR ad, but also as to what facts are within its and Mr. Wrenn's knowledge. Mr. Wrenn, as treasurer of NCC, repeatedly asserted knowledge as to amounts paid by HFS for the ad's production and broadcast, yet when asked to elaborate on Œ these figures, NCC claims to have no further knowledge. When asked to submit to the Commission the cancelled checks used to pay for the AFR's ads broadcast time, NCC claims not to have any in its possession. NCC and Carter Wrenn have consistently led the Office of General Counsel to believe that it had the information and evidence concerning the AFR ad which OGC needed to investigate this matter. However, it appears as a result of the Commission's

-3latest Order and Subpoena, the information should be sought from JMI, as the producer and time buyer for the ad. The information requested is essential for the Office of General Counsel to adequately investigate the extent and nature of the violations at issue and is necessary to enable this office to make future dispositive recommendations to the Commission on the legal and factual issues of the case. Therefore, the Office of General Counsel recommends that the Commission approve the attached Order and Subpoena with questions and request for documents (which are substantially similar to the ones sent to NCC) to be sent to 0 Jefferson Marketing, Inc. RECOMMENDATIONS The Office of General Counsel recommends that the Commission: Authorize the attached Order and Subpoena with 0 questions and request for documents to be sent to Jefferson Marketing, Inc. 0 Approve the attached cover letter. a Charles N. Steele General Coursel Cugust 14,1985 BY: Gross Associate General Counsel Attachments Order and Subpoena (1) Letter (1)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

National Congressional Club) MUR 1748

Carter Wrenn, treasurer)

Helms for Senate)

Mark L. Stephens, treasurer)

SUBPORNA TO PRODUCE DOCUMENTS ORDER TO SUBMIT WRITTEN ANSWERS

To: Douglas Davidson, President Jefferson Marketing, Inc. 3825 Barrett Drive Raleigh, N.C. 27609

Pursuant to 2 U.S.C. § 437d(a)(1) and (3) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and Subpoenas you to produce requested documents.

Such answers must be submitted under oath and must be forwarded to the Commission within 10 days of your receipt of this Order/Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on _______, 1985.

John Warren McGarry Chairman

ATTEST:

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Marjorie W. Emmons Secretary to the Commission

Attachment Questions

SUBPOENA AND ORDER TO:

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Jefferson Marketing, Inc. Douglas Davidson, President

DEFINITIONS

- 1. The terms "and" and "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of this request any answers or documents which may be otherwise construed to be out of its scope.
- 2. The term "person" includes an individual, partnership, committee, association, corporation, labor organization, or any other organization or group of persons.

QUESTIONS

- 1. In response to questions by the Federal Election Commission ("Commission"), R.E. Carter Wrenn, Executive Director of the National Congressional Club ("NCC") asserted that the Helms for Senate Committee ("HFS") paid \$1,938.63 for the production of a television advertisement entitled "Americans for Reagan" ("AFR") which was one-half of the production cost. Additionally, Mr. Wrenn asserted, in response to later questions from the Commission, that Jefferson Marketing, Inc., ("JMI") produced the AFR advertisement.
 - 1(a) Did JMI produce the AFR advertisement?
 - 1(b) Please specify in detail what JMI did to produce the AFR advertisement.
 - 1(c) Were any other persons, organizations or entities involved in the production of the AFR advertisment? If the answer is yes, please identify who and specify what they did with regard to the production of the AFR ad.
 - 1(d) Please state what portion of the \$1,938.63 paid by HFS is attributable to the actual expenses incurred by JMI in producing the AFR advertisement.
 - 1(e) Please state what portion, if any, of the \$1,938.63
 paid by HFS is attributable to overhead incurred by JMI
 in producing the AFR advertisement.
 - 1(f) Please state what portion, if any, of the \$1,938.63 paid by HFS represents a profit charged by JMI to HFS for production of the advertisement.
- 2. In an affidavit of Mr. Wrenn submitted to the Commission, Mr. Wrenn asserts that HFS's share of advertising for the AFR ad on North Carolina television stations was \$30,502.50, which was

-2one-half of the total. Mr. Wrenn also asserts that HFS paid onehalf of the advertising of AFR on a South Carolina television station (which broadcast into North Carolina) amounting to \$125. Please supply the following information relating to the media time buy for the AFR advertisement. 2(a) Was JMI the media time buyer for the AFR advertisement. If not, please identify the media time buyer for the AFR advertisement. 2(b) Of the \$30,627.50 allocated to HFS, what portion was paid or represents amounts paid, to the North and South Carolina television stations on which the ad was run? 2(c) If less than \$30,627.50 was paid to the North and South Carolina television stations on which the ad was run for HFS' share of the advertising time, please show what portion of the \$30,627.50, in a dollar amount, was actually paid for HFS' share of the advertising time. 2(d) Of the \$30,627.50 allocated to HFS, what portion, if any, is attributable to the commission charged by JMI? Please show this figure in a dollar amount. 2(e) Of the \$30,627.50 allocated to HFS, what portion, if any, is attributable to the overhead incurred by JMI and the costs of providing the media buy for the AFR ad? Please show this figure in a dollar amount. 2(f) Of the \$30,627.50 allocated to HFS, what portion, if any, represents the profit earned by JMI for the time buying service for the AFR ad? Please show this figure in a dollar amount. 9 2(g) If the answer to 2(c) indicates that a profit was realized on the media time buying service for the AFR Œ advertisement, please explain how the amount to be charged to HFS as profit was finally determined and who made this determination. REQUEST FOR DOCUMENTS Please submit copies of all purchase orders or other evidence of agreement with which media time was purchased for the AFR advertisement from television stations broadcasting in whole or part to a North Carolina audience. Please submit copies of all checks or other evidence of payment for television media time purchased for the AFR ad from television stations broadcasting in whole or part to a North Carolina audience.



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FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

Douglas Davidson, President Jefferson Marketing, Inc. 3825 Barrett Drive Raleigh, North Carolina 27609

RE: MUR 1748

Dear Mr. Davidson:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached order which requires you to provide certain information has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a) (12) (A) apply. That section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this subpoena and order. However, you are required to submit the information under oath within ten days of your receipt of this subpoena and order.

If you have any questions, please direct them to Eric Kleinfeld, the attorney staff member handling this matter, at (202) 523-4000. Sincerely, Charles N. Steele General Counsel Kenneth A. Gross Associate General Counsel BY: Enclosure Subpoena & Order Questions 10 0 LA A

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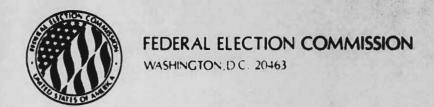
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CCC# 8038 Kleinfeld COVINGTON & BURLING 1201 PENNSYLVANIA AVENUE, N. W. P. O. BOX 7566 WASHINGTON, D. C. 20044 TWX: 710 822-0005 (CB WSH) TELEPHONE TELEX: 89-893 (COVLING WSH) (202) 662-6000 TELECOPIER INFORMATION: WRITER'S DIRECT DIAL NUMBER (202) 662-6280 CABLE: COVLING (202) 662-5462 July 18, 1985 BY HAND Kenneth A. Gross, Esq. Associate General Counsel Federal Election Commission 0 Seventh Floor 1325 K Street, N.W. C Washington, D.C. 20463 10 MUR 1748 Re: Dear Mr. Gross: 0 Enclosed for filing are the original and three copies of the responses of the National Congressional Club to the Commission's questions and request for documents dated June 25, 0 1985, in the above matter. 3 Please have the fourth copy date-stamped and returned C by our messenger. 9 Sincerely, C Elliott Schulder Enclosures

- 2 -Virginia. Audiofonics of Raleigh, North Carolina, modified the disclaimer for airing the advertisement outside North Carolina. 1.c. Please state what portion of the \$1,938.63 paid by HFS is attributable to the actual expenses incurred by NCC in producing the AFR advertisement. None. See answer to 1.a. 1.d. Please state what portion, if any, of the \$1,938.63 paid by HFS is attributable to overhead incurred by NCC in producing the AFR advertisement. None. See answer to 1.a. 1.e. Please state what portion, if any, of the \$1,938.63 paid by HFS represents a profit charged by NCC 9 to HFS for production of the advertisement. None. See answer to 1.a. 20 In the affidavit of Mr. Wrenn dated September 10, T 1984, and submitted in response to the Commission's reason to believe determinations, Mr. Wrenn asserts that HFS' share of 0 advertising for the AFR ad on North Carolina television stations was \$30,502.50, which was one-half of the total. Mr. Wrenn also asserts that HFS paid one-half of the 0 advertising of AFR on a South Carolina television station (which broadcast into North Carolina) amounting to \$125. 2.a. Of the \$30,627.50 allocated to HFS, what C portion was paid or represents amounts paid, to the North 0 and South Carolina television stations on which the ad was run? 00 All of the \$30,627.50 represents amounts paid to the North and South Carolina television stations, with the exception of the commission earned by the media time buyer. 2.b. Of the \$30,627.50 allocated to HFS, what portion, if any, is attributable to the overhead of the media time buyer and the costs of providing the media buy for the AFR ad? NCC understands that the media time buyer retained a 15% commission. NCC has no knowledge of the "overhead" or "costs of providing the media buy" for the media time buyer.

BEFORE THE FEDERAL ELECTION COMMISSION In the Matter of MUR 1748 THE NATIONAL CONGRESSIONAL CLUB This is the response of the National Congressional Club to the Federal Election Commission's questions and request for documents dated June 25, 1985, in the above matter. The undersigned, R.E. Carter Wrenn, is Executive Director of NCC and has personal knowledge of the matters discussed herein. RESPONSE TO QUESTIONS In the National Congressional Club's ("NCC") response to the Federal Election Commission's ("Commission") questions, dated January 7, 1985, R.E. Carter Wrenn, Executive Director of NCC, asserts that Helms for Senate ("HFS") paid \$1,938.63 for the production of the Americans for Reagan ("AFR") television advertisement, which was one-half of the initial production cost. 1.a. Please specify in detail what NCC did to produce the advertisement. NCC paid \$1,938.63 to Jefferson Marketing, Inc., which produced the advertisement. 1.b. Were any other persons, organizations or entities involved in the production of the AFR advertisement? If the answer is yes, please identify who and specify what they did with regard to the production of the AFR ad. Jefferson Marketing, Inc. produced the advertisement, subcontracting the editing to Cinema Sound of Arlington,

- 2 -Virginia. Audiofonics of Raleigh, North Carolina, modified the disclaimer for airing the advertisement outside North Carolina. 1.c. Please state what portion of the \$1,938.63 paid by HFS is attributable to the actual expenses incurred by NCC in producing the AFR advertisement. See answer to 1.a. None. 1.d. Please state what portion, if any, of the \$1,938.63 paid by HFS is attributable to overhead incurred by NCC in producing the AFR advertisement. None. See answer to 1.a. 1.e. Please state what portion, if any, of the \$1,938.63 paid by HFS represents a profit charged by NCC to HFS for production of the advertisement. None. See answer to 1.a. In the affidavit of Mr. Wrenn dated September 10, 1984, and submitted in response to the Commission's reason to 0 believe determinations, Mr. Wrenn asserts that HFS' share of advertising for the AFR ad on North Carolina television stations was \$30,502.50, which was one-half of the total. Mr. Wrenn also asserts that HFS paid one-half of the 0 advertising of AFR on a South Carolina television station (which broadcast into North Carolina) amounting to \$125. C 2.a. Of the \$30,627.50 allocated to HFS, what portion was paid or represents amounts paid, to the North 2 and South Carolina television stations on which the ad was run? ∞ All of the \$30,627.50 represents amounts paid to the North and South Carolina television stations, with the exception of the commission earned by the media time buyer. 2.b. Of the \$30,627.50 allocated to HFS, what portion, if any, is attributable to the overhead of the media time buyer and the costs of providing the media buy for the AFR ad? NCC understands that the media time buyer retained a 15% commission. NCC has no knowledge of the "overhead" or "costs of providing the media buy" for the media time buyer.



June 27, 1985

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Elliott Schulder, Esquire Covington and Burling 1201 Pennsylvania Avenue, N.W. P.O. Box 7566 Washington, D.C. 20044

RE: MUR 1748
National Congressional Club and
Carter Wrenn, as treasurer

Dear Mr. Schulder:

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On April 25, 1985, you were notified that the Commission found reason to believe that your clients violated 2 U.S.C. § 434 and § 441a of the Federal Election Campaign Act of 1971, as amended. The Commission has considered your May 22, 1985 request for procedural relief and on June 19, 1985, declined to consolidate MUR 1748 and MUR 1792.

An investigation of MUR 1748 is being conducted and it has been determined that additional information from your clients is necessary. Consequently, the Commission has issued the attached subpoena and order which requires your clients to provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, U.S. Code.

It is required that the information be submitted under oath and within ten (10) days of your receipt of this subpoena and order.

Elliott Schulder, Esquire Page 2 If you have any questions, please direct them to Eric Kleinfeld, the attorney handling this matter, at (202) 523-4000. Sincerely, Charles N. Steele General Counsel BY: Associate General Counsel Enclosures Subpoena and Order Questions 0 M C 0 α

Subpoena and Order to: National Congressional Club Definitions The terms "and" and "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of this request any answers or documents which may be otherwise construed to be out of its scope. The term "person" includes an individual, partnership, committee, association, corporation, labor organization, or any other organization or group of persons. OUESTIONS In the National Congressional Club's ("NCC") response to the Federal Election Commission's ("Commission") questions, dated January 7, 1985, R.E. Carter Wrenn, Executive Director of NCC, asserts that Helms for Senate ("HFS") paid \$1,938.63 for the production of the Americans for Reagan ("AFR") television advertisement, which was one-half of the initial production cost. 10 1(a) Please specify in detail what NCC did to produce the AFR advertisement. 1(b) Were any other persons, organizations or entities involved in the production of the AFR advertisment? If the answer is yes, please identify who and specify what they did with regard to the production of the AFR ad. 1(c) Please state what portion of the \$1,938.63 paid by HFS is attributable to the actual expenses incurred by NCC in producing the AFR advertisement. 1(d) Please state what portion, if any, of the \$1,938.63 paid by HFS is attributable to overhead incurred by NCC in producing the AFR advertisement. 2 1(e) Please state what portion, if any, of the \$1,938.63 00 paid by HFS represents a profit charged by NCC to HFS for production of the advertisement. In the affidavit of Mr. Wrenn dated September 10, 1984, and 2. submitted in response to the Commission's reason to believe determinations, Mr. Wrenn asserts that HFS's share of advertising for the AFR ad on North Carolina television stations was \$30,502.50, which was one-half of the total. Mr. Wrenn also asserts that HFS paid one-half of the advertising of AFR on a South Carolina television station (which broadcast into North Carolina) amounting to \$125. 2(a) Of the \$30,627.50 allocated to HFS, what portion was paid or represents amounts paid, to the North and South Carolina television stations on which the ad was run?

Questions Page 2 2(b) Of the \$30,627.50 allocated to HFS, what portion, if any, is attributable to the overhead of the media time buyer and the costs of providing the media buy for the AFR ad? 2(c) Of the \$30,627.50 allocated to HFS, what portion, if any, represents the profit charged by the media time buyer for the time buying service for the AFR ad? 2(d) If the answer to 2(c) indicates that a profit was realized on the media time buying service for the AFR advertisement, please explain how the amount to be charged to HFS as profit was finally determined and who made this determination. 0 α

REQUEST FOR DOCUMENTS

- 1. Please submit copies of all purchase orders or other evidence of agreement with which media time was purchased for the AFR advertisement from television stations broadcasting in whole or part to a North Carolina audience.
- 2. Please submit copies of all checks or other evidence of payment for television media time purchased for the AFR ad from television stations broadcasting in whole or part to a North Carolina audience.

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BEFORE THE FEDERAL ELECTION COMMISSION In the Matter of National Congressional Club Carter Wrenn, treasurer Helms for Senate Mark L. Stephens, treasurer

SUBPOENA TO PRODUCE DOCUMENTS ORDER TO SUBMIT WRITTEN ANSWERS

Pursuant to 2 U.S.C. § 437d(a)(1) and (3) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and Subpoenas you to produce requested documents.

Such answers must be submitted under oath and must be forwarded to the Commission within 10 days of your receipt of this Order/Subpoena.

wherefore, the Chairman of the Federal Election Commission has hereunto set his hand on Quee 25, 1973.

Jo n Warren McGarry

Chairman

ATTEST:

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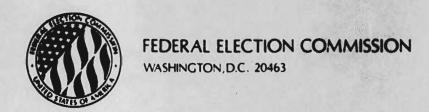
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Marjorie W. Emmons

Secretary to the Commission

Attachment Ouestions



CERTIFIED MAIL RETURN RECEIPT REQUESTED

Elliott Schulder, Esquire
Covington and Burling
1201 Pennsylvania Avenue, N.W.
P.O. Box 7566
Washington, D.C. 20044

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RE: MUR 1748
National Congressional Club and
Carter Wrenn, as treasurer

Dear Mr. Schulder:

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On April 25, 1985, you were notified that the Commission found reason to believe that your clients violated 2 U.S.C. \$ 434 and \$ 441a of the Federal Election Campaign Act of 1971, as amended. The Commission has considered your May 22, 1985 request for procedural relief and on , 1985, declined to consolidate MUR 1748 and MUR 1792.

An investigation of MUR 1748 is being conducted and it has been determined that additional information from your clients is necessary. Consequently, the Commission has issued the attached subpoena and order which requires your clients to provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, U.S. Code.

It is required that the information be submitted under oath and within ten (10) days of your receipt of this subpoena and order.

Elliott Schulder, Esquire Page 2 If you have any questions, please direct them to Eric Kleinfeld, the attorney handling this matter, at (202) 523-4000. Sincerely, Charles N. Steele General Counsel BY: Kenneth A. Gross Associate General Counsel Enclosures Subpoena and Order 0 Questions 0 m C 2 0

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	
National Congressional Club) Carter Wrenn, treasurer)	MUR 1748
Helms for Senate)	
Mark L. Stephens, treasurer)	

CERTIFICATION

I, Mary W. Dove, Administrative Assistant for the Federal Election Commission, do hereby certify that on June 19, 1985, the Commission decided by a vote of 4-1 to take the following actions in MUR 1748:

- 1. Decline to consolidate MURs 1748 and 1792.
- 2. Authorize the Order and Subpoena with questions and request for documents to be sent to the National Congressional Club and Carter Wrenn, as treasurer, as attached to the General Counsel's Report signed June 14, 1985.
- Approve the cover letter attached to the General Counsel's Report signed June 14, 1985.

Commissioners Harris, McDonald, McGarry, and Reiche voted affirmatively in this matter. Commissioner Elliott dissented. Commissioner Aikens did not cast a vote.

Attest:

Date

6-19-85

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Mary W Dove

Administrative Assistant

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BEFORE THE FEDERAL BLECTION CONTISSION ED OFFICE OF THE FEC COMMISSION SECRETARY

In the Matter of

National Congressional Club)
Carter Wrenn, treasurer)
Helms for Senate)
Mark L. Stephens, treasurer)

MUR 17868 JUN 14 P4: 11



GENERAL COUNSEL'S REPORT

I. BACKGROUND

On November 27, 1984, the Federal Election Commission ("Commission") made reason to believe determinations with respect to the National Congressional Club ("NCC") and Carter Wrenn, as treasurer, and Helms for Senate ("HFS") and Mark L. Stephens, as treasurer. The basis for the Commission's determinations was the production and broadcast of the "Americans for Reagan" television advertisement in which Senator Helms appeared on behalf of President Reagan.

After consideration of respondents' answers to the General Counsel's questions (sent to respondents following the reason to believe determinations), the Commission, on April 23, 1985, made further reason to believe determinations with respect to NCC and HFS.

Reason to believe notification letters were mailed to respondents on April 25, 1985. Respondents' counsel requested and received an extension of time until May 23, 1985, to respond to the Commission's additional reason to believe determinations. A letter was received from respondents' counsel on May 22, 1985.

II. <u>LEGAL ANALYSIS</u>

In their letter dated May 22, 1985, respondents' counsel failed to address any of the substantive issues raised by the Commission's additional reason to believe determinations.

Instead, respondents submitted a requested for procedural relief, seeking consolidation of this matter with MUR 1792.

MUR 1792 is based on a complaint filed on September 20, 1984, by the same complainant as in the present matter. The complaint in MUR 1792 is complex and broad in scope, involving a series of distinct events and occurrences. These include, among others, the provision and purchase of a variety of goods and services, such as furniture, staff time, airline tickets and computer software; the use of common vendors for direct mail, advertising and consulting; the sharing of a joint insurance account; and the arrangement of candidate debates. The complaint in MUR 1792 involves thirteen different parties and at least seventeen allegations. The Commission, on December 18, 1984, made nine reason to believe determinations against seven parties.

By contrast, MUR 1748 is substantially more limited in scope than MUR 1792. There is no complexity of parties in MUR 1748, as only two respondents are involved: NCC and HFS. MUR 1748 is concerned with a single factual event, the "Americans for Reagan" television advertisement, which alone is the basis for the Commission's reason to believe determinations in this matter.

Consolidation of these two matters would significantly delay the progress and investigation of MUR 1748. Whereas the

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Because of the complex and broad nature of MUR 1792 and the potential for delay in MUR 1748, the Office of General Counsel recommends that the Commission decline to consolidate MUR 1748 with MUR 1792.

Additionally, at this stage of its investigation into
MUR 1748, the Office of General Counsel is still without all the
necessary information required to make future dispositive
recommendations to the Commission on the legal and factual issues
of this matter. Respondents failed to address, in substance, the
Commission's reason to believe determinations of April 23, 1985.
As a result, the Office of General Counsel has prepared certain
questions and request for documents to be sent to respondents
under Order and Subpoena. Accordingly, the Office of General
Counsel recommends that the Commission approve the attached Order
and Subpoena with questions and request for documents to be sent
to respondents.

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III. RECOMMENDATIONS The Office of General Counsel recommends that the Commission: decline to consolidate Matters Under Review 1748 and 1. 1792: 2. authorize the attached Order and Subpoena with questions and request for documents to be sent to the National Congressional Club and Carter Wrenn, as treasurer; 3. approve the attached cover letter. תי Charles N. Steele General Counsel Associate General Counsel Attachments Order and Subpoena (1) 2. Letter (1) α

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
National Congressional Club) MUR 1748
Carter Wrenn, treasurer)
Helms for Senate)
Mark L. Stephens, treasurer)

SUBPOENA TO PRODUCE DOCUMENTS ORDER TO SUBMIT WRITTEN ANSWERS

Pursuant to 2 U.S.C. § 437d(a)(1) and (3) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and Subpoenas you to produce requested documents.

Such answers must be submitted under oath and must be forwarded to the Commission within 10 days of your receipt of this Order/Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on ______, 1985.

John Warren McGarry Chairman

ATTEST:

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Marjorie W. Emmons Secretary to the Commission

Attachment Questions

Subpoena and Order to: National Congressional Club **Definitions** The terms "and" and "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of this request any answers or documents which may be otherwise construed to be out of its scope. The term "person" includes an individual, partnership, 2. committee, association, corporation, labor organization, or any other organization or group of persons. **OUESTIONS** In the National Congressional Club's ("NCC") response to the Federal Election Commission's ("Commission") questions, dated January 7, 1985, R.E. Carter Wrenn, Executive Director of NCC, asserts that Helms for Senate ("HFS") paid \$1,938.63 for the production of the Americans for Reagan ("AFR") television advertisement, which was one-half of the initial production cost. 1(a) Please specify in detail what NCC did to produce the AFR advertisement. 1(b) Were any other persons, organizations or entities involved in the production of the AFR advertisment? If the answer is yes, please identify who and specify what they did with regard to the production of the AFR ad. 1(c) Please state what portion of the \$1,938.63 paid by HFS is attributable to the actual expenses incurred by NCC in producing the AFR advertisement. 1(d) Please state what portion, if any, of the \$1,938.63 paid by HFS is attributable to overhead incurred by NCC in producing the AFR advertisement. 2 1(e) Please state what portion, if any, of the \$1,938.63 C paid by HFS represents a profit charged by NCC to HFS for production of the advertisement. In the affidavit of Mr. Wrenn dated September 10, 1984, and submitted in response to the Commission's reason to believe determinations, Mr. Wrenn asserts that HFS's share of advertising for the AFR ad on North Carolina television stations was \$30,502.50, which was one-half of the total. Mr. Wrenn also asserts that HFS paid one-half of the advertising of AFR on a South Carolina television station (which broadcast into North Carolina) amounting to \$125. 2(a) Of the \$30,627.50 allocated to HFS, what portion was paid or represents amounts paid, to the North and South Carolina television stations on which the ad was run?

Questions Page 2 2(b) Of the \$30,627.50 allocated to HFS, what portion, if any, is attributable to the overhead of the media time buyer and the costs of providing the media buy for the AFR ad? 2(c) Of the \$30,627.50 allocated to HFS, what portion, if any, represents the profit charged by the media time buyer for the time buying service for the AFR ad? 2(d) If the answer to 2(c) indicates that a profit was realized on the media time buying service for the AFR advertisement, please explain how the amount to be charged to HFS as profit was finally determined and who made this determination. 0 0 9 Œ

REQUEST FOR DOCUMENTS

- 1. Please submit copies of all purchase orders or other evidence of agreement with which media time was purchased for the AFR advertisement from television stations broadcasting in whole or part to a North Carolina audience.
- 2. Please submit copies of all checks or other evidence of payment for television media time purchased for the AFR ad from television stations broadcasting in whole or part to a North Carolina audience.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Elliott Schulder, Esquire Covington and Burling 1201 Pennsylvania Avenue, N.W. P.O. Box 7566 Washington, D.C. 20044

RE: MUR 1748
National Congressional Club and
Carter Wrenn, as treasurer

Dear Mr. Schulder:

On April 25, 1985, you were notified that the Commission found reason to believe that your clients violated 2 U.S.C. \$ 434 and \$ 441a of the Federal Election Campaign Act of 1971, as amended. The Commission has considered your May 22, 1985 request for procedural relief and on , 1985, declined to consolidate MUR 1748 and MUR 1792.

An investigation of MUR 1748 is being conducted and it has been determined that additional information from your clients is necessary. Consequently, the Commission has issued the attached subpoena and order which requires your clients to provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, U.S. Code.

It is required that the information be submitted under oath and within ten (10) days of your receipt of this subpoena and order.

Elliott Schulder, Esquire Page 2 If you have any questions, please direct them to Eric Kleinfeld, the attorney handling this matter, at (202) 523-4000. Sincerely, Charles N. Steele General Counsel BY: Kenneth A. Gross Associate General Counsel Enclosures Subpoena and Order Questions LO V 0 0 C C œ



FEDERAL ELECTION COMMISSION

WASHINGTON.D.C. 20463

July 10, 1985

John R. Bolton, Esquire Covington & Burling 1201 Pennsylvania Avenue, N.W. Washington, D.C. 20044

Re: MUR 1748
National Congressional Club
and Carter Wrenn, as
Treasurer

Dear Mr. Bolton:

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This is in reference to your letter dated July 2, 1985, requesting an extension of 7 days to respond to the Commission's interrogatories and request for documents. After considering the circumstances presented in your letter, the Commission has determined to grant you your requested extension. Accordingly, your response will be due on July 18, 1985.

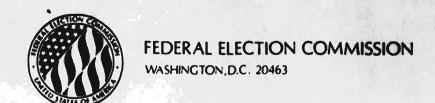
If you have any questions, please contact Eric Kleinfeld, the attorney assigned to this matter at (202) 523-4000.

Sincerely,

Charles N. Steele General Counsel

By: Kenneth A. Gross

Associate General Counsel



John R. Bolton, Esquire Covington & Burling 1201 Pennsylvania Avenue, N.W. Washington, D.C. 20044

Re: MUR 1748
National Congressional Club
and Carter Wrenn, as
Treasurer

Dear Mr. Bolton:

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Sincerely,

Charles N. Steele General Counsel

By: Kenneth A. Gross
Associate General Counsel

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COVINGTON BU

1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566 WASHINGTON, D. C. 20044

(202) 662-6000 WRITER'S DIRECT DIAL NUMBER (202) 662-5432

H, Thomas Austern
Portaine G. Bradley
Edward Suffluing, Jr.
Homand G. Westwood
Charles A, Horsey
Johns T. Saprenza
James H. Moslothlin
Edward W. Jennes
Gourse

Kleinfeld

JOHN SHERMAN COOPER

TELEBOOGO (202) 001-0200 TELEBOOGO (202) 001-0200

July 2, 1985

Kenneth A. Gross, Esq. Associate General Counsel Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463

Re: MUR 1748

Dear Mr. Gross:

We received your letter of June 27, 1985, on July 1, 1985. Your letter states that responses to the subpoena enclosed with the letter were due ten days after our receipt of the materials, on July 11, 1985.

Because the Fourth of July holiday falls between our receipt of the subpoena and the due date for our responses, we request a one-week extension until July 18, 1985. We believe that this brief delay will facilitate the National Congressional Club's ability to respond, and will not disrupt the Commission's work.

Sincerely yours,

John R. Bolton

COVINGTON & BURLING

IZOI PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

(202) 662-6000 WRITER'S DIRECT DIAL NUMBER (202) 662-5432

H. THOMAS AUSTERN FONTAINE C. BRADLEY EDWARD SURLING, JR. HOWARD C. WESTWOOD CHARLES A. HORSIN JOHN T. EAPLENEA JAMES H. MISLOTHLIN ERHEST W. JENNES

GCC#7903 Kleinfeld

JOHN SHERMAN COOPER

TWR 710 822-0005 (CS WSH)
TELERO 88-865 (COVLING WSH)
TELECOPIER (208) 662-6290
CABLE COVLING

July 2, 1985

HARRY & SHINDERMAN

LANCE & STANDER

LAN

Kenneth A. Gross, Esq. Associate General Counsel Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463

Re: MUR 1748

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Sincerely yours,

Mhn R. Bolton

GCC#7549 Kleinfeld

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566 WASHINGTON, D. C. 20044

(202) 662-6000 WRITER'S DIRECT DIAL NUMBER

(202) 662-5316

May 22, 1985

Fontaine C. Bradley Edward Burling, Jr., Howard C. Westwood Charles A. Horsky John T. Sapienza James H. Moslothlin Ernest W. Jennes Edwin S. Cohen

JOHN SHERMAN COOPER

TWX: 710 828-0006 (CB WSH)
TELEXI 60-203 (COVLING WSH)
TELECOPIER INFORMATION:
(202) 608-6260
CABLE! COVLING

BY HAND

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
7th Floor
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1748

National Congressional Club and Carter Wrenn, as treasurer;

Helms for Senate

and Mark L. Stephens, as treasurer

Dear Mr. Steele:

We represent the respondents in the above matter. On May 9, 1985, two lawyers on your staff, Lee Anderson and Eric Kleinfeld, met with Elliott Schulder of this firm for the purpose of explaining the basis for the Commission's reason-to-believe findings embodied in its letters of April 25, 1985. Based on that discussion, it is our understanding that the Commission's reason-to-believe votes in this matter rest on the same theory underlying the proceeding in MUR 1792. We believe that the interests of fairness and efficiency dictate that the Commission undertake its consideration of alleged violations based on this theory in a single proceeding rather than in separate proceedings. Accordingly, respondents respectfully request that the Commission consolidate its consideration of this matter together with its consideration of MUR 1792.

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COVINGTON & BURLING Charles N. Steele, Esq. May 22, 1985 Page 2 We would be happy to meet with you or members of your staff to discuss further our request that MUR 1748 and MUR 1792 should be consolidated. Sincerely, melgets Brice M. Clagett John R. Bolton Elliott Schulder ·C Œ



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 9, 1985

Elliot Schulder, Esq.
Covington & Burling
1201 Pennsylvania Ave., N.W.
P.O. Box 7566
Washington, D.C. 20044

RE: MUR 1748
National Congressional Club
Carter Wrenn, Treasurer
Helms for Senate
Mark L. Stephens, Treasurer

Dear Mr. Schulder:

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This is in reference to your letter dated May 7, 1985, requesting an extension until May 23, 1985 to respond to the Commission's reason to believe determinations in MUR 1748. After considering the circumstances presented in your letter, the Commission has determined to grant you your requested extension. Accordingly, your response will be due on May 23, 1985.

If you have any questions, please contact Eric Kleinfeld, the attorney assigned to this matter at (202)523-4000.

Sincerely,

Charles N. Steele General Counsel

Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Elliot Schulder, Esq.
Covington & Burling
1201 Pennsylvania Ave., N.W.
P.O. Box 7566
Washington, D.C. 20044

RE: MUR 1748
National Congressional Club
Carter Wrenn, Treasurer
Helms for Senate
Mark L. Stephens, Treasurer

Dear Mr. Schulder:

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If you have any questions, please contact Eric Kleinfeld, the attorney assigned to this matter at (202)523-4000.

Sincerely,

Charles N. Steele General Counsel

By: Kenneth A. Gross
Associate General Counsel

COVINGTON & BURLING 1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

A11:

TWX: 710 822-0005 (CB WSH) TELEX 89-803 (COVLING WSH) TELECOPIER INFORMATIONS (202) 862-6280

CABLE: COVLING

May 7, 1985

BY HAND

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TELEPHONE

(202) 662-6000

WRITER'S DIRECT DIAL NUMBER

(202) 662-5462

Eric Kleinfeld, Esq. Federal Election Commission 7th Floor 1325 K Street, N.W. Washington, D.C. 20463

> Re: MUR 1748

Dear Mr. Kleinfeld:

Pursuant to our telephone conversations of yesterday, I am writing to confirm our meeting at your office on Thursday morning, May 9, 1985, at 10:00 a.m., to discuss the above matter. In addition, I would like to request an extension of two weeks from the date of our meeting, until May 23, 1985, to respond to the Commission's reason to believe letters dated April 25, 1985. As I mentioned to you on the phone, Dan Rowley, who had previously been assigned to this matter, has left the firm and I am still in the process of familiarizing myself with the factual and legal background of this matter. Moreover, I understand that it is most unusual for the Commission to issue a second reason to believe letter with regard to the same matter, and even after your attempts at explaining the Commission's position, I remain puzzled as to the legal and factual basis for the Commission's reason to believe vote.

If you have any questions, please do not hesitate to Thank you for your assistance in this matter. call.

Sincerely.

Elliott Schulder

cc: Mr. Bolton

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566 WASHINGTON, D. C. 20044 AV 7

A11: 31

TWX:710 622-0005 (CB WSH)
TELEX 69-503 (COVLING WSH)
TELECOPER INFORMATION:
(302) 662-6260
CABLE: COVLING

TELEPHONE (202) 662-6000

WRITER'S DIRECT DIAL NUMBER

(202) 662-5462

May 7, 1985

BY HAND

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Eric Kleinfeld, Esq. Federal Election Commission 7th Floor 1325 K Street, N.W. Washington, D.C. 20463

Re: MUR 1748

Dear Mr. Kleinfeld:

Pursuant to our telephone conversations of yesterday, I am writing to confirm our meeting at your office on Thursday morning, May 9, 1985, at 10:00 a.m., to discuss the above matter. In addition, I would like to request an extension of two weeks from the date of our meeting, until May 23, 1985, to respond to the Commission's reason to believe letters dated April 25, 1985. As I mentioned to you on the phone, Dan Rowley, who had previously been assigned to this matter, has left the firm and I am still in the process of familiarizing myself with the factual and legal background of this matter. Moreover, I understand that it is most unusual for the Commission to issue a second reason to believe letter with regard to the same matter, and even after your attempts at explaining the Commission's position, I remain puzzled as to the legal and factual basis for the Commission's reason to believe vote.

If you have any questions, please do not hesitate to call. Thank you for your assistance in this matter.

Sincerely,

Elliott Schulder

cc: Mr. Bolton

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

Eric Kleinfeld, Fsq. Federal Election Commission 7th Floor

1325 K Street, N.W. Washington, D.C. 20463

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

National Congressional Club

R.E. Carter Wrenn, as treasurer

Helms for Senate

Mark L. Stephens, as treasurer

)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of April 23, 1985, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions in MUR 1748:

1. Find reason to believe that the National Congressional Club and R.E. Carter Wrenn, as treasurer, violated 2 U.S.C. \$\$ 434(b) (2) (D) and 434(b) (4) (H) (i).

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- Find reason to believe that Helms for Senate and Mark L. Stephens, as treasurer, violated 2 U.S.C. §§ 434(b)(2)(D) and 434(b)(4)(G).
- 3. Find reason to believe that Helms for Senate and Mark L. Stephens, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

(continued)

- 4. Find reason to believe that the National Congressional Club and R.E. Carter Wrenn, as treasurer, violated 2 U.S.C. § 441a(f).
- 5. Approve the letters attached to the General Counsel's report dated April 10, 1985.

Commissioners Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision; Commissioners Aikens and Elliott dissented.

Attest:

4-23-85

Date

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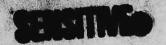
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Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission



BEFORE THE FEDERAL ELECTION COMMISSION

or App 11 All: 39

National Congressional Club R.E. Carter Wrenn, as treasurer Helms for Senate Mark L. Stephens, as treasurer

MUR 1748

GENERAL COUNSEL'S REPORT

I. BACKGROUND

In the Matter of

On August 2, 1984, David E. Price, Executive Director of the North Carolina Democratic Party, filed a complaint with the Federal Election Commission ("Commission") against the National Congressional Club ("NCC") and R.E. Carter Wrenn, as treasurer, and Helms for Senate ("Helms Committee") and Mark L. Stephens, as treasurer. The basis of the complaint is a television advertisement, paid for in part by NCC and in part by the Helms Committee, entitled "Americans for Reagan," in which Senator Jesse Helms speaks on behalf of President Reagan.

On November 27, 1984, the Commission determined there is reason to believe NCC and Carter Wrenn, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A) by making an excessive in-kind contribution to the Helms Committee. The Commission further found reason to believe that the Helms Committee and Mark L. Stephens, as treasurer, violated 2 U.S.C. §441a(f) by accepting such a contribution. In conjunction with these determinations, the Commission approved and authorized the sending of questions to NCC in order to ascertain the advertisement's production costs

and the extent of its broadcast outside North Carolina. NCC's response was received on January 7, 1985.

In response to the Commission's question concerning production costs, NCC indicated that the total cost for producing the advertisement was \$4279.58, consisting of \$3877.26 for the initial production and \$402.32 for a subsequent disclaimer placed on the ad for broadcast outside North Carolina. NCC also indicated that the initial production cost (\$3877.26) was allocated between it and the Helms Committee on the same basis (50%-50%) as was the cost of media time, with each committee paying \$1938.63. The \$402.32 was paid entirely by NCC.

In response to the Commission's question concerning where outside North Carolina the ad was broadcast, NCC answered that the ad ran on six (6) stations in six cities (Dallas, Houston, Phoenix, Anaheim, West Palm Beach and Allentown, PA) for a period of two to four days each in September 1984 and at a cost of from \$850 to \$1000 each. The total cost was \$5825, paid entirely by NCC. None of these stations broadcast into North Carolina.

The ad was also broadcast on a Greenville, South Carolina television station, at a cost of \$250, and because the broadcast reached North Carolina, the cost was allocated on a 50%-50% basis between NCC and the Helms Committee.

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II. FACTUAL AND LEGAL AMALYSIS

- A. The Provision Of Services And Receipt Of Payments
 For Services Are Contributions By And To NCC,
 Subject To The Reporting Requirements Of 2 U.S.C.
 § 434 And To The Limitations Of 2 U.S.C. § 441a(a).
 - 1. Factual Background

puring the fall and winter of 1983-84, NCC decided to produce and did in fact produce several commercials promoting the candidacy of President Reagan, including the one at issue here, "Americans for Reagan," in which Senator Helms appears on President Reagan's behalf. According to NCC, in its response to the complaint in this matter, the commercial was produced entirely by NCC without consultation of any sort with officials of the Helms Committee. Yet NCC makes no attempt to dispute, and in fact admits, the allegation that this commercial actually benefits Senator Helms as well as President Reagan. The benefit to Senator Helms was recognized as so significant that NCC allocated an equal portion of the production costs to the Helms Committee, even though the ostensible purpose of the ad was NCC's own independent expenditure project on behalf of President Reagan.

During the period between July 11 and July 18, 1984, NCC made a decision to purchase media time to broadcast "Americans for Reagan" in North Carolina. Realizing the significant benefit to be derived by Senator Helms through broadcast solely to a North Carolina audience, NCC together with the Helms Committee,

purchased a total of \$61,255 of television time, with each committee paying one-half (\$30,627).

All purchases of media time were made by Jefferson
Marketing, Inc. ("JMI"). As the General Counsel's investigation
in MUR 1503 revealed, and as the Commission itself recognized
with respect to the reporting requirements of the Federal
Election Campaign Act ("Act"), NCC and JMI effectively operate as
one entity. Through its Executive Director, Carter Wrenn, NCC
financially dominates and controls the operations of JMI.

Where a political committee and business corporation are structured and operated so that the corporation is dominated and controlled by the committee, there is no distinction between the two for purposes of the Act. JMI is thus a mere extension of the political committee, NCC, and is subject to the same campaign financing regulation as the controlling committee. (See MUR 1503).

2. Legal Analysis

In connection with the "Americans for Reagan" television advertisement, NCC/JMI provided the Helms Committee with two distinct services. First, NCC/JMI produced the commercial. Second, NCC/JMI purchased the media time for broadcast. Services are only one of a number of items which are included within the definition of "contribution". See 11 C.F.R. \$ 100.7(a). The Commission has long recognized through Advisory

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Opinions and past enforcement actions that the provision of services by one political committee to another and the payment for those services entails certain legal consequences under the Act. The performance of a service by one political committee for another is a contribution under the Act, and as such is subject to the reporting requirements and contribution limitations of the Act. See 11 C.F.R. § 100.7(a); Advisory Opinion 1983-2. Conversely, all monies received by a political committee as payment for services it performed are also considered contributions under the Act. See 2 U.S.C. § 434(b)(2) and 11 C.F.R. § 104.3(a)(3).

NCC/JMI contends that its purpose in making an allocation of the advertisement's costs was to avoid the making of an in-kind contribution to the Helms Committee (which would have resulted in an excessive contribution). 1/ However, NCC/JMI did not approach the Helms Committee regarding NCC/JMI's desire to share expenses for the ad until after the ad was produced. Once having realized that a contribution to the Helms Committee would result, NCC/JMI contacted the Helms Committee and suggested a reimbursement of some of their costs. However, as is the case when any excessive direct contribution is made, the act of asking for the contribution's return upon realization that it was excessive does not negate the fact that the contribution was made.

^{1/} NCC made a direct contribution of \$4500 to the Helms Committee, as disclosed by NCC's 1984 July Quarterly Report.

The present situation cannot be characterized as a true joint sponsorship of an advertisement, as NCC/JMI calls it, and instead must be differentiated from such a plan. Under a true joint sponsorship plan, two committees would agree to produce and broadcast an advertisement, which presumably would have the purpose of influencing the election of both their candidates, and they would approach a third party in order to have such an ad so produced and broadcast. One committee would not have provided the entirety of the services to the other. In the present case one committee (NCC/JMI) provided all the services of production and media buys to the second committee, for one ad which had the purpose of influencing the election of both candidates, and was merely reimbursed for a share of the costs.

Allocation of expenses in connection with the advertisement does not eliminate the in-kind contribution which was made by NCC/JMI to the Helms Committee. Instead, allocation merely places a value on that contribution. One-half of the ad benefitted President Reagan, as determined by NCC/JMI, and as a result, no contribution flowed to the Helms Committee for that portion of the ad's expenses. The other fifty percent of the commercial benefitted Senator Helms (as determined by NCC/JMI). NCC/JMI provided a service (i.e. made a contribution) to the Helms Committee consisting of (1) the production of an ad benefitting Senator Helms and (2) the purchase of media time to broadcast the ad benefitting Senator Helms. The amount of the service (i.e. contribution) is equal to one-half of the

production cost (\$1938.63) and the profit on one-half of the media time purchased.2/

This conclusion is supported by past actions where the Commission has determined that commercial ventures by political committees are another form of fundraising, the proceeds of which are subject to the limitations and prohibitions of the Act. The purpose of a political committee is to influence federal elections. Commercial ventures by a political committee are designed to raise funds to influence such elections. Because the reporting provisions of the Act and Regulations make clear that, with some exceptions, all receipts for payments of services by a political committee are contributions, the amounts paid by the Helms Committee for NCC/JMI services result in contributions to NCC/JMI.3/

B. Conclusion

In JMI, NCC has created a corporation to conduct commercial operations in an attempt to circumvent the prohibitions and limitations of the Act. It follows, then, that the provision of services by JMI to any political committee are, in effect, in-kind contributions from NCC/JMI. Therefore all such contributions are subject to the reporting requirements of

^{2/} Based on a 15% profit and the Helms Committee's \$30,627 share of media time which reached a North Carolina audience, this constitutes \$4,594.05

³/ The amounts of \$1938.63 for production costs and \$4,594.05 for media services had become available for use by NCC/JMI in influencing federal elections.

§ 434 and the contribution limits of § 441a(a). If the provision of services by NCC/JMI to other political committees is a contribution by NCC, all payments by such political committees for services rendered by NCC/JMI, are contributions to the NCC/JMI combination, and are also subject to the reporting requirements of § 434 and contribution limits of § 441a(a). Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that the National Congressional Club and R.E. Carter Wrenn, as treasurer, violated 2 U.S.C. § 434 for failing to report the contributions made to and received from the Helms Committee. The Office of General Counsel recommends that the Commission find reason to believe that Helms for Senate and Mark L. Stephens, as treasurer, violated 2 U.S.C. § 434 for failing to report the contributions made to and received from NCC.

Additionally, because the Helms Committee is deemed to have made an excessive contribution to NCC, the Office of General Counsel recommends that the Commission find reason to believe that Helms for Senate and Mark L. Stephens, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A). The Office of General Counsel also recommends that the Commission find reason to believe that the National Congressional Club and R.E. Carter Wrenn, as treasurer, violated 2 U.S.C. §441a(f) by accepting an excessive contribution from Helms for Senate.

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III. RECOMMENDATORS

- Find reason to believe that the National Congressional Club 1. and R.E. Carter Wrenn, as treasurer, violated 2 U.S.C. \$\$ 434(b)(2)(D) and 434(b)(4)(H)(i).
- Find reason to believe that Helms for Senate and Mark L. 2. Stephens, as treasurer, violated 2 U.S.C. §§ 434(b)(2)(D) and 434 (b) (4) (G).
- 3. Find reason to believe that Helms for Senate and Mark L. Stephens, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).
- Find reason to believe that the National Congressional Club and R. E. Carter Wrenn, as treasurer, violated 2 U.S.C. \$ 44la(f).

Approve attached letters.

nil 10,1985

Charles N. Steele General Counsel

Gross Assistant General Counsel

Attachments

I. NCC's response

Proposed Letters

COVINGTON & BURLING MUL 1748

1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

January 16, 1985

TWX: 710 622-0005 (CB WSH)
TELECUSER INFORMATION
(202) 662-6280
CABLE! COVLINE

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HAND DELIVER

(202) 662-5344

TELEPHONE

(202) 662-6000

WRITER'S DIRECT DIAL NUMBER

Gary Johansen, Esq. Federal Election Commission 1325 K Street, N.W. 7th Floor Washington, D.C. 20463

Re: MUR 1748

Dear Mr. Johansen:

Enclosed is an executed copy of the response filed January 7 in the above matter. Please let me know if you have any questions.

Sincerely,

Daniel A. Rowley

Enclosure

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

The National Congressional Club and the Helms for Senate Committee

MUR 1748

RESPONSE OF THE NATIONAL CONGRESSIONAL CLUB

This is the response of the National Congressional Club
("NCC") to the Federal Election Commission's questions dated

Dacamber 5, 1984, in the above matter. The undersigned,

R.E. Carter Wrenn, is Executive Director of NCC and has personal knowledge of the matters discussed herein.

Question 1: What was the total cost of producing or making the television advertisement "Americans for Reagan" referred to in the complaint and attached as Attachment A to these questions?

Answer: The total production cost for this advertisement was \$4,279.58. This cost of the advertisement consists of two amounts: (1) \$3,877.26 for the initial production in the form attached as Attachment A to the Commission's December 5 questions, and (2) \$402.32 to modify the disclaimer on the advertisement to read: "Paid for by the National Congressional Club. Not authorized by any Presidential candidate or Presidential candidate's committee." This second expenditure was necessary so that the disclaimer would be accurate when the commercial aired outside North Carolina.

Question 2: Was the production cost for the "Americans for Reagan" advertisement paid entirely by NCC or did the Helms for Senate Committee ("HFS") also pay for part of the cost? If this cost was allocated between NCC and HFS, please indicate the amount paid by each committee.

Answer: When producing the advertisement, NCC recognized that, like the cost of media time benefiting Senator Helms' campaign, some portion of the production cost benefited HFS and should be allocated to it. At the time of production, NCC and HFS did not know how many times the advertisement would air in North Carolina as compared to airings outside the state. NCC and HFS accordingly agreed to allocate the initial production cost of \$3,877.26 on the same basis (50-50) as we decided to allocate the cost of media time when North Carolina voters viewed the commercial. We believed this to be a reasonable division of the cost given the uncertainties and complexities involved in any other conceivable allocation method. On that basis, NCC and HFS each paid \$1,938.63, one half of the initial production cost.

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As to the \$402.32 to modify the disclaimer for airing the advertisement outside North Carolina, NCC paid the entire amount. NCC did so because it received all the benefit from that expense.

Question 3: Mr. Wrenn states in his affidavit that NCC purchased television time for the "Americans for Reagan" advertisement in cites which were not located in North Carolina. For each television station located outside North Carolina where television time was purchased to run "Americans for Reagan" list the following:

- 1) the name of the television station;
- 2) the city and state in which the television station is located;

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- 3) the dates on which the advertisement was run; and
- 4) the cost of the television time.

In answering this question, please identify each station located outside North Carolina where the station reaches a substantial number of North Carolina viewers and where the costs for television time were divided between NCC and EFS.

Answer: NCC aired the commercial in the following cities outside North Carolina:

STATION	MARKET	DATES	COST	PENETRATION
KRLD TV	Dallas, TX	9/22-9/23	\$1,000	No
KNXV TV	Phoenix, AZ	9/8-9/9	\$ 975	No
KFMZ TV	Allentown, PA	9/7-9/8	\$1,000	No
WPEC TV	West Palm Beach, FL	9/7-9/10	.\$1,000	No
KDOC TV	Anaheim, CA	9/8-9/9	\$ 850	No
KRIV TV	Houston, TX	9/7-9/9	\$1,000	No

In addition to the above, the commercial also aired on one television station in South Carolina: WHNS in Greenville, SC. It aired there on July 22, 1984, at a total cost of \$250. As noted at page 5, note 1, of NCC's and HFS's September 10, 1984, response to the complaint, NCC and HFS split the cost of that airing on a 50-50 basis because a substantial number of North Carolina voters watch WHNS (Greenville is near the border of North and South Carolina). That is the only instance of an airing outside North Carolina where NCC and HFS shared the cost of media time.

Under penalty of perjury, I declare that the foregoing response is accurate and true to the best of my knowledge and belief.

Date: 1-14-85

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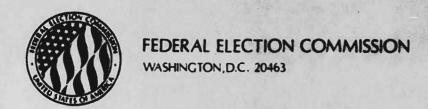
6 0

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R. E. Carter Wrenn

Sworn and subscribed to before me this 14 day of January, 1985.

Vicie 2. Onlean
Notary Public



Daniel A. Rowley, Esquire Covington & Burling 1201 Pennsylvania Avenue, N.W. P.O. Box 7566 Washington, D.C. 20044

Re: MUR 1748
National Congressional Club and
Carter Wrenn, as treasurer

Dear Mr. Rowley:

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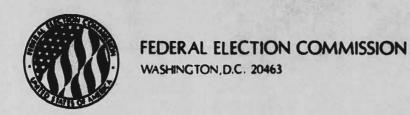
Based on a complaint filed with the Commission on August 6, 1984, and information supplied by your client, the Commission determined on November 27, 1984, that there was reason to believe that your client had violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

Upon further review of the allegations contained in the complaint and information supplied by your client, the Commission on , determined that there is reason to believe the National Congressional Club and Carter Wrenn, as treasurer, violated 2 U.S.C. §§ 434(b)(12)(D) and 434(b)(4)(H)(i) of the Act. Specifically, the Commission found reason to believe that the National Congressional Club and Carter Wrenn, as treasurer, failed to report contributions made to and received from Helms for Senate, in connection with the "Americans for Reagan" television advertisement.

In addition, the Commission also determined on that there is reason to believe that the National Congressional Club and Carter Wrenn, as treasurer, violated 2 U.S.C. § 441a(f) of the Act. Specifically, the Commission found reason to believe that the National Congressional Club and Carter Wrenn, as treasurer, accepted an excessive contribution from Helms for Senate, in connection with the "Americans for Reagan" television advertisement.

Daniel A. Rowley, Esquire Page 2 You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten (10) days of your receipt of this notification. The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against your client, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures. 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 your client wishes the matter to be made public. If you have any questions, please contact Eric Kleinfeld, the attorney assigned to this matter, at (202) 523-4000. Sincerely, John Warren McGarry Chairman Enclosure 0 Procedures 3 C 0 a





John Bolton, Esquire
Covington & Burling
1201 Pennsylvania Avenue, N.W.
P.O. Box 7566
Washington, D.C. 20044

Re: MUR 1748
Helms for Senate and
Mark L. Stephens, as treasurer

Dear Mr. Bolton:

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Based on a complaint filed with the Commission on August 6, 1984, and information supplied by your client, the Commission determined on November 27, 1984, that there was reason to believe that your client had violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

Upon further review of the allegations contained in the complaint and information supplied by your client, the Commission on , determined there is reason to believe that Helms for Senate and Mark L. Stephens, as treasurer, violated 2 U.S.C. §§ 434(b)(2)(D) and 434(b)(4)(G) of the Act. Specifically, the Commission found reason to believe that Helms for Senate and Mark L. Stephens, as treasurer, failed to report contributions made to and received from the National Congressional Club, in connection with the "Americans for Reagan" television advertisement.

In addition, the Commission also determined, on , that there is reason to believe that Helms for Senate and Mark L. Stephens, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A) of the Act. Specifically, the Commission found reason to believe that Helms for Senate and Mark L. Stephens, as treasurer, made a contribution in excess of \$5,000 to the National Congressional Club, in connection with the "Americans for Reagan" television advertisement.

John Bolton, Esquire Page 2 You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten (10) days of your receipt of this notification. The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against your client, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures. 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 your client wishes the matter to be made public. If you have any questions, please contact Eric Kleinfeld, the attorney assigned to this matter, at (202) 523-4000. Sincerely, LO John Warren McGarry Chairman Enclosure 0 Procedures 3 0 2 00

April 25, 1985

John Bolton, Esquire
Covington & Burling
1201 Pennsylvania Avenue, N.W.
P.O. Box 7566
Washington, D.C. 20044

Re: MUR 1748
Helms for Senate and
Mark L. Stephens, as treasurer

Dear Mr. Bolton:

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Based on a complaint filed with the Commission on August 6, 1984, and information supplied by your client, the Commission determined on November 27, 1984, that there was reason to believe that your client had violated 2 U.S.C. § 44la(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

Upon further review of the allegations contained in the complaint and information supplied by your client, the Commission on April 23, 1985, determined there is reason to believe that Helms for Senate and Mark L. Stephens, as treasurer, violated 2 U.S.C. §§ 434(b)(2)(D) and 434(b)(4)(G) of the Act. Specifically, the Commission found reason to believe that Helms for Senate and Mark L. Stephens, as treasurer, failed to report contributions made to and received from the National Congressional Club, in connection with the "Americans for Reagan" television advertisement.

In addition, the Commission also determined, on April 23, 1985, that there is reason to believe that Helms for Senate and Mark L. Stephens, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A) of the Act. Specifically, the Commission found reason to believe that Helms for Senate and Mark L. Stephens, as treasurer, made a contribution in excess of \$5,000 to the National Congressional Club, in connection with the "Americans for Reagan" television advertisement.

John Bolton, Esquire Page 2 You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten (10) days of your receipt of this notification. The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against your client, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures. 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 your client wishes the matter to be made public. If you have any questions, please contact Eric Kleinfeld, the attorney assigned to this matter, at (202) 523-4000. Chairman Enclosure Procedures 9 œ

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 25, 1985

Daniel A. Rowley, Esquire Covington & Burling 1201 Pennsylvania Avenue, N.W. P.O. Box 7566 Washington, D.C. 20044

Re: MUR 1748
National Congressional Club and
Carter Wrenn, as treasurer

Dear Mr. Rowley:

Based on a complaint filed with the Commission on August 6, 1984, and information supplied by your client, the Commission determined on November 27, 1984, that there was reason to believe that your client had violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

Upon further review of the allegations contained in the complaint and information supplied by your client, the Commission on April 23, 1985, determined that there is reason to believe the National Congressional Club and Carter Wrenn, as treasurer, violated 2 U.S.C. §§ 434(b)(12)(D) and 434(b)(4)(H)(i) of the Act. Specifically, the Commission found reason to believe that the National Congressional Club and Carter Wrenn, as treasurer, failed to report contributions made to and received from Helms for Senate, in connection with the "Americans for Reagan" television advertisement.

In addition, the Commission also determined on April 23, 1985, that there is reason to believe that the National Congressional Club and Carter Wrenn, as treasurer, violated 2 U.S.C. § 44la(f) of the Act. Specifically, the Commission found reason to believe that the National Congressional Club and Carter Wrenn, as treasurer, accepted an excessive contribution from Helms for Senate, in connection with the "Americans for Reagan" television advertisement.

Daniel A. Rowley, Esquire Page 2 You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten (10) days of your receipt of this notification. The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against your client, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures. 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 your client wishes the matter to be made public. If you have any questions, please contact Eric Kleinfeld, the attorney assigned to this matter, at (202) 523-4000. hn Warren McGarry Chairman Enclosure 0 Procedures M 2 Œ

GC0# 6433

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

January 16, 1985

TWX:710 62E-0005 (CS WSH)
TELEX: 68-883 (COVLING WSH)
TELECOPIER IMPORMATION:
(201): 662-6280
CABLE: COVLING

TELEPHONE (202) 662-6000

WRITER'S DIRECT DIAL NUMBER

(202) 662-5344

HAND DELIVER

Gary Johansen, Esq. Federal Election Commission 1325 K Street, N.W. 7th Floor Washington, D.C. 20463

Re: MUR 1748

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Dear Mr. Johansen:

Enclosed is an executed copy of the response filed January 7 in the above matter. Please let me know if you have any questions.

Sincerely

Daniel A. Rowley

Enclosure

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BEFORE THE FEDERAL ELECTION COMMISSION In the Matter of The National Congressional Club and the Helms for Senate Committee RESPONSE OF THE NATIONAL CLUB This is the response of the National Congression ("NCC") to the Federal Election Commission's questions described to the Pederal Election Commission of the Pederal Elect

This is the response of the National Congressional Club ("NCC") to the Federal Election Commission's questions dated

Dacamber 5, 1984, in the above matter. The undersigned,

R.E. Carter Wrenn, is Executive Director of NCC and has personal knowledge of the matters discussed herein.

Question 1: What was the total cost of producing or making the television advertisement "Americans for Reagan" referred to in the complaint and attached as Attachment A to these questions?

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Answer: The total production cost for this advertisement was \$4,279.58. This cost of the advertisement consists of two amounts: (1) \$3,877.26 for the initial production in the form attached as Attachment A to the Commission's December 5 questions, and (2) \$402.32 to modify the disclaimer on the advertisement to read: "Paid for by the National Congressional Club. Not authorized by any Presidential candidate or Presidential candidate's committee." This second expenditure was necessary so that the disclaimer would be accurate when the commercial aired outside North Carolina.

2 -Question 2: Was the production cost for the "Americans for Reagan advertisement paid entirely by NCC or did the Helms for Senate Committee ("HFS") also pay for part of the cost? If this cost was allocated between NCC and HFS, please indicate the amount paid by each committee. Answer: When producing the advertisement, NCC recognized that, like the cost of media time benefiting Senator Helms' campaign, some portion of the production cost benefited HFS and should be allocated to it. At the time of production, NCC and HFS did not know how many times the advertisement would air in North Carolina as compared to airings outside the state. NCC and HFS accordingly agreed to allocate the initial production cost of \$3,877.26 on the same basis (50-50) as we decided to allocate the cost of media time when North Carolina voters viewed the LO commercial. We believed this to be a reasonable division of the cost given the uncertainties and complexities involved in any other conceivable allocation method. On that basis, NCC and HFS each paid \$1,938.63, one half of the initial production cost. As to the \$402.32 to modify the disclaimer for airing 0 the advertisement outside North Carolina, NCC paid the entire 2 Œ amount. NCC did so because it received all the benefit from that expense. Question 3: Mr. Wrenn states in his affidavit that NCC purchased television time for the "Americans for Reagan" advertisement in cites which were not located in North Carolina. For each television station located outside North Carolina where television time was purchased to run "Americans for Reagan" list the following: the name of the television station; 1) the city and state in which the television station 2) is located;

- 3) the dates on which the advertisement was run; and
- 4) the cost of the television time.

In answering this question, please identify each station located outside North Carolina where the station reaches a substantial number of North Carolina viewers and where the costs for television time were divided between NCC and HFS.

Answer: NCC aired the commercial in the following cities outside North Carolina:

STATION	MARKET	DATES	COST	N.C. PENETRATION
KRLD TV	Dallas, TX	9/22-9/23	\$1,000	No
KNXV TV	Phoenix, AZ	9/8-9/9	\$ 975	No
KFMZ TV	Allentown, PA	9/7-9/8	\$1,000	No
WPEC TV	West Palm Beach, FL	9/7-9/10	\$1,000	No
KDOC TV	Anaheim, CA	9/8-9/9	\$ 850	No
KRIV TV	Houston, TX	9/7-9/9	\$1,000	No

In addition to the above, the commercial also aired on one television station in South Carolina: WHNS in Greenville, SC. It aired there on July 22, 1984, at a total cost of \$250. As noted at page 5, note 1, of NCC's and HFS's September 10, 1984, response to the complaint, NCC and HFS split the cost of that airing on a 50-50 basis because a substantial number of North Carolina voters watch WHNS (Greenville is near the border of North and South Carolina). That is the only instance of an airing outside North Carolina where NCC and HFS shared the cost of media time.

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Under penalty of perjury, I declare that the foregoing response is accurate and true to the best of my knowledge and belief.

Date: 1-14-85

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R. E. Carter Wrenn

Sworn and subscribed to before me this 14 day of January, 1985.

Vuge 2. anderen Notary Public

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

The National Congressional Club and the Helms for Senate Committee

MUR 1748

RESPONSE OF THE NATIONAL CONGRESSIONAL CLUB

This is the response of the National Congressional Club
("NCC") to the Federal Election Commission's questions dated

Dacamber 5, 1984, in the above matter. The undersigned,

R.E. Carter Wrenn, is Executive Director of NCC and has personal knowledge of the matters discussed herein.

Question 1: What was the total cost of producing or making the television advertisement "Americans for Reagan" referred to in the complaint and attached as Attachment A to these questions?

Answer: The total production cost for this advertisement was \$4,279.58. This cost of the advertisement consists of two amounts: (1) \$3,877.26 for the initial production in the form attached as Attachment A to the Commission's December 5 questions, and (2) \$402.32 to modify the disclaimer on the advertisement to read: "Paid for by the National Congressional Club. Not authorized by any Presidential candidate or Presidential candidate's committee." This second expenditure was necessary so that the disclaimer would be accurate when the commercial aired outside North Carolina.

- 2 -Question 2: Was the production cost for the "Americans for Reagan" advertisement paid entirely by NCC or did the Helms for Senate Committee ("HFS") also pay for part of the cost? If this cost was allocated between NCC and HFS, please indicate the amount paid by each committee. When producing the advertisement, NCC recog-Answer: nized that, like the cost of media time benefiting Senator Helms' campaign, some portion of the production cost benefited HFS and should be allocated to it. At the time of production, NCC and HFS did not know how many times the advertisement would air in North Carolina as compared to airings outside the state. NCC and HFS accordingly agreed to allocate the initial production cost of \$3,877.26 on the same basis (50-50) as we decided to allocate the cost of media time when North Carolina voters viewed the commercial. We believed this to be a reasonable division of the cost given the uncertainties and complexities involved in any other conceivable allocation method. On that basis, NCC and HFS 0 each paid \$1,938.63, one half of the initial production cost. 2 As to the \$402.32 to modify the disclaimer for airing C 9 the advertisement outside North Carolina, NCC paid the entire Œ amount. NCC did so because it received all the benefit from that expense. Question 3: Mr. Wrenn states in his affidavit that NCC purchased television time for the "Americans for Reagan" advertisement in cites which were not located in North Carolina. For each television station located outside North Carolina where television time was purchased to run "Americans for Reagan" list the following: the name of the television station; 1) 2) the city and state in which the television station is located:

- 3) the dates on which the advertisement was run; and
- 4) the cost of the television time.

In answering this question, please identify each station located outside North Carolina where the station reaches a substantial number of North Carolina viewers and where the costs for television time were divided between NCC and HFS.

Answer: NCC aired the commercial in the following cities outside North Carolina:

STATION	MARKET	DATES	COST	N.C. PENETRATION
KRLD TV	Dallas, TX	9/22-9/23	\$1,000	No
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KFMZ TV	Allentown, PA	9/7-9/8	\$1,000	No
WPEC TV	West Palm Beach, FL	9/7-9/10	\$1,000	No
KDOC TV	Anaheim, CA	9/8-9/9	\$ 850	No
KRIV TV	Houston, TX	9/7-9/9	\$1,000	No

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Under penalty of perjury, I declare that the foregoing response is accurate and true to the best of my knowledge and belief. Date: 1-14-85 Sworn and subscribed to before me this 14 day of January, 1985.

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Notary Public

GCC# 6274 TWX: 710 882-0005 (CE WEH) TELEX 88-883 (COVLING WSH) TELECORIER INFORMATION: (202) 662-6280 CABLE: COVLING U

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S.

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

January 7, 1985

(202) 662-5344

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TELEPHONE

(202) 662-6000

WRITER'S DIRECT DIAL NUMBER

HAND DELIVER

Gary Johansen, Esq. Federal Election Commission 1325 K Street 7th Floor Washington, D.C. 20463

> MUR 1748 Re:

Dear Mr. Johansen:

Enclosed is the response of the National Congressional Club to the Commission's questions in the above matter. An unexecuted copy is being filed today because we have not yet received an executed copy. Once we do, we will submit it.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

Daniel A. Rowley

Enclosure

BEFORE THE FEDERAL ELECTION COMMISSION In the Matter of The National Congressional Club MUR 1748 and the Helms for Senate Committee RESPONSE OF THE NATIONAL CONGRESSIONAL CLUB This is the response of the National Congressional Club ("NCC") to the Federal Election Commission's questions dated December 5, 1984, in the above matter. The undersigned, R.E. Carter Wrenn, is Executive Director of NCC and has personal knowledge of the matters discussed herein. Question 1: What was the total cost of producing or 0 making the television advertisement "Americans for Reagan" referred to in the complaint and attached as Attachment A to 3 these questions? 0 Answer: The total production cost for this advertise-5 ment was \$4,279.58. This cost of the advertisement consists of CC two amounts: (1) \$3,877.26 for the initial production in the form attached as Attachment A to the Commission's December 5 questions, and (2) \$402.32 to modify the disclaimer on the advertisement to read: "Paid for by the National Congressional Club. Not authorized by any Presidential candidate or Presidential candidate's committee." This second expenditure was necessary so that the disclaimer would be accurate when the commercial aired outside North Carolina.

- 2 -Question 2: Was the production cost for the "Americans for Reagan advertisement paid entirely by NCC or did the Helms for Senate Committee ("HFS") also pay for part of the cost? If this cost was allocated between NCC and HFS, please indicate the amount paid by each committee. When producing the advertisement, NCC recog-Answer: nized that, like the cost of media time benefiting Senator Helms' campaign, some portion of the production cost benefited HFS and should be allocated to it. At the time of production, NCC and HFS did not know how many times the advertisement would air in North Carolina as compared to airings outside the state. NCC and HFS accordingly agreed to allocate the initial production cost of \$3,877.26 on the same basis (50-50) as we decided to allocate the cost of media time when North Carolina voters viewed the commercial. We believed this to be a reasonable division of the cost given the uncertainties and complexities involved in any other conceivable allocation method. On that basis, NCC and HFS each paid \$1,938.63, one half of the initial production cost. 3 C As to the \$402.32 to modify the disclaimer for airing 5 the advertisement outside North Carolina, NCC paid the entire or. amount. NCC did so because it received all the benefit from that expense. Question 3: Mr. Wrenn states in his affidavit that NCC purchased television time for the "Americans for Reagan" advertisement in cites which were not located in North Carolina. For each television station located outside North Carolina where television time was purchased to run "Americans for Reagan" list the following: 1) the name of the television station; 2) the city and state in which the television station is located;

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KDOC TV	Anaheim, CA	9/8-9/9	\$ 850	No
KRIV TV	Houston, TX	9/7-9/9	\$1,000	No

In addition to the above, the commercial also aired on one television station in South Carolina: WHNS in Greenville, SC. It aired there on July 22, 1984, at a total cost of \$250. As noted at page 5, note 1, of NCC's and HFS's September 10, 1984, response to the complaint, NCC and HFS split the cost of that airing on a 50-50 basis because a substantial number of North Carolina voters watch WHNS (Greenville is near the border of North and South Carolina). That is the only instance of an airing outside North Carolina where NCC and HFS shared the cost of media time.

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COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N.W.
P.O. BOX 7566
WASHINGTON, D.C. 20044

Gary Johansen, Esq. Federal Election Commission 1325 K Street, N Sec. 7th Floor Washington, D.C. 20463

COVINGTON & BURLING 1201 PENNSYLVANIA AVENUE, N.W. P.O. BOX 7866 WASHINGTON, D.C. 20044



FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

December 28, 1984

Daniel A. Rowley, Esquire Covington and Burling 1201 Pennsylvania Avenue, N.W. P.O. Box 7566 Washington, D.C. 20044

RE: MUR 1748
National Congressional Club and
Carter Wrenn, as treasurer
Helms for Senate and
Mark L. Stephens, as treasurer

Dear Mr. Rowley:

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This is in reference to your letter dated December 18, 1984, requesting an extension of 20 days to respond to the Commission's questions. After considering the circumstances presented in your letter, the Commission has determined to grant you your requested extension. Accordingly, your response will be due on January 7, 1985.

If you have any questions, please contact Eric Kleinfeld, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele General Counsel

BY: Kenneth A. Gross

Associate General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

National Congressional Club and)
Carter Wrenn, as treasurer)
Helms for Senate and)
Mark L. Stephens, as treasurer)

MUR 1748

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of November 27, 1984, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions in MUR 1748:

- Find reason to believe that the National Congessional Club and Carter Wrenn, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).
- Find reason to believe that the Helms for Senate Committee and Mark L. Stephens, as treasurer, violated 2 U.S.C. § 441a(f).
- 3. Approve and authorize the sending of the questions to the National Congressional Club, as recommended in the FEC General Counsel's report dated November 13, 1984.
- 4. Approve and authorize the sending of the letter to respondents as recommended in the FEC General Counsel's report dated November 13, 1984.

Commissioners Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision; Commissioners Aikens and Elliott dissented.

Attest:

Date

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Marjorie W. Emmons Secretary of the Commission

Mayoue W. Emmens



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 5, 1984

Daniel A. Rowley
Covington & Burlington
1201 Pennsylvania Avenue, N.W.
P.O. Box 7566
Washington, D.C. 20044

RE: MUR 1748
National Congressional Club
and Carter Wrenn, as treasurer
Helms for Senate and
Mark L. Stephens, as treasurer

Dear Mr. Rowley:

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The Federal Election Commission notified your clients on August 6, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your client's explanation of this matter which was dated September 10, 1984.

Upon further review of the allegations contained in the complaint and information supplied by your clients, the Commission, on November 27, 1984, determined that there is reason to believe that the National Congressional Club violated 2 U.S.C. § 441a(a)(2)(A) and Helms for Senate violated 2 U.S.C. § 441a(f). You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Further, in connection with its investigation in this matter, the Commission requests that the National Congressional Club answer the enclosed questions. Please submit the response within ten days of your receipt of this notification. Statements should be submitted under oath.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against your client, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

Daniel A. Rowley Page 2 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 your client wishes the matter to be made public. If you have any questions, please contact Gary Johansen, the attorney assigned to this matter, at (202) 523-4143. Sincerely, Ellett Lee Ann Elliott Chairman 10 9 Enclosures Procedures Questions 0 2 0 0 OC.

Questions to Mational Congressional Club

On August 2, 1984, a complaint was filed with the Federal Election Commission against the National Congressional Club and Helms for Senate, the subject of which was an advertisement entitled by the Complainant "Americans for Reagan." A description of this advertisement was included with the complaint and is attached to these questions as Attachment A. All references in the questions to the television advertisement "Americans for Reagan" refer to the above mentioned advertisement.

- 1) What was the total cost of producing or making the television advertisement "Americans for Reagan?"
- 2) Was the production cost for the "Americans for Reagan" advertisement paid entirely by the National Congressional Club or did Helms for Senate also pay for part of the cost? If this cost was allocated between the National Congressional Club and Helms for Senate, please indicate the amount paid by each committee.
- 3) Mr. Wrenn states in his affidavit that the National Congressional Club purchased television time for the "Americans for Reagan" advertisement in cities which were not located in North Carolina. For each television station located outside

-2-North Carolina where television time was purchased to run "Americans for Reagan" list the following: 1) the name of the television station; 2) the city and state in which the television station is located; 3) the dates on which the advertisement was run; and 4) the cost of the television time. In answering this quetion, please identify each station located outside North Carolina where the station reaches a substantial number of North Carolina viewers and where the costs for television time were divided between the National Congressional LO Club and Helms for Senate. য 0 5 0 M 0 2 a

ATTACHMENT A

HEIMS TV AD (30 sec)-ABZUG/JACKSON/REAGAN

VIDEO BELLA ABZUG SPEAKING ON TELEVISION.

SUPER: ELLLA ABZUG RADICAL FEMINIST

[HELAS TURNS TV CHANNEL]

JESSE JACKSON SPEAKING ON TELEVISION. SUPER:

JESSE JACKSON RADICAL

ACTIVIST

00

[HELPS TURES OFF TV]

HELL'S AT DESK.

SUPER: U.S. SEN JESSE HELMS

FILM OF REAGAN BEFORE

CONGRESS.

STILL PICTURE OF REAGAN.

SUPER: THE NATIONAL CONGRESSIONAL CLUB

Paid for by the National

Congressional Club and the Helms for Senate Committee. Not authorized by any Presidential Candidate or Presidential Candidate's Committee.

AUDIO HEVALGE.

THERE'S CNLY ONE WAY FOR YOU TO MOVE, MR. REAGAN, AND THAT

IS TO MOVE OUT.

TO THE WHITE HOUSE, WE WILL JACKSON:

MARCH ON, MARCH ON

YOU KNOW, NIGHT AFTER NIGHT THE HELMS:

LIEERAL NEWS MEDIA TROT OUT PEOPLE LIKE THESE TO SPEAK FOR ALL AMERICA. AND TO UNDERMINE PRESIDENT REAGAN OF

COURSE. IT'S NOT RIGHT AND IT'S NOT FAIR BECAUSE RONALD REAGAN IS MAKING

THIS COUNTRY STRONG AGAIN.

ALL AMERICANS SHOULD SUPPORT

OUR PRESIDENT.

AMERICANS FOR REAGAN. A CAMPAIGN OF THE NATIONAL CONGRESSIONAL CLUE.

FINCE:



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Daniel A. Rowley
Covington & Burlington
1201 Pennsylvania Avenue, N.W.
P.O. Box 7566
Washington, D.C. 20044

RE: MUR 1748
National Congressional Club
and Carter Wrenn, as treasurer
Helms for Senate and
Mark L. Stephens, as treasurer

Dear Mr. Rowley:

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The Federal Election Commission notified your clients on August 6, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your client's explanation of this matter which was dated September 10, 1984.

Upon further review of the allegations contained in the complaint and information supplied by your clients, the Commission, on November 27, 1984, determined that there is reason to believe that the National Congressional Club violated 2 U.S.C. § 441a(a)(2)(A) and Helms for Senate violated 2 U.S.C. § 441a(f). You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Further, in connection with its investigation in this matter, the Commission requests that the National Congressional Club answer the enclosed questions. Please submit the response within ten days of your receipt of this notification. Statements should be submitted under oath.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against your client, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

Daniel A. Rowley Page 2 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 your client wishes the matter to be made public. If you have any questions, please contact Gary Johansen, the attorney assigned to this matter, at (202) 523-4143. Sincerely, Lee Ann Elliott Chairman Enclosures Procedures Questions 0 0 0 a

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

HE FEC

In the Matter of National Congressional Club and Carter Wrenn, as treasurer Helms for Senate and Mark L. Stephens, as treasurer

MUR 1748

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GENERAL COUNSEL'S REPORT

I. BACKGROUND

On August 2, 1984, David E. Price, Executive Director of the North Democratic Party ("Complainant"), filed a complaint (Attachment I) against the National Congressional Club and Carter Wrenn, as treasurer, ("NCC"), and Helms for Senate and Mark L. Stephens, as treasurer ("Helms Committee"). The Complainant states that NCC and the Helms Committee have jointly sponsored a television advertisement entitled "Americans for Reagan" in which Senator Helms appears. Although in the advertisement Senator Helms speaks on behalf of President Reagan, the complainant alleges that the content, scheduling, and media market of the advertisement demonstrate that Senator Helms is receiving the full and individual benefit of the advertisement. Since NCC's share of the cost of the advertisement exceeds \$5,000, Complainant alleges that NCC has violated 2 U.S.C. § 441a(a)(2)(A) by making an in-kind contribution to the Helms Committee which exceeds the contribution limits of 2 U.S.C. § 441a(a)(2)(A) and that the Helms Committee has violated 2 U.S.C. § 44la(f) by accepting such contribution.

A copy of the complaint was sent to NCC and the Helms

Committee on August 6, 1984. Respondents on August 13, 1984,

requested an extension of time until September 10, 1984, in which

to respond to the complaint. The extension of time was granted.

Further, Complainant states that Jefferson Marketing, Inc., is the media buyer for both the Helms Committee and NCC.

Complainant states that when Jefferson Marketing, Inc., purchased broadcast time for the television commercial it replaced or substituted previously scheduled Helms for Senate advertisements with "Americans for Reagan" advertisements.

Finally, Complainant states that NCC and the Helms Committee divided the cost of the advertisement on a 50/50 basis and that the cost to NCC exceeds \$5,000. Complainant alleges that since the Helms Committee received all of the benefit from the advertisement, NCC has made excessive in-kind contributions to the Helms Committee and the Helms Committee has received excessive in-kind contributions from NCC.

NCC responds that during the fall and winter of 1983-84, NCC produced 60-second and 30-second advertisements supporting the reelection of President Reagan and soliciting contributions to NCC to support conservative causes. Between July 11 and July 18, 1984, NCC decided to run one of the 30-second advertisements as part of its independent expenditure project supporting President Reagan. NCC decided that it would run the advertisement during the week of July 20-27, 1984. Because the decision to purchase time was made so close to the beginning of the running of the advertisement, there was some concern that not enough television time could be purchased so as to maximize the number of viewers. A decision was then made to utilize some of the time already booked by the Helms Committee for the month of July. Twenty six percent of the total time bought to run the

NCC states that together with the Helms Committee it purchased a total of \$61,005 of television time during the period of July 20-27, 1984. NCC and the Helms Committee paid for this

NCC states that even though the candidacy of Senator Helms was not mentioned during the advertisement, it was recognized that his appearance in the advertisement would be of some benefit to his campaign. NCC counsel advised NCC that to avoid a possible in-kind contribution by NCC to the Helms Committee, the Helms Committee should share the cost of running the advertisement in North Carolina with the Helms Committee. NCC states that it and the Helms Committee made a good faith effort to allocate the benefit to Senator Helms and determined that a reasonable allocation of the cost of running the commercial in North Carolina was 50/50.

NCC also states that it has run the advertisement in states other than North Carolina. If the advertisement was run on stations outside of North Carolina, but which reached a substantial number of North Carolina voters, the cost of running the advertisement was split 50-50. If run on stations outside of North Carolina where no North Carolina voters were reached, NCC paid for the full cost of running the advertisment.

2 U.S.C. § 441a(a)(2) prohibits a multicandidate political committee from making a contribution which exceeds \$5,000 to a principal campaign committee of a candidate. 2 U.S.C. \$ 441a(f) prohibits a political committee from knowingly accepting such a

11 C.F.R. § 106.1 states that expenditures made on behalf of more than one candidate shall be attributed to each candidate in proportion to, and shall be reported to reflect, the benefit reasonably expected to be derived.

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NCC and the Helms Committee assert that President Reagan was the primary focus of the advertisement, not Senator Helms. They state that the advertisement was not targeted solely at North Carolina viewers. 1/ They state that the advertisement does not mention the candidacy of Senator Helms nor does it ask viewers to vote for him or to contribute money to his campaign. Further, they differ with Complainant's allegation that Senator Helms had a continuous visual and vocal presence in the advertisement. Even so, NCC and the Helms Committee do not contend that Senator Helms' campaign received no benefit from the advertisement.

Thus, there is no controversy in this case that the advertisement benefitted Senator Helms in his election for U.S.

Although NCC states that it has run the advertisement in other areas of the county and Mr. Wrenn in his affidavit lists certain cities outside North Carolina in which the advertisement has run, NCC provides no information as to the total extent of this media campaign as it compares to the media campaign run in North Carolina, i.e. what was the amount of money expended for media buys in other areas of the county as compared to the amount expended in North Carolina. Nor does NCC explain why the advertisement appears to have been run so heavily in North Carolina.

Senate.2/ There also appears to be no controversy that the advertisement benefitted President Reagan. The issue centers around how much of the cost of the advertisement should be allocated to Senator Helms' campaign. Complainant charges that 50 percent of the cost is not a fair allocation. NCC and the Helms Committee counter that they made a good faith effort to allocate the respective benefits to Senator Helms and President Reagan3/, that the judgment of the parties as to what is reasonable should control in the usual case, and that a 50-50 allocation is in fact a reasonable allocation.

It appears that NCC's 50-50 allocation applies only to the costs of the media time buys. As for the cost of producing the advertisement, it appears that this cost was borne entirely by NCC. NCC does not indicate in its response nor is it possible to determine from a review of NCC's reports how much this cost was.

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^{2/} In AO 1982-56, the Commission ruled that under the right circumstances a candidate's appearance in an advertisement to support another candidate does not constitute any benefit at all to the endorsing candidate. In that situation a Congressman who was presently a candidate for reelection appeared in a series of 30-second television advertisements in which he endorsed an individual for county prosecutor. The Congressman's congressional district was located entirely within the boundaries of the county. The Congressman appeared in the advertisement for 7 seconds and his name was superimposed on the picture. The Commission noted that the purpose of the advertisement was to endorse and influence the election of the county prosecutor and that the text of the advertisement emphasized the election of the county prosecutor and did not reflect an intent to influence the Congressman's reelection. See also AO 1980-28.

^{3/} An allocation which would result in a greater in-kind contribution to Senator Helms by NCC would result in a smaller independent expenditure to President Reagan by NCC.

If the advertisement benefitted Senator Helms' campaign, the allocation amount should take into consideration both production costs and North Carolina media time buy costs. Since the amount of production costs are unknown, it is impossible to tell what percentage of the entire cost of the advertisement (production and media time buy) was attributed to Senator Helms. 4/ If the production costs were significant, the \$30,502.50 paid by Senator Helms could be significantly less than 50 percent of the total cost (production and media time buy). Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that NCC violated 2 U.S.C. § 44la(a)(2)(A) and the Helm's Committee violated 2 U.S.C. § 441a(f). This will allow the Commission to ask NCC and the Helms Committee questions directed at determining the cost of producing the advertisement and the extent the advertisement was run outside North Carolina. Accordingly, the Office of General Counsel also recommends that the Commission approve questions to be answered by NCC.

III. RECOMMENDATION

The Office of General Counsel recommends that the Commission:

1) find reason to believe that the National Congressional
Club and Carter Wrenn, as treasurer, violated 2 U.S.C.
\$ 44la(a)(2)(A);

^{4/} If the advertisement was run extensively outside North Carolina it could be argued that a majority of the production costs should be attributed to NCC.

- 2) find reason to believe that the Helms for Senate Committee and Mark L. Stephens, as treasurer, violated 2 U.S.C. 5 441a(f);
- 3) approve and authorize the sending of the attached questions to the National Congressional Club; and
- 4) approve and authorize the sending of the atached letter to respondents.

two. 13, 1984

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Kenneth A. Gross Associate General Counsel

Charles N. Steele General Sounsel

Attachments:

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I. Complaint

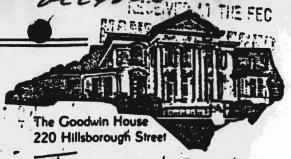
II. Response from NCC and the Helms Committee

III. Letter and Questions

The Democratic Party of North Carolina

Post Office Box 12196
Raleigh, North Carolina 27605-2196 • Telephone (919) 821-2777

July 26, 1984



Tape in Docket

Mr. Charles N. Steele General Counsel Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463 ATTACHMENT 1748 I O

Re: Federal Election Campaign Act Violations U.S. Senate Election, North Carolina

Dear Mr. Steele:

As Executive Director of the Democratic Party of North Carolina and as a registered voter of North Carolina, I am writing to report what I believe are continuing violations of the Federal Election Campaign Act by the Helms for Senate committee and the National Congressional Club. The violations arise from an "Americans for Reagan" television advertising campaign that is jointly sponsored by the National Congressional Club and the Helms for Senate committee. (See Attachment A). I believe the joint sponsorship of this advertising constitutes an illegal excessive contribution by the National Congressional Club to the Helms for Senate committee and an illegal receipt of an excessive contribution by the Helms for Senate committee.

Background

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The Helms for Senate committee is the principal campaign committee of Jesse Helms, the Republican candidate for election to the U.S. Senate from North Carolina. The National Congressional Club is a multi-candidate political committee that was formed by Jesse Helms and his supporters in 1973. (See Attachment B). From the formation of the National Congressional Club to the present, Jesse Helms has been instrumental in sustaining the National Congressional Club by acting as its honorary chairman and by signing or lending his name to numerous fundraising appeals on its behalf. Until 1979, the National Congressional Club was known as the North Carolina Congressional Club and focused its attention on North Carolina politics.

Oh July 20, 1984, the National Congressional Club and the Helms for Senate committee began airing a 30-second

Mr. Charles N. Steele July 26, 1984 Page Two

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television commercial in which Jesse Helms appears throughout the commercial to speak on behalf of President -Reagan (See Attachment A). The commercial begins by showing Jesse Helms as he views Bella Abzug and Jesse Jackson speaking on television and moves to Jesse Helms sitting at his desk speaking to the viewer. In the final seconds of the advertisement a brief film of Reagan before Congress and a still photograph of Reagan is shown as an announcer verbally identifies the National Congressional Club as a sponsor of the spot. Jesse Helms has a continuous visual or 'vocal presence in the advertisement until the final seconds of the commercial. Jesse Helms is the only person to speak directly to the viewer and he is identified while speaking to the viewing audience by superimposed letters reading: U.S. Senator Jesse Helms. No image or picture of Ronald Reagan appears until the very end of the advertisement.

Upon imformation and belief, this political commercial is being aired only on North Carolina broadcast stations or on broadcast stations which reach a North Carolina viewing audience. The broadcast market is the same market in which Jesse Helms is seeking election to the U.S. Senate.

Upon information and belief, the media buyer for both Helms for Senate and the National Congressional Club is Jefferson Marketing, Inc. When Jefferson Marketing, Inc. purchased broadcast time for this political advertisement, it replaced or substituted previously scheduled Helms for Senate ads with "Americans for Reagan" ads. (See Attachment C). Jefferson Marketing, Inc. purchase orders, check stubs and the station agreement forms all indicate that the advertising is placed on behalf of Helms for Senate. (See Attachments D, E, F, G, H, I, J, K, L, and M).

Upon information and belief, prior to the joint funding of this political advertisement, the National Congressional Club had contributed to the Helms for Senate committee the maximum amount permissible under the Federal Election Campaign Act. Upon information and belief, the total cost of this advertising campaign will greatly exceed the contribution limit of \$5,000.00. The National Congressional

Mr. Charles N. Steele July 26, 1984 Page Three

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Club and Helms for Senate are dividing the cost of the advertisement on a 50/50 basis.

The content, scheduling and media market of this political message demonstrates that Jesse Helms is receiving the full and undivided benefit from this jointly sponsored media campaign.

Illegal and Excessive Contributions

The term contribution is defined in 2 USC § 431(8)(A) of the Federal Election Campaign Act as:

any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.

The Act further provides in 2 USC §441a(a)(7)(B)(i) that:

expenditures made by any person in cooperation, consultation, or concert, with, or at the request or suggestion of, a candidate, his authorized political committees, or their agents, shall be considered to be a contribution to such candidate.

The Code of Federal Regulations adopted to implement the Act define "anything of value" in 11 CFR 100.7(a)(1)(iii) as:

(iii)(A) For purposes of 11 CFR
100.7(a)(1), the term "anything of value" includes
all in-kind contributions. Unless specifically
exempted under 11 CFR 100.7(b), the provision of
any goods or services without charge or at a
charge which is less than the usual and normal
charge for such goods or services is a
contribution. Examples of such goods or services
include, but are not limited to: securities,
facilities, equipment, supplies, personnel,
advertising services, membership lists, and

mailing lists. If goods, or services are provided at less than the usual and normal charge, the amount of the in-kind contribution is the difference between the usual and normal charge for the goods or services at the time of the contribution and the amount charged the political committee.

July 26, 1984 Page Four. '

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As a multi-candidate political committee, the National Congressional Club is prohibited from contributing anything of value over \$5,000.00 per election to a principal campaign committee of a candidate (Helms for Senate). 2 USC §441a(a)(2). Furthermore, it is unlawful for the Helms for Senate committee to knowingly accept anything of value over \$5,000.00 from the National Congressional Club. 2 USC §441a(f). The National Congressional Club and the Helms for Senate committee have coordinated this advertising campaign and the advertising costs paid by the National Congressional Club constitute excessive contributions to the Helms for Senate committee. 2 USC §441a(a)(7)(B), 2 USC §441a(f).

Aliocation of expenditures between candidates must be made in proportion to the benefit reasonably expected to be ""derived from the expenditures. 11 CFR 106.1.

The simple fact that Jesse Helms makes an appeal to support President Reagan belies an expectation of only a 50% benefit from the advertising. Advocating support for another candidate does not necessarily cut in half the benefit a candidate reasonably expects to receive from a political message. All the circumstances of the advertisement should be considered to determine what benefits a candidate can reasonably expect.

It is clearly evident that Helms for Senate expected the full benefit from the "Americans for Reagan" advertising because it allowed Jefferson Marketing to pull prescheduled Helms ads, the advertising is directed to the audience in the state in which Helms is a candidate, and Helms is the principal figure in the ads even though another candidate is mentioned. Any incidental benefit Ronald Reagan derives from this advertising does not diminish in any way the

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Mr. Charles N. Steele July 26, 1984 Page Five

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benefit to Helms. The Helms for Senate committee is receiving 30 seconds of political advertising in the North Carolina media market at half the usual and normal rate. The National Congressional Club's payment of one-half of the cost of the spot constitutes a benefit to the Helms for Senate campaign and the payment is an in-kind contribution in excess of the contribution limits. 2 USC §441a(a)(2). The Helms for Senate committee is knowingly participating in this joint advertising venture and has violated 2 USC §441a(f) by accepting unlawful excessive in-kind contributions from the National Congressional Club.

Relief Sought - Investigation and Sanction

In the General Counsel's Report in MUR 950, the General Counsel stated that although the Commission has never issued a per se bar to the establishment and maintenance of a multi-candidate committee by a candidate who has a functioning principal campaign committee, the multi-candidate committee cannot be used to benefit the principal campaign committee. (MUR 950, General Counsel's Report p. 4). The very activity proscribed by the General Counsel is occurring in the joint advertising campaign of the National Congressional Club and the Helms for Senate committee. The ask that the Commission take immediate measures to investigate and enjoin these violations of the Federal Election Campaign Act. I further request that the Commission advise the Helms for Senate committee and National Congressional Club that any continuing violations after this date will be considered willful and subject to appropriate sanctions.

I submit this letter under oath and pursuant to the provisions of 2 USC §437g(a)(1) as a formal complaint against the National Congressional Club and the Helms for Senate committee.

Mr. Charles N. Steele July 26, 1984 Page Six . .

"I would appreciate your immediate investigation of these matters.

Executive Director North Carolina Democratic Party

SWORN TO AND SUBSCRIBED before me this de day

My Commission Expires: 7.825,1985

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HELMS TV AD (30 sec) - ABZUG/JACKSON/REAGAN

- AUDIO

VIDEO
BELLA ABZUG SPEAKING
ON TELEVISION.
SUPER: ELLLA ABZUG
"" RADICAL FEMINIST
[HELAS TURNS TV CHANNEL]

THERE'S ONLY ONE WAY FOR YOU TO MOVE, MR. REAGAN, AND THAT IS TO MOVE OUT.

JESSE JACKSON SPEAKING ON THIEVISION. SUPER: JESSE JACKSON RADICAL ACTIVIST [HELDS TURES OFF TV] JACKSON: TO THE WHITE HOUSE, WE WILL MARCH ON, MARCH ON

HELMS AT DESK. SUPER: ',U.S. SLIN JESSE HELMS HELMS: YOU KNOW, NIGHT AFTER NIGHT THE
LIFERAL NEWS FEDIA TROT OUT PEOPLE
LIKE THESE TO SPEAK FOR ALL AMERICA.
AND TO UNDERMINE PRESIDENT REAGAN OF
COURSE. IT'S NOT RIGHT AND IT'S NOT
FAIR BECAUSE PONALD REAGAN IS MAKING
THIS COUNTRY STRONG AGAIN.

FILM OF PEACAN BEFORE CONGRESS.

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ALL AMERICANS SHOULD SUPPORT OUR PRESIDENT.

STILL PICTURE OF REAGAN. MANCR:
SUPER: THE NATIONAL
CONGRESSIONAL CLUB
Paid for by the National
Congressional Club and the Helms
for Senate Committee. Not authorized
by any Presidential Candidate or
Presidential Candidate's Committee.

ANNOR: AMERICANS FOR REAGAN. A CAMPAIGN OF THE NATIONAL CONGRESSIONAL CLUE.





Under the dom

Democrats consider challenge to Helms ad

North Carolina Democrats are studying a possible legal challenge to a television commercial sponsored by the National Congressional Club that prominently features Sen. Jesse A. Helms boosting the re-election of President Reagan.

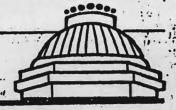
An aide to Gov. James B. Hunt Jr., who is challenging Helms for re-election, told Dome: Monday that the ad appears to be a way for the Congressional Club, to get around federal spending limits on contributions to Helms' campaign.

The political commercial, which began airing nationally last week, features film clips of Democratic presidential candidate the Rev. Jesse L. Jackson and former New, York Congresswoman Bella Abzug.

1. In the commercial, Helms tells

See BOME, page 6A

Under the dome



... Continued from page 1A

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reviewers that the liberal news a media trots out such figures as Jackson and Ms. Abzug every inight to attack Reagan. Their criticism isn't fair, Helms says, because the president is doing a legood job.

Claude A. Allen, press secretary
for the Helms campaign, said the
cost of the commercial was being
divided equally between the
Helms campaign and the National
Congressional Club, which he said
was making an independent expenditure on behalf of the Reagan
campaign. The Congressional
Club is a Raleigh-based conservative political action committee
founded by Helms and supporters
in 1973.

"It is a joint expenditure," said "Allen. "Each participant pays for the benefit they get out of it."

He declined to say how much the ad cost.

Democratic Party attorneys Monday were reviewing the commercial to determine if the Congressional Club was using it to subsidize the Helms campaign and bypass federal campaign contribution limits.

Will Marshall, press secretary for the Hunt campaign, said the Reagan-Helms commercial "in our view constitutes an illegal corporate contribution by the Congressional Club to the Helms campaign."

"It appears to us that Jesse Helms is trying to sneak money into his campaign and skirt election laws under the guise of showing his support for Ronald Reagan," Marshall said in an interview.

"The campaign attorneys are studying this apparent violation of state election laws, and we will certainly file a complaint if they believe one is warranted."

Federal election laws permit political committees to contribute a maximum of \$5,000 per election, or a total of \$10,000 counting primary and general election campaigns.

Marshall said the Congressional Club had contributed a total of \$4,500 to the Helms campaign, for both the primary and general election.

Allen said attorneys for the Helms campaign had reviewed the cost-sharing arrangement and believed it to be legal. He said the attorneys decided that a 50-50 split in financing the commercial was equitable.

ATTENTION TRAFFIC

Per our conversation on Wednesday, July 18, 1984, all previous HFS contracts (now Helms for Senate/National Congressional Club contracts) will run 100% AFR-1 on Friday, July 20 through Sunday, July 22, 1984.

On Monday, July 23, 1984, HFS 850-A will run on the original HFS contracts, and AFR-1 will run for the buy scheduled to run July 23-27, 1984.

If you have any questions concerning this rotation, please do not hesitate to call me at (919) 781-4824.

Thank you.

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JEFFERSON MARKETING, INC. P.O. BOX 19807 . RALEIGH, NORTH AROLINA 27619

PURPHASE DRIDER NO.

2623

THIS NUMBER MUST APPEAR ON ALL INVOICES. PACKAGES AND CORRE-SPONDENCE.

.ENDOR WRAL - TV

2619 Western Blvd. Raleigh, NC. 27605

Attention: Quinn Koontz

CLIENT BILL TO)

Jefferson Marketing, Inc. BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

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04 7-18-84 OUANTITY SHIPPED PLEASE SUPPLY	
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SHIP TO

CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS "CHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.





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This application, whether accepted or rejected, will be available for public inspection for a period of two years in accordance with FCC regulations (AM, Section 73.120, FM, Section 73.290, TV, Section 73.657).

JEFFERSON MARKETING INC. P. O. BOX 19867 RALEIGH, N. G. 27819

No

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July 18,

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DOLLARS

FIRST CITIZENS BANK
First Citizens Bank & Trust Company
Raleigh, N.C. 27602

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TERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11166 - To purchase TV time for Helms for Senate.	\$3357.50
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c	RECEIPT & AFFIDAVIT REQUESTED	
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JEFFERSON MARKFTING, INC. P.O. BOX 19807 • RALEIGH, NORTH PROLINA 27619

PURCHASEORDER

INVOICES, PACKAGES AND CORRE-

3045

ENDOR WRAL - TV 2619 Western Blvd. ' Raleigh, N.C. 27605

SHIP TQ

Attention: Quinn Koontz

CLIENT (BILL TO)

> Jefferson Marketing, Inc. arr i

BILL DIRECT TO THE CLIENT, BY ACCEPTING AND PULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

SPONDENCE.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

SE ORDER DATE DA	TE REQUIRED' - JOS NUMBE			OF ME QUIRED	-	ACCOUNT
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. CHANGES WILL BE BINDING ON CLIENT, LISTED ON THIS ACHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

LHamler

PURCHASING AGENT





TATION and LOCATION	WRAL-TV	1	Raleigh, N.C.	19_84
Jefferson Marke	ting, Inc.	(being)(on behalf of)U.S	. Senator Jess	e Helms
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United States	Senate			
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DATE OF FIRST BROADCAST	DATE OF L	AST BROADCAST		
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JEFFERSON MARKETING INC. P. O. BOX 19807 RALEIGH, N. C. 27618

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July 18

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DOLLARS

FIRST CITIZENS BANK
First Citizens Bank & Trust Company.
Raleigh, N.C. 27602

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EFFERSON MARKETING INC.

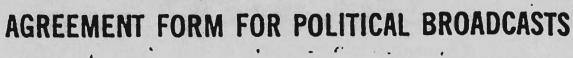
DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11110 - To purchase TV time for Helms for Senate.	£956.25
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	RECEIPT & AFFIDAVIT REQUESTED	







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Jefferson Market		(haring)		
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P.O. BOX 19807 . RALEIGH, NORTH CAROLINA 27619

SHIP TO

INVOICES, PAGRAGES AND CORNE-! RPONDÈNCE.



VENDOR WXII - TV 700 Coliseum Dr. Winston Salem, N.C. 27101 .

Attention: Zack Manning

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING IN-PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AT AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST TO ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLE RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF TO PURCHASE ORDER.

NO.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FE FORWARDING TO CLIENT.

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NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

SHIP TO

NO.



VENDOR

WXII - TV 700 Coliseum Dr. Winston Salem, N.C. 27106

Attention: Zack Manning

CLIENT (BILL TO)

Jefferson Marketing, Inc..

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PBILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING TO PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AN AGRIES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST I ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLI PROPRIEDLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF TO PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING F-FORWARDING TO CLIENT.

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NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

PURCHASING AGENT



July	18.	10	. 84

PAY TO THE ORDER OF _

WXII - TV

1190.00

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DOLLARS

FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

#60006152# 4:053100300:0861143935#

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11108 - To purchase TV time for Helms for Senate.	\$1190.00
6		
O	RECEIPT & AFFIDAVIT REQUESTED	
C	* A COLUMN TO THE STATE OF THE	



July	18	- 40	9/
		19	-04

PAY TO THE ORDER OF _

WXII - TV

1275.00

THE SUM I 275 DOLS O O CIS

DOLLARS

FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

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100006 208" 4:053 100 300 :086 1 14 3935"

DATE	DESCRIPTION	AMOUNT
× 7/18/84	PO #11160 - To purchase TV time for Helms for Senate/ Americans for Reagan. RECEIPT & AFFIDAVIT REQUESTED	\$1275.00





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AGREEMENT FORM FOR POLITICAL BROADCASTS

STATION and LOCATION .	WGHP-TV			High Poi	nt, N.	C4984
VE <u>Jefferson Market</u>	ing, Inc.	(being) ——(on behalf of	U.S.	Senator	Jesse	Helms
			11.01			1.51200
legally qualified candidate of	(the Republica	n political par	ty for the	office of _		
United States S	enate ·	1 1 1 1				
					7 41, 1	
n the	election to be he	ld on Novembe	r.1984	do hereby re	quest stat	ion time as
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- DENGTH OF BROADCAST	MOURDAYS-	- TIMES PER WI		-TOTAL NO. W	,	-HATE
		Rade Title				
1,						
DATE OF FIRST BROADCAST	DATE	OF LAST BROADCAST				
July 20, 1984-	July	27, 1984			\$3,23	0.00
			Tot	al Charges: _		-
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Mark Stephens, 7						
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This application, whether accepted or rejected, will be available for public inspection for a period of two years in accordance with FCC regulations (AM, Section 73.120; FM, Section 73.290; TV, Section 73.657).

WEFFERSON MARKETING, INC.

P.O. BOX 19807 . RALEIGH, N 'H CAROLINA 27619

SHIP

TO

NO.

: 895

FUHLHAUL UHUEHA

THE NUMBER LAIST AFFEAR ON ALL PHYDICES, PACKAGES AND COME-SPONDENCE.

VENDOR WGHP - TV 2005 Francis St. High Point, N.C. '27261

Attention: Charlie Davis

CLIENT (BILL TO)

Jefferson Marketing, Inc.

PILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THE PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

	DATE REQUIRED. JOS			PROOF REQUIRED	NO OF SAMPLES	ACCOUNT
7-18-84	7-18-84			8	REQUIRED	HFS
OFDERED SHIP	TO .	PLEASE SUPPL	LY ITEMS LISTED BELOW		UNIT PRICE	TOTAL
	Ads to a Sun. Fri. Sat/Sun Sun. Advertis	AFR-1 *Deferring July 6-6:30p 6-6:30p 12-2p 4-6p	evision time for ericans for Reagan ending Reagan TV Eyewitness TV Eyewitness Birtish Open Aspen Tennis	22, 1984 s News gross less 15% net	2 @ 325	200.00 425.00 650.00 350.00 1625.00 243.75 1381.25

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

Mille 9 PURCHASING AGENT



JEFFERSON MARKETING F. D. BOX 19807 RALEIGH S. HILLER

NC 27619

(herein referred to as "station")



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January	February	March	April	May.	June	
July 1'85	August '	September	October	November	December	Contract
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FFERSON r	MARKETING.		As Agent for	Amin. HOS F	HOZHELMS S	by
			As Agent for	Television Stati	on WGHP-TV	by



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HC 2/619

(herein referred to as "station")



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Advertiser

As Agent for AITER. FUR REG/HFLHS S

As Agent for Television Station WGHP-TV

terms and conditions on the reverse side of this page and any attachments hereto are an integral K

FFERSON MARKETING

resentative





Jefferson Marketing	, Inc. (being)	U.S. Senator Jesse Helms
legally qualified candidate of the	Republicar political pa	arty for the office of
United States Sena	te	
theellows:HO		er.1984do hereby request station time as
DATE OF FIRST BROADCAST	I DATE OF LAST BROADCAST	
July 20	July 22	Total Charges: \$459.00 net
Helms for Senate C	yment for the above-describe ommittee/ National C	to so describe that sponsor in your log and to
Helms for Senate C nounce the program as paid for by vidual person, is: () a corporation	yment for the above-describe committee/ National C y and you are authorized y such person or entity. The entity on: () a committee: () an asset	to so describe that sponsor in your log and to furnishing the payment, if other than an in occation, or () other unincomposited group
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This application, whether accepted or rejected, will be available for public inspection for a period of two years in accordance with FCC regulations (AM, Section 73.120; FM, Section 73.290; TV, Section 73.657).



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	LOCATION		4	19
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legally qualif	fied candidate of th	Republican	political party	for the office of
	d States Sena			
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n the	-	election to be held	on November.	1984do hereby request station time a
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LENGTHOF	BROADI AST			TOTAL NO WEEKS MATE_
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VENDOR

Phillips Ave & White St Greensboro, M.C. 27420

"Attention: Jost Sales

CLIENT. (BILL TO)

Jefferson Marketing,

BILL DIRECT, TO THE CLIENT. BY ACCEPTING AND PULPILLING THIS PURCHASE OFFICE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE OFFICE TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE OFFICE.

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This application, whether accepted or rejected, will be available for public inspection for a period of two years in accordance with FCC regulations (AM, Section 73.120; FM, Section 73.290; TV, Section 73.657).

Partial Summary of Schedule Ad Buys - "

Washington, NC WITN: July 23-July 27 July 20-July 32

Greenville, S. WINS: Thursday: bam, 6pm, 11:30 pm

Winston Salem, Wall: scheduled twice last weekend, but not ordered since

Wilmington, WCT: July 23-July 29 Fon-Fri, 7-9am Thu-Fri, 6pm Mon-Sun, 11:30 pm

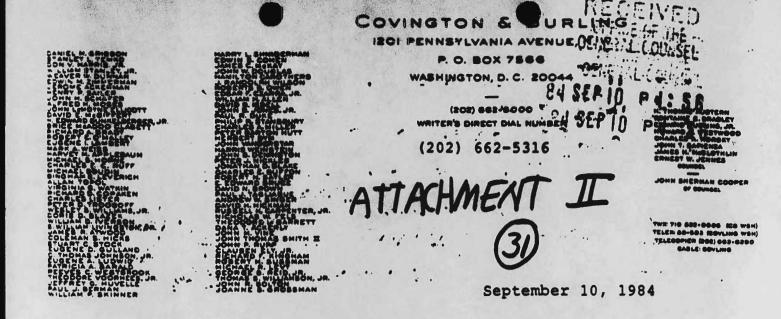
8 Wilmington, WAY: July 23-July 27 Mon-Fri, 7-9am Mon-Fri, 11:30-12am Tnu, Fri, 6-7pm Thu, Fri, 11-11:30

Asheville, WLOS Sceduled to run July 20-July 22, but did not appear

0 July 26-July 27, 5:55-5:57 July 23-July 27, 11:59pm-12:01 am July 21, British Cpen C July 23-July 27, Good Porning America July 21, Star Search
July 72, Star Search 0 or

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Charles N. Steele, Esq.
General Counsel
Federal Election Commission
Seventh Floor
1325 K Street; N.W.
Washington, DC 20463

Re: MUR 1748

Dear Mr. Steele:

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This. Letter is submitted on behalf of the National Congressional Club ("NCC") and the Helms for Senate Committee ("HFS") in response to the Democratic Party of North Carolina's complaint of July 26, 1984, in the above matter. The complaint alleges that NCC and HFS have violated the Federal Election Campaign Act ("FECA") in connection with an NCC advertisement supporting President Reagan's reelection in which Senator Helms appears. NCC and HFS have divided equally the cost of running this advertisement when North Carolina voters will view it. The complaint argues that HFS receives all of the benefit from the advertisement and that NCC accordingly has made illegal contributions to HFS to the extent its proportionate share of the cost exceeds \$5,000.

The Democratic Party's complaint, as shown below, is without basis both legally and factually. Where two political committees share the cost of an advertisement, the benefit each receives should be left to their assessment if reasonable. E.g., 11 C.F.R. § 106.1(a). Here, the only candidate mentioned is President Reagan. The advertisement does not mention the candidacy of Senator Helms. It does not ask viewers to vote for him

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br to contribute money to his campaign. Nonetheless, NCC and HFS concluded that Senator Helms receives some benefit when the advertisement runs in North Carolina. Following Commission regulation and precedents, upon advice of counsel NCC and HFS made a reasonable judgment to split the cost evenly, a judgment that should stand because there is no evidence to refute it.

The Democratic Party's factual premises are erroneous. President Reagan's campaign is not "incidental" to the advertisement. The primary focus of the advertisement is President Reagan, not Senator Helms. Similarly, the advertisement did not "replace" previously booked HFS television time. The total amount of television time paid for by HFS during the week in question increased as a direct result of the advertisement. Finally, the advertisement was not targeted solely at North Carolina viewers. It was developed by NCC as part of a national independent-expenditure project. Where it has run outside of North Carolina, NCC has paid the entire cost. Accordingly, the Commission should find no reason to believe that NCC or HFS have violated the FECA.

FACTS

NCC is a multi-candidate political committee registered with the Commission. HFS is the principal campaign committee of Senator Jèsse Helms. Contrary to the allegation in the Democratic Party's complaint, at p. 1, Senator Helms is no longer the honorary chairman of NCC. See Affidavit of Mr. R. E. Carter Wrenn, Executive Director of NCC, attached hereto as Exhibit A, at ¶ 2.

During the fall and winter of 1983-84, NCC decided to produce commercials raising the general issue of the fairness of media treatment of President Reagan. Some of these commercials urged support of President Reagan's reelection while others solicited contributions to NCC to support conservative causes generally. NCC produced both 60-second and 30-second commercials sounding those themes. No officials from HFS consulted with NCC in the production of these commercials. Id. ¶ 4.

NCC never ran the 60-second versions. Id. ¶ 5. During the summer of 1984 NCC decided to run one of the 30-second versions as part of its independent-expenditure project supporting President Reagan. Id.

The Democratic Party's characterization of this 30second commercial is inaccurate. The Democratic Party states

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that "the commercial begins by showing Jesse Helms as he views Bella Abzug and Jesse Jackson speaking on television Jesse Helms has a continuous visual or vocal presence in the advertisement until the final seconds of the commercial." Complaint at 2. However, when Ms. Abzug and Mr. Jackson are shown on a television set, Senator Helms does not appear. The first 10 seconds of the commercial show only the television set. A hand reaches in from the right of the screen and turns the channel. Only after about 10 seconds does the camera pull back and show Senator Helms watching the television set. Id. ¶ 6.

For the next 10 seconds, Senator Helms is seen sitting at a desk urging Americans to support the reelection of President Reagan. He is identified by a superimposed statement that he is U.S. Senator Jesse Helms. In the next 5 seconds, Senator Helms continues speaking while photographs of President Reagan are shown. The last 5 seconds show photographs of President Reagan and a voice-over (not Senator Helms) urging Americans to vote for President Reagan and identifying the advertisement as a production of NCC's independent-expenditure project. At no time does the commercial refer to the candidacy of Senator Helms, nor does it urge viewers to vote for Senator Helms or solicit contributions on his behalf. See id. TT 4, 6.

'MCC decided that it would run the advertisement during the week of July 20-27, 1984. NCC realized that even though the candidacy of Senator Helms was not mentioned during the advertisement, his appearance in it in North Carolina would be of some benefit to his reelection campaign. After consultation with counsel, NCC Anformed HFS that to avoid an in-kind contribution by NCC to. HFS it would be necessary for HFS to share the cost of running the advertisement in North Carolina. HFS agreed to this course of action, and on the advice of counsel it was determined to divide the cost of running the advertisement in North Carolina evenly between NCC and HFS. Id. ¶ 7...

Although Senator Helms is either seen or heard for one-half of the commercial, the determination to split the cost evenly was not based solely on that fact. NCC and HFS recognized that it was extremely difficult to allocate the benefit between NCC's independent expenditure project and Senator Helms' reelection effort. The commercial consistently speaks of President Reagan throughout, and it does not urge support of Senator Helms. On the other hand, there is general public awareness in North

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Carolina that Senator Helms is a candidate for reelection. Accordingly, on advice of counsel they determined that a reasonable allocation of the cost of running the commercial in North Carolina was fifty-fifty. Id. 98.

NCC and HFS jointly purchased a total of \$61,005 of television time during the period July 20-27. They each paid \$30,502.50. Id. T 10. The decision to buy this time was made between July 11 and July 18. The time was not chosen to target a particular demographic group, but rather was designed to reach the greatest possible number of people based on rating points.1/Id. T 11.

Because the decision to purchase time was made so close to the beginning of the running of the commercial (July 20), there was some concern on the part of NCC and HFS that they would not be able to purchase time so as to maximize the number of viewers. NCC and HFS therefore decided to utilize some time already booked by HFS for the month of July. Earlier in July, HFS had purchased \$157,710 of media time for mid-July to mid-August. NCC and HFS used \$15,955 of this time for their joint advertisement. This ensured that the advertisement would get sufficient rating points. Id. ¶ 12.

The \$1,005 of advertising purchased jointly by NCC and HFS was not an exact substitute for the time HFS would have had under its prior purchase orders for several reasons. First, only 26 percent of the total time bought jointly by NCC and HFS was previously booked HFS time. Second, other time booked by HFS pursuant to its \$157,710 purchase was used by it alone during the week of July 20-27. Third, only \$15,955 of previously booked HFS time was utilized for the HFS/NCC effort, while HFS paid \$30,502.50 for joint advertising. Thus HFS increased its advertising during the week of July 20-27 by \$14,547.50. Id. ¶ 13.

Finally, as noted, the advertisement that is the subject of the complaint was produced in various versions by NCC in the fall and winter of 1983-84 both to support President Reagan

^{1/} Rating points are an arbitrary value put on a program based on the number of viewers projected to watch it. The projection is done through some type of polling. An example is the Arbitron system.

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and to solicit contributions to NCC. NCC determined that it would utilize one of the 30-second versions of the advertisement for its Americans for Reagan independent-expenditure project. Pursuant to that project, NCC has run the advertisement in other states: Because Senator Helms is not running for reelection in those states, NCC pays the full media cost of those airings of the advertisement. Id. ¶ 16.1/

'ARGUMENT

Although the Democratic Party gives an elaborate overview of the Commission's regulations and FECA, Complaint at 3-4, it only cursorily notes that allocation of expenditures between candidates "must be made in proportion to the benefit reasonably expected to be derived from the expenditures. 11 C.F.R. 106.1. Complaint at 4. The Democratic Party understandably does not dwell on this citation nor expand its discussion of this point, for relevant Commission precedent makes clear that the judgment of the parties as to what is reasonable should control in the usual case. . See, e.g., 11 C.F.R. § 106.1(a); A.O. 1982-56; Explanation and Justification of Part 106, CCH Fed. Elec. Camp. Fin. Guide ¶ 805.

It could not be otherwise. In most cases where one candidate' appears in an advertisement to support another candidate, it is very difficult to ascertain how much benefit each will receive from the advertisement. The time each appears on camera or is mentioned clearly cannot be used as a hard and fast rule. Even a brief appearance can be of significant benefit to an endorsing candidate. On the other hand, where the endorsing

The complaint notes that the advertisement has run in South Carolina; and the cost of such advertisements has been split jointly between NCC and HFS. The station in question reaches a substantial number of North Carolina viewers because it is on the North Carolina border. Out of prudence HFS and NCC have split the cost of running the advertisement there. Exhibit A ¶ 16. other states where the station's signal does not reach North Carolina voters, NCC pays the total amount of running the advertisement. Id.

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candidate's candidacy is not mentioned but he merely states support of the other candidate, it is at times unclear if the endorsing candidate receives any benefit at all. In some instances the Commission has ruled that a candidate's appearance in a commercial to support another candidate does not constitute any benefit at all to the endorsing candidate. E.g., A.O. 1982-56; 1980-28.

This case is a good illustration of why the reasonableness determination should be left to the parties involved. Senator Helms only appears for one-half of the time the commercial is aired. No mention is made of his candidacy nor are viewers asked to vote for him or to contribute to his campaign. The entire 30 seconds are spent talking about President Reagan and his programs and is designed to promote his reelection to office.

Nonetheless, Senator Helms surely receives a benefit with North Carolina voters by being associated with President Reagan and his policies. It would be disingenuous to suggest he does not. But, once that is recognized, no easy formula presents itself. The Commission's regulations offer no bright-line guidance but rather refer only to "reasonableness." Should the allocation be based on the time devoted to each, the prominence of the use of each's name, the putative psychological effect on North Carolina voters, or some other method? Recognizing these difficulties, and after consulting, counsel, NCC and HFS made a good-faith effort to allocate the respective benefits. A fifty-fifty allocation thus is reasonable under the circumstances as a matter of law.

The Democratic Party attempts to overcome this fact and 'argue that the benefit to President Reagan from the commercial is only incidental by pointing to three factors. See Complaint at 4. First, the Democratic Party states that HFS "expected the full benefit from the 'Americans for Reagan' advertising because it allowed [its media time buyer] to pull prescheduled Helms ads . . . " It is unclear exactly what the Democratic Party means by this statement. It may be that the Democratic Party believes that the times at which the advertisement ran are periods that are peculiarly forceful only with respect to Helms supporters but not Reagan supporters. (One would imagine that in many instances the two audiences substantially overlap.) The invoices attached to the complaint show, however, that such is not the case. For example, in the invoices for the four stations attached to the complaint, in each instance the advertisement ran during at least one of the network's 7-9 a.m. news shows. That hardly is a time peculiarly of advantage to Senator Helms. The reason for this is COVINGTON & BURLING

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Charles N. Steele, Esq. Page 7
September 10, 1984



simple. When HFS bought the time in question, it did not target particular demographic groups. Instead, its goal was to reach the largest number of voters as possible based on ratings. The same goal was followed for the HFS/NCC joint effort -- and is standard procedure for political committees. Exhibit A ¶ 15.

In any event, the advertisement was not simply substituted for previously booked HFS time. Only about 25 percent of the time utilized for the advertisement was formerly booked for HFS. The total amount of HFS payments for time during this period increased, and the commercial here was not the only HFS advertisement running during this period.

Second, the Democratic Party argues that the advertisement has run only in North Carolina and thus is directed only at North Carolina voters. Complaint at 4. In the first place, this in no way diminishes the fact that North Carolina voters also will have an opportunity in November to vote for President Reagan. The Democratic Party nowhere explains why appeals to reelect President Reagan will not be taken for just that. Moreover, NCC has continued to run the advertisement in other states as part of its independent-expenditure project and expects to continue to do so until the election. Where the advertisement runs on stations that do not reach North Carolina voters, NCC pays for the full cost.

Finally, the Democratic Party contends that Senator Helms is the "principal figure in the ads even though another candidate is mentioned." Complaint at 4. This distorts the commercial. For the first 10 seconds, Senator Helms does not appear; only President Reagan is mentioned. For the next 15 seconds, Senator Helms is seen or his voice is heard, but his candidacy is not mentioned. The only thing Senator Helms talks about for these 15 seconds is the need to support President Reagan and his policies. The final 5 seconds of the commercial show pictures of President Reagan and a voice-over (not Senator Helms) urging voters to support President Reagan. Under these circumstances, it is hard to understand how President Reagan's role in the commercials is "incidental." Complaint at 4.

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Charles N. Steele, Esq. Page 8 September 10, 1984



CONCLUSION

The Commission should find no reason to believe that NCC or HFS violated the FECA and should dismiss the complaint in this matter.

Brice M. Clayett

John R. Bolton

Daniel A. Rowley

Covington & Burling 1201 Pennsylvania Ave., N.W. P.O. Box 7566 Washington, DC 20044 (202) 662-6000

GCC# 4645 COVINGTON & BURLING 1201 PENNSYLVANIA AVENUE, N. W. P. O. BOX 7566 WASHINGTON, D. C. 20044 TELEPHONE TWX 710 822-0005 (C8 WSIQ , TELEM 89 893 (COVLING WEN) (202) 662-6000 TELECOPIERI (202) 662-6290 WRITER'S DIRECT DIAL NUMBER (202) 662-5344September 11, 1984 Charles N. Steele, Esq. General Counsel Federal Election Commission 7th Floor 1325 K Street, N.W. Washington, DC 20463 Re: MUR 1748 Dear Mr. Steele: As noted in my letter to you yesterday, an executed copy of the affidavit accompanying the response to the complaint in the above matter was unavailable. Enlcosed is an executed copy of the affidavit, which is identical to the affidavit filed Sincerely, C Daniel A. Rowley CC Enclosure

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

HELMS FOR SENATE COMMITTEE and NATIONAL CONGRESSIONAL CLUB

MUR 1748

AFFIDAVIT OF R.E. CARTER WRENN, EXECUTIVE DIRECTOR, NATIONAL CONGRESSIONAL CLUB

R.E. Carter Wrenn, having been duly sworn, states as follows:

- 1. I am the Executive Director of the National Congressional Club ("NCC"), a position I have held since 1979. The NCC is a multicandidate political committee registered with the Federal Election Commission ("FEC").
- 2. _ I have read the complaint dated July 26, 1984, filed with the FEC by the Democratic Party of North Carolina, entitled MUR 1748 by the FEC. The complaint refers to an advertisement supporting the reelection of President Reagan in which Senator Jesse Helms appears. As the complaint notes, the cost of running the advertisement in North Carolina during the week of July 20-27 was split evenly between NCC and the Helms for Senate Committee ("HFS"). HFS is the principal campaign committee for Senator Helms' reelection effort in North Carolina. Senator Helms no longer is the honorary chairman of NCC.

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- 3. After reading the complaint, I examined, or had examined under my direction, the records of NCC relating to this advertisement and have discussed this matter with officials of HFS and employees of NCC and the media time buyer for the running of the advertisement that week. Based on that investigation, and my own recollection of events, I have ascertained the following with respect to the complaint's allegations.
- During the fall and winter of 1983-84, NCC decided to produce commercials criticizing the media's treatment of President Reagan and his policies. We obtained film clips of individuals speaking at the March on Washington in the summer of 1983. We then put together 60-second and 30-second advertisements. Some of these commercials urged President Reagan's reelection while others asked viewers to send money to NCC and thereby support conservative causes generally. One of these 30-second commercials is the one referred to in the complaint. The first 10 seconds show a television set with Bella Abzug and Jesse Jackson speaking at the March on Washington. The camera then pans back and shows for 10 seconds Senator Helms seated at a desk speaking about President Reagan and the need to support his policies. last 10 seconds show photographs of President Reagan. For 5 of these last 10 seconds, Senator Helms continues speaking. final 5 seconds utilizes a voice-over (not Senator Helms) urging President Reagan's reelection.

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- 5. NCC never ran any of these 60-second commercials. Instead, during the summer of 1984 we decided to use one of the 30-second versions in NCC's independent-expenditure project advocating the reelection of President Reagan from July 20-27.
- attached as Exhibit A to the Democratic Party's complaint. It is accurate except where it implies that during the first 10 seconds Senator Helms can be seen watching the television set. A similar misstatement appears at page 2 of the complaint. All that is seen during the first 10 seconds is a television set and an unidentified hand that reaches in from the right and changes the television channel. Senator Helms does not appear until the camera pans back to show him seated at his desk approximately 10 seconds into the commercial.

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7. After we decided to run the 30-second advertisement as part of our independent-expenditure project, we realized that Genator Helms, campaign would receive some benefit when the advertisement ran in North Carolina even though his candidacy was not mentioned and the viewers were not urged to vote for him or send money to his campaign. After discussing the matter with counsel, we discussed this with HFS officials and determined that it was willing to bear part of the cost of running the advertisement in North Carolina. On advice of counsel, NCC and HFS decided that a fifty-fifty split of the cost in North Carolina was a reasonable allocation of the benefits we each would receive.

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- on the fact that Senator Helms only appears during half of the commercial. Rather, we and HFS recognized that it was very difficult to make any precise allocation. The entire commercial is devoted to support for President Reagan. He is the only person mentioned as a candidate. Senator Helms' candidacy is not mentioned, and viewers are not asked to vote for him or to contribute money to his campaign. Nonetheless, Senator Helms undeniably received some benefit with respect to North Carolina voters by being associated with President Reagan and his policies. Based on all these facts, we and HFS decided that a fifty-fifty allocation was reasonable in the circumstances.
- 9. I have reviewed Exhibits D through L of the complaint. These constitute purchase orders, political broadcast statements, and checks with respect to the running of the advertisement in North Carolina from July 20-27. Exhibits D through L only cover four stations: (1) Exhibits D-I, WRAL; (2) Exhibit J, WXII; (3) Exhibit K, WGHP; and (4) Exhibit L, WFMY. Exhibit M is, as it states, a "partial summary" of the schedule of advertising. It lists seven stations on which the advertisement ran during the week July 20-27.
 - 10. The advertisement ran on 21 television stations in six markets during this period. The total cost for these advertisements was \$61,005. NCC and HFS each paid \$30,502.50.



- 11. The goal in buying this amount of time was not to target particular voters but rather to reach the largest number of viewers possible. The simplest way to do that (and a common way of purchasing media time) is to buy time so as to ensure a certain number of rating points. The higher the number of rating points, the more people view the commercial. For example, in this project we set an aggregate goal of 1,600 rating points for all six markets.
- 12. The decision to run the advertisements on July 20-27 was made over the course of a week from July 11 to July 18. Because some of the decisions were not finalized until Wednesday, July 18, NCC had some concern that we would not achieve our goal of 1,600 rating points. HFS informed us that, as is its standard practice, it had booked \$157,510 of advertising time for mid-July to mid-August. We recognized that we could achieve our goal by utilizing in part this previously booked HFS time. Accordingly, we used \$15,955 of previously booked HFS time to air the commercial that is the subject of the complaint.

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13. This \$15,955 of HFS time does not represent a simple replacement of the joint advertisement for HFS advertisements. HFS's share of the total cost of the joint project was \$30,502.50. HFS thus bore the cost of an additional \$14,547.50 of advertising. In addition, originally scheduled HFS time during this period also was used by it for its own advertisements.

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which the advertisement ran were particularly geared to supporting only Senator Helms and not President Reagan. As noted, in purchasing the time we did not focus on particular demographic groups. That fact is shown, for example, by Exhibit D to the complaint. It notes that the advertisement ran on WRAL in Raleigh during Good Morning America, a baseball game, and a network movie. The same is true in WGHP-TV in High Point (Exhibit K). There the advertisement ran during the evening Eye Witness News, the British Open Golf Tournament, and a tennis tournament.

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16. Finally, NCC has continued to run the same advertisement outside of North Carolina as part of its independent-expenditure project. For example, we purchased time for it in the following cities recently: Allentown, PA; West Palm Beach, FL; Phoenix, AZ; Annaheim, CA; and Houston and Dallas TX. NCC presently plans to continue this. Where no North Carolina viewers see the commercial, NCC pays the entire cost. Where the station does reach a substantial number of North Carolina viewers (e.g., South Carolina), we split the cost with HFS.



The foregoing facts are true and correct to the best of my knowledge and belief and are made in good faith.

R.E. Carter Wrenn

Subscribed and sworn to before me this 10 day of September, 1984.

Notary Public

My Commission expires: 4-27-86

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ATTACRMENT III



FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

48

Daniel A. Rowley
Covington & Burlington
1201 Pennsylvania Avenue, N.W.
P.O. Box 7566
Washington, D.C. 20044

RE: MUR 1748
National Congressional Club
and Carter Wrenn, as treasurer
Helms for Senate and
Mark L. Stephens, as treasurer

Dear Mr. Rowley:

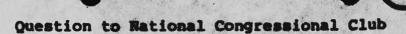
The Federal Election Commission notified your clients on August 6, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your client's explanation of this matter which was dated September 10, 1984.

Upon further review of the allegations contained in the complaint and information supplied by your clients, the Commission, on , 1984, determined that there is reason to believe that the National Congressional Club violated 2 U.S.C. § 441a(a)(2)(A) and Helms for Senate violated 2 U.S.C. § 441a(f). You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Further, in connection with its investigation in this matter, the Commission requests that the National Congressional Club answer the enclosed questions. Please submit the response within ten days of your receipt of this notification. Statements should be submitted under oath.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against your client, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

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Daniel A. Rowley Page 2 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 your client wishes the matter to be made public. If you have any questions, please contact Gary Johansen, the attorney assigned to this matter, at (202) 523-4143. Sincerely, Enclosures Procedures Questions 0 9 œ



On August 2, 1984, a complaint was filed with the Federal Election Commission against the National Congressional Club and Helms for Senate, the subject of which was an advertisement entitled by the Complainant "Americans for Reagan." A description of this advertisement was included with the complaint and is attached to these questions as Attachment A. All references in the questions to the television advertisement "Americans for Reagan" refer to the above mentioned advertisement.

- 1) What was the total cost of producing or making the television advertisement "Americans for Reagan?"
- 2) Was the production cost for the "Americans for Reagan" advertisement paid entirely by the National Congressional Club or did Helms for Senate also pay for part of the cost? If this cost was allocated between the National Congressional Club and Helms for Senate, please indicate the amount paid by each committee.
- 3) Mr. Wrenn states in his affidavit that the National Congressional Club purchased television time for the "Americans for Reagan" advertisement in cities which were not located in North Carolina. For each television station located outside



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North Carolina where television time was purchased to run "Americans for Reagan" list the following:

- 1) the name of the television station;
- 2) the city and state in which the television station is located:
- 3) the dates on which the advertisement was run; and
- 4) the cost of the television time.

In answering this quetion, please identify each station located outside North Carolina where the station reaches a substantial number of North Carolina viewers and where the costs for television time were divided between the National Congressional Club and Helms for Senate.

GCC# 4645 COVINGTON & BURLING 1201 PENNSYLVANIA AVENUE, N. W. P. O. BOX 7566 WASHINGTON, D. C. 20044 TWX: 710 822-0005 (CB WSIG TELEPHONE TELEM 88 583 (COVLING WSH) (202) 662-6000 TELECOPIER: (202) 662-6290 WRITER'S DIRECT DIAL NUMBER CABLE! COVLING (202) 662-5344 September 11, 1984 BY HAND Charles N. Steele, Esq. General Counsel Federal Election Commission 7th Floor 1325 K Street, N.W. Washington, DC 20463 MUR 1748 Re: Dear Mr. Steele: As noted in my letter to you yesterday, an executed copy of the affidavit accompanying the response to the complaint 7 in the above matter was unavailable. Enlcosed is an executed copy of the affidavit, which is identical to the affidavit filed yesterday. C Sincerely, C 0 Daniel A. Rowley OC Enclosure

In the Matter of HELMS FOR SENATE COMMITTEE and NATIONAL CONGRESSIONAL CLUB AFFIDAVIT OF R.E. CARTER WRENN, EXECUTIVE DIRECTOR, NATIONAL CONGRESSIONAL CLUB R.E. Carter Wrenn, having been duly sworn, states as follows: 1. I am the Executive Director of the National Con-

1. I am the Executive Director of the National Congressional Club ("NCC"), a position I have held since 1979. The NCC is a multicandidate political committee registered with the Federal Election Commission ("FEC").

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3. After reading the complaint, I examined, or had examined under my direction, the records of NCC relating to this advertisement and have discussed this matter with officials of HFS and employees of NCC and the media time buyer for the running of the advertisement that week. Based on that investigation, and my own recollection of events, I have ascertained the following with respect to the complaint's allegations.

During the fall and winter of 1983-84, NCC decided to produce commercials criticizing the media's treatment of President Reagan and his policies. We obtained film clips of individuals speaking at the March on Washington in the summer of 1983. We then put together 60-second and 30-second advertisements. Some of these commercials urged President Reagan's reelection while others asked viewers to send money to NCC and thereby support conservative causes generally. One of these 30-second commercials is the one referred to in the complaint. The first 10 seconds show a television set with Bella Abzug and Jesse Jackson speaking at the March on Washington. The camera then pans back and shows for 10 seconds Senator Helms seated at a desk speaking about President Reagan and the need to support his policies. last 10 seconds show photographs of President Reagan. For 5 of these last 10 seconds, Senator Helms continues speaking. The final 5 seconds utilizes a voice-over (not Senator Helms) urging President Reagan's reelection.

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5. NCC never ran any of these 60-second commercials. Instead, during the summer of 1984 we decided to use one of the 30-second versions in NCC's independent-expenditure project advocating the reelection of President Reagan from July 20-27. I have reviewed the transcript of this commercial attached as Exhibit A to the Democratic Party's complaint. It is accurate except where it implies that during the first 10 seconds Senator Helms can be seen watching the television set. A similar misstatement appears at page 2 of the complaint. All that is seen during the first 10 seconds is a television set and an uni-15 dentified hand that reaches in from the right and changes the 2 television channel. Senator Helms does not appear until the camera pans back to show him seated at his desk approximately 10 0 seconds into the commercial. After we decided to run the 30-second advertisement 7. 0 as part of our independent-expenditure project, we realized that N Senator Helms' campaign would receive some benefit when the adver-C .0 tisement ran in North Carolina even though his candidacy was not oc mentioned and the viewers were not urged to vote for him or send money to his campaign. After discussing the matter with counsel, we discussed this with HFS officials and determined that it was willing to bear part of the cost of running the advertisement in North Carolina. On advice of counsel, NCC and HFS decided that a fifty-fifty split of the cost in North Carolina was a reasonable allocation of the benefits we each would receive.

This fifty-fifty allocation was not based solely on the fact that Senator Helms only appears during half of the

commercial. Rather, we and HFS recognized that it was very difficult to make any precise allocation. The entire commercial is devoted to support for President Reagan. He is the only person mentioned as a candidate. Senator Helms' candidacy is not mentioned, and viewers are not asked to vote for him or to contribute money to his campaign. Nonetheless, Senator Helms undeniably received some benefit with respect to North Carolina voters by being associated with President Reagan and his policies. Based on all these facts, we and HFS decided that a fifty-

fifty allocation was reasonable in the circumstances.

- 9. I have reviewed Exhibits D through L of the complaint. These constitute purchase orders, political broadcast statements, and checks with respect to the running of the advertisement in North Carolina from July 20-27. Exhibits D through L only cover four stations: (1) Exhibits D-I, WRAL; (2) Exhibit J, WXII; (3) Exhibit K, WGHP; and (4) Exhibit L, WFMY. Exhibit M is, as it states, a "partial summary" of the schedule of advertising. It lists seven stations on which the advertisement ran during the week July 20-27.
- 10. The advertisement ran on 21 television stations in six markets during this period. The total cost for these advertisements was \$61,005. NCC and HFS each paid \$30,502.50.

The goal in buying this amount of time was not to target particular voters but rather to reach the largest number of viewers possible. The simplest way to do that (and a common way of purchasing media time) is to buy time so as to ensure a certain number of rating points. The higher the number of rating points, the more people view the commercial. For example, in this project we set an aggregate goal of 1,600 rating points for all six markets. 12. The decision to run the advertisements on July 20-27 was made over the course of a week from July 11 to July 18. 10 Because some of the decisions were not finalized until Wednesday, 5 July 18, NCC had some concern that we would not achieve our goal of 1,600 rating points. HFS informed us that, as is its standard practice, it had booked \$157,510 of advertising time for mid-July to mid-August. We recognized that we could achieve our goal by 0 utilizing in part this previously booked HFS time. Accordingly, ~ we used \$15,955 of previously booked HFS time to air the commer-0 5 cial that is the subject of the complaint. OC. 13. This \$15,955 of HFS time does not represent a simple replacement of the joint advertisement for HFS advertisements. HFS's share of the total cost of the joint project was \$30,502.50. HFS thus bore the cost of an additional \$14,547.50 of advertising. In addition, originally scheduled HFS time during this period also was used by it for its own advertisements.

- 6 -

a notice sent by our media time buyer to one of the stations running the advertisement. Exhibit C indicates that on July 18 our media time buyer talked to people at the station. Exhibit C instructs the station that on July 20-22 previously scheduled HFS time would be used for the commercial here. Exhibit C then notes that an originally scheduled HFS commercial entitled HFS 850-A "will run on the original HFS contracts, and AFR-1 [the advertisement that is the subject of the complaint] will run for the buy [of NCC and HFS] scheduled to run July 23-27, 1984." Thus Exhibit C shows that our advertisement was substituted for HFS commercials during the period July 20-22. However, from July 23-27, HFS and NCC jointly paid for the running of this advertisement, while HFS's own commercials also ran during that period as had previously been scheduled.

which the advertisement ran were particularly geared to supporting only Senator Helms and not President Reagan. As noted, in purchasing the time we did not focus on particular demographic groups. That fact is shown, for example, by Exhibit D to the complaint. It notes that the advertisement ran on WRAL in Raleigh during Good Morning America, a baseball game, and a network movie. The same is true in WGHP-TV in High Point (Exhibit K). There the advertisement ran during the evening Eye Witness News, the British Open Golf Tournament, and a tennis tournament.

16. Finally, NCC has continued to run the same advertisement outside of North Carolina as part of its independent-expenditure project. For example, we purchased time for it in the following cities recently: Allentown, PA; West Palm Beach, FL; Phoenix, AZ; Annaheim, CA; and Houston and Dallas TX. NCC presently plans to continue this. Where no North Carolina viewers see the commercial, NCC pays the entire cost. Where the station does reach a substantial number of North Carolina viewers (e.g., South Carolina), we split the cost with HFS.

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The foregoing facts are true and correct to the best of my knowledge and belief and are made in good faith.

R.E. Carter Wrenn

Subscribed and sworn to before me this 10 day of September, 1984.

Notary Public

My Commission expires: 4-27-86

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COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

TELEPHONE (202) 662-6000

WRITER'S DIRECT DIAL NUMBER

(202) 662-5344

TWX 710 822-0008 (CB WSH)
TELEX 89 593 (COVLING WSH)
TELECOPIER: (202) 662-6290
CABLE: COVLING

September 10, 1984

BY HAND

Charles N. Steele, Esq. General Counsel Federal Election Commission 7th Floor 1325 K Street, N.W. Washington, DC 20463

179

Re: MUR 1503

Dear Mr. Steele:

Enclosed is a response to the complaint in the above matter. Due to delay, an executed copy of the affidavit did not arrive in Washington in time to include it. We will file a copy of the executed affidavit, which is exactly the same as the enclosed, tomorrow.

Sincerely,

Daniel A. Rowley

Enclosure

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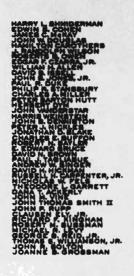
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.. (A) (CANIEL M. GRIBBON
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COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE & WORL COUNCE

P. O. BOX 7566

WASHINGTON, D. C. 20044

(202) 662-5316

WRITER'S DIRECT DIAL NUMBER

(202) 662-5316

WRITER'S DIRECT DIAL NUMBER

(202) 662-5316

WRITER'S DIRECT DIAL NUMBER

(203) 662-5316

WRITER'S WITER'S
TWX: 710 682-0005 (CS WSH)
TELEX: 68-383 (COVLING WSH)
TELECOPIER (202) 662-6290
CABLE: COVLING

September 10, 1984

Charles N. Steele, Esq. General Counsel Federal Election Commission Seventh Floor 1325 K Street, N.W. Washington, DC 20463

Re: MUR 1748

Dear Mr. Steele:

This letter is submitted on behalf of the National Congressional Club ("NCC") and the Helms for Senate Committee ("HFS") in response to the Democratic Party of North Carolina's complaint of July 26, 1984, in the above matter. The complaint alleges that NCC and HFS have violated the Federal Election Campaign Act ("FECA") in connection with an NCC advertisement supporting President Reagan's reelection in which Senator Helms appears. NCC and HFS have divided equally the cost of running this advertisement when North Carolina voters will view it. The complaint argues that HFS receives all of the benefit from the advertisement and that NCC accordingly has made illegal contributions to HFS to the extent its proportionate share of the cost exceeds \$5,000.

The Democratic Party's complaint, as shown below, is without basis both legally and factually. Where two political committees share the cost of an advertisement, the benefit each receives should be left to their assessment if reasonable. E.g., 11 C.F.R. § 106.1(a). Here, the only candidate mentioned is President Reagan. The advertisement does not mention the candidacy of Senator Helms. It does not ask viewers to vote for him

COVINGTON & BURLING Charles N. Steele, Esq. Page 2 September 10, 1984 or to contribute money to his campaign. Nonetheless, NCC and HFS concluded that Senator Helms receives some benefit when the advertisement runs in North Carolina. Following Commission regulation and precedents, upon advice of counsel NCC and HFS made a reasonable judgment to split the cost evenly, a judgment that should stand because there is no evidence to refute it. The Democratic Party's factual premises are erroneous. President Reagan's campaign is not "incidental" to the advertise-The primary focus of the advertisement is President Reagan, not Senator Helms. Similarly, the advertisement did not "replace" previously booked HFS television time. The total amount of television time paid for by HFS during the week in question increased as a direct result of the advertisement. Finally, the advertisement was not targeted solely at North Carolina viewers. developed by NCC as part of a national independent-expenditure project. Where it has run outside of North Carolina, NCC has paid the entire cost. Accordingly, the Commission should find no reason to believe that NCC or HFS have violated the FECA. **FACTS** 0 NCC is a multi-candidate political committee registered with the Commission. HFS is the principal campaign committee of Senator Jesse Helms. Contrary to the allegation in the Democratic C Party's complaint, at p. 1, Senator Helms is no longer the honorary chairman of NCC. See Affidavit of Mr. R. E. Carter Wrenn, Executive Director of NCC, attached hereto as Exhibit A, at ¶ 2. During the fall and winter of 1983-84, NCC decided to 2 produce commercials raising the general issue of the fairness of media treatment of President Reagan. Some of these commercials 00 urged support of President Reagan's reelection while others solicited contributions to NCC to support conservative causes general-NCC produced both 60-second and 30-second commercials sounding those themes. No officials from HFS consulted with NCC in the production of these commercials. Id. ¶ 4. NCC never ran the 60-second versions. Id. ¶ 5. During the summer of 1984 NCC decided to run one of the 30-second versions as part of its independent-expenditure project supporting President Reagan. Id. The Democratic Party's characterization of this 30second commercial is inaccurate. The Democratic Party states

COVINGTON & BURLING Charles N. Steele, Esq. Page 3 September 10, 1984 that "the commercial begins by showing Jesse Helms as he views Bella Abzug and Jesse Jackson speaking on television . . . Jesse Helms has a continuous visual or vocal presence in the advertisement until the final seconds of the commercial." Complaint at 2. However, when Ms. Abzug and Mr. Jackson are shown on a television set, Senator Helms does not appear. The first 10 seconds of the commercial show only the television set. A hand reaches in from the right of the screen and turns the channel. Only after about 10 seconds does the camera pull back and show Senator Helms watching the television set. Id. ¶ 6. For the next 10 seconds, Senator Helms is seen sitting at a desk urging Americans to support the reelection of President Reagan. He is identified by a superimposed statement that he is U.S. Senator Jesse Helms. In the next 5 seconds, Senator Helms continues speaking while photographs of President Reagan are The last 5 seconds show photographs of President Reagan and a voice-over (not Senator Helms) urging Americans to vote for 0 President Reagan and identifying the advertisement as a production of NCC's independent-expenditure project. At no time does the commercial refer to the candidacy of Senator Helms, nor does it urge viewers to vote for Senator Helms or solicit contributions C on his behalf. See id. ¶¶ 4, 6. NCC decided that it would run the advertisement during 0 the week of July 20-27, 1984. NCC realized that even though the candidacy of Senator Helms was not mentioned during the adver-M tisement, his appearance in it in North Carolina would be of some C benefit to his reelection campaign. After consultation with counsel, NCC informed HFS that to avoid an in-kind contribution 9 by NCC to HFS it would be necessary for HFS to share the cost of running the advertisement in North Carolina. HFS agreed to this 00 course of action, and on the advice of counsel it was determined to divide the cost of running the advertisement in North Carolina evenly between NCC and HFS. Id. ¶ 7. Although Senator Helms is either seen or heard for one-half of the commercial, the determination to split the cost evenly was not based solely on that fact. NCC and HFS recognized that it was extremely difficult to allocate the benefit between NCC's independent expenditure project and Senator Helms' reelec-The commercial consistently speaks of President tion effort. Reagan throughout, and it does not urge support of Senator Helms. On the other hand, there is general public awareness in North

COVINGTON & BURLING Charles N. Steele, Esq. Page 4 September 10, 1984 Carolina that Senator Helms is a candidate for reelection. Accordingly, on advice of counsel they determined that a reasonable allocation of the cost of running the commercial in North Carolina was fifty-fifty. Id. ¶ 8. NCC and HFS jointly purchased a total of \$61,005 of television time during the period July 20-27. They each paid \$30,502.50. Id. ¶ 10. The decision to buy this time was made between July 11 and July 18. The time was not chosen to target a particular demographic group, but rather was designed to reach the greatest possible number of people based on rating points.1/ Id. ¶ 11. Because the decision to purchase time was made so close to the beginning of the running of the commercial (July 20), there was some concern on the part of NCC and HFS that they would not be able to purchase time so as to maximize the number of viewers. NCC and HFS therefore decided to utilize some time already booked by HFS for the month of July. Earlier in July, HFS had purchased \$157,710 of media time for mid-July to mid-NCC and HFS used \$15,955 of this time for their joint () advertisement. This ensured that the advertisement would get sufficient rating points. Id. ¶ 12. The \$61,005 of advertising purchased jointly by NCC and C HFS was not an exact substitute for the time HFS would have had under its prior purchase orders for several reasons. First, only 3 26 percent of the total time bought jointly by NCC and HFS was C previously booked HFS time. Second, other time booked by HFS pursuant to its \$157,710 purchase was used by it alone during the 2 week of July 20-27. Third, only \$15,955 of previously booked HFS time was utilized for the HFS/NCC effort, while HFS paid 0 \$30,502.50 for joint advertising. Thus HFS increased its advertising during the week of July 20-27 by \$14,547.50. Id. ¶ 13. Finally, as noted, the advertisement that is the subject of the complaint was produced in various versions by NCC in the fall and winter of 1983-84 both to support President Reagan Rating points are an arbitrary value put on a program based on the number of viewers projected to watch it. The projection is done through some type of polling. An example is the Arbitron system.

COVINGTON & BURLING

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Charles N. Steele, Esq. Page 5
September 10, 1984

and to solicit contributions to NCC. NCC determined that it would utilize one of the 30-second versions of the advertisement for its Americans for Reagan independent-expenditure project. Pursuant to that project, NCC has run the advertisement in other states. Because Senator Helms is not running for reelection in those states, NCC pays the full media cost of those airings of the advertisement. Id. ¶ 16.1/

ARGUMENT

Although the Democratic Party gives an elaborate overview of the Commission's regulations and FECA, Complaint at 3-4, it only cursorily notes that allocation of expenditures between candidates "must be made in proportion to the benefit reasonably expected to be derived from the expenditures. 11 C.F.R. 106.1." Complaint at 4. The Democratic Party understandably does not dwell on this citation nor expand its discussion of this point, for relevant Commission precedent makes clear that the judgment of the parties as to what is reasonable should control in the usual case. See, e.g., 11 C.F.R. § 106.1(a); A.O. 1982-56; Explanation and Justification of Part 106, CCH Fed. Elec. Camp. Fin. Guide ¶ 805.

It could not be otherwise. In most cases where one candidate appears in an advertisement to support another candidate, it is very difficult to ascertain how much benefit each will receive from the advertisement. The time each appears on camera or is mentioned clearly cannot be used as a hard and fast rule. Even a brief appearance can be of significant benefit to an endorsing candidate. On the other hand, where the endorsing

 $[\]overline{\text{C}}$ The complaint notes that the advertisement has run in South $\overline{\text{C}}$ arolina, and the cost of such advertisements has been split jointly between NCC and HFS. The station in question reaches a substantial number of North Carolina viewers because it is on the North Carolina border. Out of prudence HFS and NCC have split the cost of running the advertisement there. Exhibit A ¶ 16. In other states where the station's signal does not reach North Carolina voters, NCC pays the total amount of running the advertisement. Id.

COVINGTON & BURLING Charles N. Steele, Esq. Page 6 September 10, 1984 candidate's candidacy is not mentioned but he merely states support of the other candidate, it is at times unclear if the endorsing candidate receives any benefit at all. In some instances the Commission has ruled that a candidate's appearance in a commercial to support another candidate does not constitute any benefit at all to the endorsing candidate. E.g., A.O. 1982-56; 1980-28. This case is a good illustration of why the reasonableness determination should be left to the parties involved. Senator Helms only appears for one-half of the time the commercial is No mention is made of his candidacy nor are viewers asked to vote for him or to contribute to his campaign. The entire 30 seconds are spent talking about President Reagan and his programs and is designed to promote his reelection to office. Nonetheless, Senator Helms surely receives a benefit with North Carolina voters by being associated with President Reagan and his policies. It would be disingenuous to suggest he does not. But, once that is recognized, no easy formula presents The Commission's regulations offer no bright-line guidance but rather refer only to "reasonableness." Should the allocation be based on the time devoted to each, the prominence of the use of each's name, the putative psychological effect on North Carolina voters, or some other method? Recognizing these difficulties, and after consulting counsel, NCC and HFS made a good-faith effort to allocate the respective benefits. A fifty-fifty allocation thus is reasonable under the circumstances as a matter of law. 0 The Democratic Party attempts to overcome this fact and argue that the benefit to President Reagan from the commercial is 5 only incidental by pointing to three factors. See Complaint at 4. First, the Democratic Party states that HFS "expected the 0 full benefit from the 'Americans for Reagan' advertising because it allowed [its media time buyer] to pull prescheduled Helms ads It is unclear exactly what the Democratic Party means by this statement. It may be that the Democratic Party believes that the times at which the advertisement ran are periods that are peculiarly forceful only with respect to Helms supporters but not Reagan supporters. (One would imagine that in many instances the two audiences substantially overlap.) The invoices attached to the complaint show, however, that such is not the case. example, in the invoices for the four stations attached to the complaint, in each instance the advertisement ran during at least one of the network's 7-9 a.m. news shows. That hardly is a time peculiarly of advantage to Senator Helms. The reason for this is

COVINGTON & BURLING Charles N. Steele, Esq. Page 7 September 10, 1984 simple. When HFS bought the time in question, it did not target particular demographic groups. Instead, its goal was to reach the largest number of voters as possible based on ratings. same goal was followed for the HFS/NCC joint effort -- and is standard procedure for political committees. Exhibit A ¶ 15. In any event, the advertisement was not simply substituted for previously booked HFS time. Only about 25 percent of the time utilized for the advertisement was formerly booked for The total amount of HFS payments for time during this period increased, and the commercial here was not the only HFS advertisement running during this period. Second, the Democratic Party argues that the advertisement has run only in North Carolina and thus is directed only at North Carolina voters. Complaint at 4. In the first place, this in no way diminishes the fact that North Carolina voters also will have an opportunity in November to vote for President Reagan. The Democratic Party nowhere explains why appeals to reelect President Reagan will not be taken for just that. Moreover, NCC has continued to run the advertisement in other states as part of its independent-expenditure project and expects to continue to do so until the election. Where the advertisement runs on stations that do not reach North Carolina voters, NCC pays for the full cost. 0 Finally, the Democratic Party contends that Senator Helms is the "principal figure in the ads even though another candidate is mentioned." Complaint at 4. This distorts the 0 commercial. For the first 10 seconds, Senator Helms does not 0 appear; only President Reagan is mentioned. For the next 15 seconds, Senator Helms is seen or his voice is heard, but his ∞ candidacy is not mentioned. The only thing Senator Helms talks about for these 15 seconds is the need to support President Reagan and his policies. The final 5 seconds of the commercial show pictures of President Reagan and a voice-over (not Senator Helms) urging voters to support President Reagan. Under these circumstances, it is hard to understand how President Reagan's role in the commercials is "incidental." Complaint at 4.

COVINGTON & BURLING Charles N. Steele, Esq. Page 8 September 10, 1984 CONCLUSION The Commission should find no reason to believe that NCC or HFS violated the FECA and should dismiss the complaint in this matter. Covington & Burling 1201 Pennsylvania Ave., N.W. P.O. Box 7566 Washington, DC 20044 (202) 662-6000 0 53 0 Ŝ α

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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HELMS FOR SENATE COMMITTEE and NATIONAL CONGRESSIONAL CLUB

MUR 1748

AFFIDAVIT OF R.E. CARTER WRENN, EXECUTIVE DIRECTOR, NATIONAL CONGRESSIONAL CLUB

- R.E. Carter Wrenn, having been duly sworn, states as follows:
- 1. I am the Executive Director of the National Congressional Club ("NCC"), a position I have held since 1979. The NCC is a multicandidate political committee registered with the Federal Election Commission ("FEC").
- 2. I have read the complaint dated July 26, 1984, filed with the FEC by the Democratic Party of North Carolina, entitled MUR 1748 by the FEC. The complaint refers to an advertisement supporting the reelection of President Reagan in which Senator Jesse Helms appears. As the complaint notes, the cost of running the advertisement in North Carolina during the week of July 20-27 was split evenly between NCC and the Helms for Senate Committee ("HFS"). HFS is the principal campaign committee for Senator Helms' reelection effort in North Carolina. Senator Helms no longer is the honorary chairman of NCC.

- 2 -

3. After reading the complaint, I examined, or had examined under my direction, the records of NCC relating to this advertisement and have discussed this matter with officials of HFS and employees of NCC and the media time buyer for the running of the advertisement that week. Based on that investigation, and my own recollection of events, I have ascertained the following with respect to the complaint's allegations.

During the fall and winter of 1983-84, NCC decided to produce commercials criticizing the media's treatment of President Reagan and his policies. We obtained film clips of individuals speaking at the March on Washington in the summer of 1983. We then put together 60-second and 30-second advertisements. Some of these commercials urged President Reagan's reelection while others asked viewers to send money to NCC and thereby support conservative causes generally. One of these 30-second commercials is the one referred to in the complaint. The first 10 seconds show a television set with Bella Abzug and Jesse Jackson speaking at the March on Washington. The camera then pans back and shows for 10 seconds Senator Helms seated at a desk speaking about President Reagan and the need to support his policies. last 10 seconds show photographs of President Reagan. For 5 of these last 10 seconds, Senator Helms continues speaking. final 5 seconds utilizes a voice-over (not Senator Helms) urging President Reagan's reelection.

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NCC never ran any of these 60-second commercials. Instead, during the summer of 1984 we decided to use one of the 30-second versions in NCC's independent-expenditure project advocating the reelection of President Reagan from July 20-27. I have reviewed the transcript of this commercial 6. attached as Exhibit A to the Democratic Party's complaint. It is accurate except where it implies that during the first 10 seconds Senator Helms can be seen watching the television set. A similar misstatement appears at page 2 of the complaint. All that is seen during the first 10 seconds is a television set and an unidentified hand that reaches in from the right and changes the 0 television channel. Senator Helms does not appear until the camera pans back to show him seated at his desk approximately 10 . seconds into the commercial. After we decided to run the 30-second advertisement 7. 0 as part of our independent-expenditure project, we realized that 2 Senator Helms' campaign would receive some benefit when the adver-C C tisement ran in North Carolina even though his candidacy was not 3 mentioned and the viewers were not urged to vote for him or send money to his campaign. After discussing the matter with counsel, we discussed this with HFS officials and determined that it was willing to bear part of the cost of running the advertisement in North Carolina. On advice of counsel, NCC and HFS decided that a fifty-fifty split of the cost in North Carolina was a reasonable allocation of the benefits we each would receive.

- 4 -

8. This fifty-fifty allocation was not based solely on the fact that Senator Helms only appears during half of the commercial. Rather, we and HFS recognized that it was very difficult to make any precise allocation. The entire commercial is devoted to support for President Reagan. He is the only person mentioned as a candidate. Senator Helms' candidacy is not mentioned, and viewers are not asked to vote for him or to contribute money to his campaign. Nonetheless, Senator Helms undeniably received some benefit with respect to North Carolina voters by being associated with President Reagan and his policies. Based on all these facts, we and HFS decided that a fifty-fifty allocation was reasonable in the circumstances.

9. I have reviewed Exhibits D through L of the complaint. These constitute purchase orders, political broadcast statements, and checks with respect to the running of the advertisement in North Carolina from July 20-27. Exhibits D through L only cover four stations: (1) Exhibits D-I, WRAL; (2) Exhibit J, WXII; (3) Exhibit K, WGHP; and (4) Exhibit L, WFMY. Exhibit M is, as it states, a "partial summary" of the schedule of advertising. It lists seven stations on which the advertisement ran during the week July 20-27.

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10. The advertisement ran on 21 television stations in six markets during this period. The total cost for these advertisements was \$61,005. NCC and HFS each paid \$30,502.50.

The goal in buying this amount of time was not to target particular voters but rather to reach the largest number of viewers possible. The simplest way to do that (and a common way of purchasing media time) is to buy time so as to ensure a certain number of rating points. The higher the number of rating points, the more people view the commercial. For example, in this project we set an aggregate goal of 1,600 rating points for all six markets. 12. The decision to run the advertisements on July 20-27 was made over the course of a week from July 11 to July 18. 1 Because some of the decisions were not finalized until Wednesday, July 18, NCC had some concern that we would not achieve our goal of 1,600 rating points. HFS informed us that, as is its standard 3 practice, it had booked \$157,510 of advertising time for mid-July 20 to mid-August. We recognized that we could achieve our goal by 0 utilizing in part this previously booked HFS time. Accordingly, 2 we used \$15,955 of previously booked HFS time to air the commer-0 5 cial that is the subject of the complaint. 00 This \$15,955 of HFS time does not represent a simple replacement of the joint advertisement for HFS advertisements. HFS's share of the total cost of the joint project was \$30,502.50. HFS thus bore the cost of an additional \$14,547.50 of advertising. In addition, originally scheduled HFS time during this period also was used by it for its own advertisements.

- 6 -

a notice sent by our media time buyer to one of the stations running the advertisement. Exhibit C indicates that on July 18 our media time buyer talked to people at the station. Exhibit C instructs the station that on July 20-22 previously scheduled HFS time would be used for the commercial here. Exhibit C then notes that an originally scheduled HFS commercial entitled HFS 850-A "will run on the original HFS contracts, and AFR-1 [the advertisement that is the subject of the complaint] will run for the buy [of NCC and HFS] scheduled to run July 23-27, 1984." Thus Exhibit C shows that our advertisement was substituted for HFS commercials during the period July 20-22. However, from July 23-27, HFS and NCC jointly paid for the running of this advertisement, while HFS's own commercials also ran during that period as had previously been scheduled.

which the advertisement ran were particularly geared to supporting only Senator Helms and not President Reagan. As noted, in purchasing the time we did not focus on particular demographic groups. That fact is shown, for example, by Exhibit D to the complaint. It notes that the advertisement ran on WRAL in Raleigh during Good Morning America, a baseball game, and a network movie. The same is true in WGHP-TV in High Point (Exhibit K). There the advertisement ran during the evening Eye Witness News, the British Open Golf Tournament, and a tennis tournament.

tisement outside of North Carolina as part of its independentexpenditure project. For example, we purchased time for it in
the following cities recently: Allentown, PA; West Palm Beach,
FL; Phoenix, AZ; Annaheim, CA; and Houston and Dallas TX. NCC
presently plans to continue this. Where no North Carolina viewers see the commercial, NCC pays the entire cost. Where the
station does reach a substantial number of North Carolina viewers
(e.g., South Carolina), we split the cost with HFS.

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The foregoing facts are true and correct to the best of my knowledge and belief and are made in good faith.

	R.E. Carter Wrenn
Subscribed and sworn to before	me this day of September, 1984
	Notary Public

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 23, 1984

Daniel A. Rowley Covington & Burling 1201 Pennsylvania Avenue, N.W. P.O. Box 7566 Washington, D.C. 20044

Re: MUR 1748

Dear Mr. Rowley:

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This is in reference to your letter dated August 5, 1984, requesting an extension until September 10, 1984, to respond to the complaint in the above matter. After considering the circumstances presented in your letter, the Commission has determined to grant you your requested extension. Accordingly, your response will be due on September 10, 1984.

If you have any questions, please contact Gary L. Johansen, the attorney assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele

Associate General

GCC# 4339

COVINGTON & BURLING

IZOI PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566 WASHINGTON, D. C. 20044

TELEPHONE (202) 662-6000

WRITER'S DIRECT DIAL NUMBER

(202) 662-5344

TWX:710 822-0005 (CS WBIQ)
TELED 80-883 (DOVLINE WBIQ)
TELECOPIER INFORMATION:
(202) 962-8280
CABLE: COVLINE

August 15, 1984

BY HAND

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Gary Johansen, Esq.
Federal Election Commission
7th Floor
1325 K Street, N.W.
Washington, DC 20463

Re: MUR 1748

Dear Mr. Johansen:

Pursuant to our telephone conversation this morning, I am writing to request a two week extension of time until September 10 to file a response to the complaint in the above matter. As I mentioned, all of the principals who have information about this matter will be in Dallas for the Republican National Convention this week and next. Accordingly, we will not be able to begin work on a response until they return the week of August 27.

If you have any further questions, please do not hesitate to call. Thank you for your assistance in this matter.

Sincerely,

Daniel A. Rowley

GCC+ 4572

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1748		
NAME OF COUNSEL:	Daniel A. Rowley **	.
ADDRESS:	Covington & Burling .	
	1201 Pennsylvania Ave., N.W.	GENERAL STATE
	Washington, DC 20044	
TELEPHONE:	(202) 662-5344	OUNSEL C
		'S' P' C

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

August 31, 1984
Date

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RESPONDENT'S NAME: National Congressional Club

ADDRESS: 3825 Barrett Drive

Raleigh, NC 17609

EOME PHONE:

BUSINESS PHONE: (919) 782-5700

** Of Counsel: Thomas A. Farr, Esq.

Maupin, Taylor & Ellis, P.A.

P.O. Drawer 19764 Raleigh, NC 27619-(919) 781-6800

Please address all communications to Mr. Rowley.

STREMENT OF DESIGNATION OF DUNSEL

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MUR 1748 John Bolton NAME OF COUNSEL: Tom Farr, Attorney Covington & Burling ·1201 Pennsylvania Ave, NW ADDRESS: . Maupin. Taylor & Ellis Washington, D.C. 20044 Suite 200 (202) 662-6000. Merrill Lunch Bldg. 3201 Glenwood Ave. Raleigh, NC 27612 (919) 781-6800 TELEPHONE:

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

August 10, 1984

Date

BUSINESS PHONE:

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Bignature

Mark L. Stephens

3325 Executive Dr, Suite 1113
Raleigh, NC 27609

EOME PHONE:

(919) 469-3585

(919) 876-8522







Federal Elections Commission 1325 K St., N.W. Washington, D.C. 20463

GCC#4339

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W. P. O. BOX 7566

P. O. BOX 7565

TELEPHONE (202) 662-6000

WRITER'S DIRECT DIAL NUMBER

(202) 662-5344

TWX:710 SE2-GOOS (CS WSH)
TELEX: SO-SS2 (DOVLING WSH)
TELECOPIER INFORMATION:
(202) GG2-G260
CABLE: COVLING

August 15, 1984

BY HAND

C

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Gary Johansen, Esq. Federal Election Commission 7th Floor 1325 K Street, N.W. Washington, DC 20463

Re: MUR 1748

Dear Mr. Johansen:

Pursuant to our telephone conversation this morning, I am writing to request a two week extension of time until September 10 to file a response to the complaint in the above matter. As I mentioned, all of the principals who have information about this matter will be in Dallas for the Republican National Convention this week and next. Accordingly, we will not be able to begin work on a response until they return the week of August 27.

If you have any further questions, please do not hesitate to call. Thank you for your assistance in this matter.

Sincerely,

Daniel A. Rowley



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 6, 1984

Mr. David E. Price
Executive Director
North Carolina Democratic Party
P. O. Box 12196
Raleigh, North Carolina 27605-2196

Dear Mr. Price:

This letter is to acknowledge receipt of your complaint which we received on July 30, 1984, against Senator Jesse Helms, Carter Wrenn, National Congressional Club, Mark L. Stephens and Helms for Senate which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedure for handling complaints. If you have any questions, please contact Barbara A. Johnson at (202) 523-4143.

Sincerely,

Charles N. Steele General Sounsel

Kenneth A. Gross

Associate General Counsel

Enclosure

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 6, 1984

CERTIFIED HAIL RETURN RECEIPT REQUESTED

Carter Wrenn, Treasurer National Congressional Club P. O. Box 18848 Raleigh, North Carolina 27619

Re: MUR 1748

Dear Mr. Wrenn:

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This letter is to notify you that on July 30, 1984 the Federal Election Commission received a complaint which alleges that the club and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1748. 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 club and you, as treasurer

, in connection with this matter. Your response 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.

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.

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. The second of the second

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If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Gary Johansen, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele General Counsel

By: Kenneth A. Gross

Associate General Counsel

Enclosures

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1. Complaint

2. Procedures

3. Designation of Counsel Statement

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 6, 1984

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mark L. Stephens, Treasurer Helms for Senate 1233 Pond Street Cary, North Carolina 27511

Re: MUR 1748

Dear Mr. Stephens:

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This letter is to notify you that on July 30, 1984 the Federal Election Commission received a complaint which alleges that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1748. 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 connection with this matter. Your response 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.

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.

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 a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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If you have any questions, please contact Gary Johansen, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele General Counsel

Associate General Counsel

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(The restricted delivery fee is charged in addition to the return receipt fee.) TOTAL S	
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The Democratic Party of North Carolina

Post Office Box 12196
Raleigh, North Carolina 27605-2196 • Telephone (919) 821-2777

July 26, 1984

The Goodwin House 220 Hillsborough Street

Tape in Docket

MUR 1748

Mr. Charles N. Steele General Counsel Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463

Re: Federal Election Campaign Act Violations U.S. Senate Election, North Carolina

Dear Mr. Steele:

As Executive Director of the Democratic Party of North Carolina and as a registered voter of North Carolina, I am writing to report what I believe are continuing violations of the Federal Election Campaign Act by the Helms for Senate committee and the National Congressional Club. The violations arise from an "Americans for Reagan" television advertising campaign that is jointly sponsored by the National Congressional Club and the Helms for Senate committee. (See Attachment A). I believe the joint sponsorship of this advertising constitutes an illegal excessive contribution by the National Congressional Club to the Helms for Senate committee and an illegal receipt of an excessive contribution by the Helms for Senate committee.

Background

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The Helms for Senate committee is the principal campaign committee of Jesse Helms, the Republican candidate for election to the U.S. Senate from North Carolina. The National Congressional Club is a multi-candidate political committee that was formed by Jesse Helms and his supporters in 1973. (See Attachment B). From the formation of the National Congressional Club to the present, Jesse Helms has been instrumental in sustaining the National Congressional Club by acting as its honorary chairman and by signing or lending his name to numerous fundraising appeals on its behalf. Until 1979, the National Congressional Club was known as the North Carolina Congressional Club and focused its attention on North Carolina politics.

On July 20, 1984, the National Congressional Club and the Helms for Senate committee began airing a 30-second

Mr. Charles N. Steele July 26, 1984 Page Two

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television commercial in which Jesse Helms appears throughout the commercial to speak on behalf of President (See Attachment A). The commercial begins by showing Jesse Helms as he views Bella Abzug and Jesse Jackson speaking on television and moves to Jesse Helms sitting at his desk speaking to the viewer. In the final seconds of the advertisement a brief film of Reagan before Congress and a still photograph of Reagan is shown as an announcer verbally identifies the National Congressional Club as a sponsor of the spot. Jesse Helms has a continuous visual or vocal presence in the advertisement until the final seconds of the commercial. Jesse Helms is the only person to speak directly to the viewer and he is identified while speaking to the viewing audience by superimposed letters reading: U.S. Senator Jesse Helms. No image or picture of Ronald Reagan appears until the very end of the advertisement.

Upon information and belief, this political commercial is being aired only on North Carolina broadcast stations or on broadcast stations which reach a North Carolina viewing audience. The broadcast market is the same market in which Jesse Helms is seeking election to the U.S. Senate.

Upon information and belief, the media buyer for both Helms for Senate and the National Congressional Club is Jefferson Marketing, Inc. When Jefferson Marketing, Inc. purchased broadcast time for this political advertisement, it replaced or substituted previously scheduled Helms for Senate ads with "Americans for Reagan" ads. (See Attachment C). Jefferson Marketing, Inc. purchase orders, check stubs and the station agreement forms all indicate that the advertising is placed on behalf of Helms for Senate. (See Attachments D, E, F, G, H, I, J, K, L, and M).

Upon information and belief, prior to the joint funding of this political advertisement, the National Congressional Club had contributed to the Helms for Senate committee the maximum amount permissible under the Federal Election Campaign Act. Upon information and belief, the total cost of this advertising campaign will greatly exceed the contribution limit of \$5,000.00. The National Congressional

Mr. Charles N. Steele July 26, 1984 Page Three Club and Helms for Senate are dividing the cost of the advertisement on a 50/50 basis. The content, scheduling and media market of this political message demonstrates that Jesse Helms is receiving the full and undivided benefit from this jointly sponsored media campaign. Illegal and Excessive Contributions The term contribution is defined in 2 USC § 431(8)(A) of the Federal Election Campaign Act as: any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for 0 Federal office. The Act further provides in 2 USC §441a(a)(7)(B)(i) 0 that: M expenditures made by any person in cooperation, consultation, or concert, with, or at the request or suggestion of, a candidate, his authorized C 0 political committees, or their agents, shall be considered to be a contribution to such candidate. 00 The Code of Federal Regulations adopted to implement the Act define "anything of value" in 11 CFR 100.7(a)(1)(iii) as: (iii)(A) For purposes of 11 CFR 100.7(a)(1), the term "anything of value" includes all in-kind contributions. Unless specifically exempted under 11 CFR 100.7(b), the provision of any goods or services without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution. Examples of such goods or services include, but are not limited to: securities, facilities, equipment, supplies, personnel, advertising services, membership lists, and

Mr. Charles N. Steele July 26, 1984 Page Four mailing lists. If goods or services are provided at less than the usual and normal charge, the amount of the in-kind contribution is the difference between the usual and normal charge for the goods or services at the time of the contribution and the amount charged the political committee. As a multi-candidate political committee, the National Congressional Club is prohibited from contributing anything of value over \$5,000.00 per election to a principal campaign committee of a candidate (Helms for Senate). 2 USC §441a(a)(2). Furthermore, it is unlawful for the Helms for Senate committee to knowingly accept anything of value over \$5,000.00 from the National Congressional Club. §441a(f). The National Congressional Club and the Helms for Senate committee have coordinated this advertising campaign and the advertising costs paid by the National Congressional Club constitute excessive contributions to the Helms for 0 Senate committee. 2 USC §441a(a)(7)(B), 2 USC §441a(f). Allocation of expenditures between candidates must be C made in proportion to the benefit reasonably expected to be derived from the expenditures. 11 CFR 106.1. 9 The simple fact that Jesse Helms makes an appeal to 00 support President Reagan belies an expectation of only a 50% benefit from the advertising. Advocating support for another candidate does not necessarily cut in half the benefit a candidate reasonably expects to receive from a political message. All the circumstances of the advertisement should be considered to determine what benefits a candidate can reasonably expect. It is clearly evident that Helms for Senate expected the full benefit from the "Americans for Reagan" advertising because it allowed Jefferson Marketing to pull prescheduled Helms ads, the advertising is directed to the audience in the state in which Helms is a candidate, and Helms is the principal figure in the ads even though another candidate is mentioned. Any incidental benefit Ronald Reagan derives from this advertising does not diminish in any way the

Mr. Charles N. Steele July 26, 1984 Page Five

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benefit to Helms. The Helms for Senate committee is receiving 30 seconds of political advertising in the North Carolina media market at half the usual and normal rate. The National Congressional Club's payment of one-half of the cost of the spot constitutes a benefit to the Helms for Senate campaign and the payment is an in-kind contribution in excess of the contribution limits. 2 USC §441a(a)(2). The Helms for Senate committee is knowingly participating in this joint advertising venture and has violated 2 USC §441a(f) by accepting unlawful excessive in-kind contributions from the National Congressional Club.

Relief Sought - Investigation and Sanction

In the General Counsel's Report in MUR 950, the General Counsel stated that although the Commission has never issued a per se bar to the establishment and maintenance of a multi-candidate committee by a candidate who has a functioning principal campaign committee, the multi-candidate committee cannot be used to benefit the principal campaign committee. (MUR 950, General Counsel's Report p. 4). The very activity proscribed by the General Counsel is occurring in the joint advertising campaign of the National Congressional Club and the Helms for Senate I ask that the Commission take immediate measures to investigate and enjoin these violations of the Federal Election Campaign Act. I further request that the Commission advise the Helms for Senate committee and National Congressional Club that any continuing violations after this date will be considered willful and subject to appropriate sanctions.

I submit this letter under oath and pursuant to the provisions of 2 USC §437g(a)(1) as a formal complaint against the National Congressional Club and the Helms for Senate committee.

Mr. Charles W. Steele July 26, 1984 Page Six

I would appreciate your immediate investigation of these matters.

Sincerely,

David E. Price

Executive Director

North Carolina Democratic Party

SWORN TO AND SUBSCRIBED before me this day of ______, 1984.

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My Commission Expires: 7.8 25,1985

HEIMS TV AD (30 sec)-ABZUG/JACKSON/REAGAN

VIDEO BELLA ABZUG SPEAKING ON TELEVISION.

SUPER: BELLA ABZUG RADICAL FEMINIST

[HELMS TURNS TV CHANNEL]

JESSE JACKSON SPEAKING ON TELEVISION. SUPER: JESSE JACKSON RADICAL

ACTIVIST

[HELMS TURNS OFF TV]

AUDIO

ABZUG:

JACKSON: TO THE WHITE HOUSE, WE WILL

IS TO MOVE OUT.

MARCH ON, MARCH ON

HELMS AT DESK.

SUPER: U.S. SEN JESSE HELMS

HELMS:

YOU KNOW, NIGHT AFTER NIGHT THE

THERE'S ONLY ONE WAY FOR YOU

TO MOVE, MR. REAGAN, AND THAT

LIBERAL NEWS MEDIA TROT OUT PEOPLE LIKE THESE TO SPEAK FOR ALL AMERICA. AND TO UNDERMINE PRESIDENT REAGAN OF COURSE. IT'S NOT RIGHT AND IT'S NOT FAIR BECAUSE RONALD REAGAN IS MAKING

THIS COUNTRY STRONG AGAIN.

FILM OF REAGAN BEFORE

CONGRESS.

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ALL AMERICANS SHOULD SUPPORT

OUR PRESIDENT.

STILL PICTURE OF REAGAN.

SUPER: THE NATIONAL CONGRESSIONAL CLUB

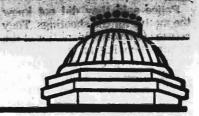
Paid for by the National

Congressional Club and the Helms for Senate Committee. Not authorized

by any Presidential Candidate or Presidential Candidate's Committee.

ANNCR: AMERICANS FOR REAGAN. A CAMPAIGN OF THE NATIONAL CONGRESSIONAL CLUE.





Democrats consider challenge to Helms ad

North Carolina Democrats are studying a possible legal challenge to a television commercial aponsored by the National Congressional Club that prominently features Sen. Jesse A. Helms boosting the re-election of President Reagan.

An aide to Gov. James B. Hunt Jr., who is challenging Helms for se-election, told Dome Monday that the ad appears to be a way for the Congressional Club to get around federal spending limits on contributions to Helms' campaign.

The political commercial, which began airing nationally last week, features film clips of Democratic presidential candidate the Rev. Jesse L. Jackson and former New York Congresswoman Bella Abzug.

In the commercial, Helms tells

See BOME, page 6A

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Under the dome



Continued from page 1A

media trots out such figures as
Jackson and Ms. Abzug every
night to attack Reagan. Their
criticism isn't fair, Helms says,
because the president is doing a
good job.

Claude A. Allen, press secretary for the Helms campaign, said the cost of the commercial was being divided equally between the Helms campaign and the National Congressional Club, which he said was making an independent expenditure on behalf of the Reagan campaign. The Congressional Club is a Raleigh-based conservative political action committee founded by Helms and supporters in 1973.

"It is a joint expenditure," said Allen. "Each participant pays for the benefit they get out of it."

He declined to say how much the ad cost.

Democratic Party attorneys
Monday were reviewing the commercial to determine if the Congressional Club was using it to
subsidize the Helms campaign
and bypass federal campaign contribution limits.

Will Marshall, press secretary for the Hunt campaign, said the Reagan-Helms commercial "in our view constitutes an illegal corporate contribution by the Congressional Club to the Helms campaign."

"It appears to us that Jesse Helms is trying to sneak money into his campaign and skirt election laws under the guise of showing his support for Royald Reagan," Marshall said in an interview,

"The campaign attorneys are studying this apparent violation of state election laws, and we will certainly file a complaint if they believe one is warranted."

Federal election laws permit political committees to contribute a maximum of \$5,000 per election, or a total of \$10,000 counting primary and general election campaigns.

Marshall said the Congressional Club had contributed a total of \$4,500 to the Helms campaign, for both the primary and general election.

Allen said attorneys for the Helms campaign had reviewed the cost-sharing arrangement and believed it to be legal. He said the attorneys decided that a 50-50 split in financing the commercial was equitable.

ATTENTION TRAFFIC

Per our conversation on Wednesday, July 18, 1984, all previous HFS contracts (now Helms for Senate/National Congressional Club contracts) will run 100% AFR-1 on Friday, July 20 through Sunday, July 22, 1984.

On Monday, July 23, 1984, HFS 850-A will run on the original HFS contracts, and AFR-1 will run for the buy scheduled to run July 23-27, 1984.

If you have any questions concerning this rotation, please do not hesitate to call me at (919) 781-4824.

Thank you.

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8 6 0

JEFFERSON MARKETING, INC.

P.O. BOX 19607 . RALEIGH, NORTH CAROLINA 27619

*PURCHASE ORDER

THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRE-

NO.

2623

VENDOR WRAL - TV

2619 Western Blvd. Raleigh, NC. 27605 SHIP TO

Attention: Quinn Koontz

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

SPONDENCE.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

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NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.



AGREEMENT FORM FOR POLITICAL BROADCASTS

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Jefferson Marketing	g, Inc.	(being)(on behalf of)	U.S.	Senator	Jesse	Helms	
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This application, whether accepted or rejected, will be available for public inspection for a period of two years in accordance with FCC regulations (AM, Section 73.120; FM, Section 73.290; TV, Section 73.657).

JEFFERSON MARKETING INC. P. O. BOX 19807 RALEIGH, N. C. 27818

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July 18, 19 84

PAY TO THE ORDER OF .

WRAL - TV

3357.50

THE SUM 3357 DOLS 50 CTS

DOLLARS

FIRST CITIZENS BANK
First Citizens Bank & Trust Company
Raleigh, N.C. 27602

Robert / Holding > #00006214# 4:053100300:0861143935#

JEFFERSON MARKETING INC.

O DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11166 - To purchase TV time for Helms for Senate.	\$3357.50
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JEFFERSON MARKETING, INC. P.O. BOX 19807 • RALEIGH, NORTH CAROLINA 27619

*PURCHASE ORDER

NO.

3045

THE NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRE-

VENDOR WRAL - TV

2619 Western Blvd. Raleigh, N.C. 27605 SHIP TO

Attention: Quinn Koontz

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

PURCHASE ORDER DA	TE DATE	REQUIRED	JOS NUMBER T		F.O.B.		PROOF	REQUIRED:		ACCOUNT
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NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

L. Ha. LOY PURCHASING AGENT



AGREEMENT FORM FOR POLITICAL BROADCASTS

E <u>Jefferson Marketing</u>	A = ! = = \	
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July 23	July 27	Total Charges: \$956.25
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This application, whether accepted or rejected, will be available for public inspection for a period of two years in accordance with FCC regulations (AM, Section 73.120; FM, Section 73.290; TV, Section 73.657).

JEFFERSON MARKETING INC. P. O. BOX 19807 RALEIGH, N. C. 27819

Nº 6160

<u>66-30</u> 531

July 18, 19 84

PAY TO THE ORDER OF _

956.25

THE SUM 95 6 DOLS 25 CTS

DOLLARS

FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

Rent ! Holding III

#00006160# 4:053100300:0861143935#

JEFFERSON MARKETING INC.

DESCRIPTION	AMOUNT
PO #11110 - To purchase TV time for Helms for Senate.	£956.25
RECEIPT & AFFIDAVIT REQUESTED	
	PO #11110 - To purchase TV time for Helms for Senate.







3 0

9 0

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STATION and LOCATIONWX	II-TV	Winston Salem, N.C. 19 8	4
Jefferson Marketing,	inc. (being) (on behalf of)	U.S. Senator Jesse Helms	_
legally qualified candidate of the	Republican political part	ty for the office of	_
United States Senat	te		_
n theel	action to be held on November	1984do hereby request station time	25
ollows:			
-LENGTH OF BRUADCASTHOL	IN DAYS TIMES PER WE	EKTOTAL NO. WEEKS RATE_	
July 20, 1984	July 27, 1984	\$2,465.00	
0dry 20, 1304	0413 217 1301	Total Charges:	_
vidual person, is: () a corporation he names and offices of the chief	n; () a committee; () an assoc	furnishing the payment, if other than an idealistic or () other unincorporated grounds:	up.
Mark Stephens, Treas	surer / Carter Wrenn	, Treasurer	
nary runoff election, or within 60 d mit charge of the station for the sam	ays of a general or special election ne class and amount of time for the is by the candidate but outside the	himself within 45 days of a primary or pon, the above charges represent the lowersame period; where the use is by a perse aforementioned 45 or 60 day periods, to f such station by other users.	est
934, as amended, and the FCC's ereof, which I have read and unde amages or liability that may ensue roadcasts I also agree to prepare	rules and regulations, particularlesstand. I further agree to indem from the performance of the about a script or transcription, which efore the time of the scheduled in the sc	be governed by the Communications Act by those provisions reprinted on the ba nify and hold harmless the station for a ve-stated broadcasts. For the above-stat will be delivered to the station at less broadcasts; (note: the two preceding se	ick iny ied ast
Promoto il tito can	Date: 7/18/84	Susan Nulley (Candidate, Supporter or Agent)	
\cap	Date:)
ejected by	de Coley Tiele	(Candidate, Supporter or Agent) Sefferson Marketing,	
nis application, whether accepted of	or rejected, will be available for poly. M., Section 73.120; FM, Section 1	ublic inspection for a period of two years	in in

FERSON MARKETING, INC.

NO. 11160

HIND HIGHBAYA BAUST APPEAR ON NO HINDOCES, PACKAGES AND CORRES

VENDOR WXII - TV

700 Coliseum Dr. Winston Salem, N.C. 27101 SHIP

Attention: Zack Manning

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND PURPILLING IPPURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AN AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THAT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLE RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THE PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FO

INCHASE OADS	A DATE	DATE REQUIRED JA	OB NUMBER	FOR	PROOF REQUIRED		ACCOUNT
7-18-8	34	7-18-84			š o	NO OF SAMPLES	HFS
ORDERED	QUANTIT'S SHIPPED		PLEASE SUP	PLY ITEMS LISTED BELOW		UNIT PRICE	TOTAL
		Ads to Sat. Sun. Sun. Sun.	AFR-1 "Defrun Fri. July 1-6p 11-11:30p 12:30-1p 2-6p 6-6:30	ericans for Recending Reagand 20 - Sun June Major Le Meet the Michigan Early New	n" uly 22, 1984 ague Baseball s Press	150	300.0 2225.0 100.0 200.0
• • •		Sun.	11-11:30p	Late New	5	300	225.0
					gross		1500.0
				Pa	less 159	\$	225.0
Ì					net	1 -	\$1275.0
				Show	net Less 15:	lans	439 2
		Adverti	sing/Dawson -	- HFS/AFR - T	elevsion Purch	nase	
				IPT & AFFIDAV	Man and the second	1, v.	
•							
					PERMIT INTE		

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

PHS. Miller O. June

ORIGINAL.

PEHOUN IMANNETING, INC

VENDOR

SHIP TO

WXII - TV 700 Coliseum Dr. Winston Salem, N.C. 27106

Attention: Zack Manning

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND PULFILLING TO PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AS AGRIEGE THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST IT. ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLI RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF TI-PURCHASE ORDER.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING F FORWARDING TO CLIENT.

	DATE . DAT	REQUIRED JOB NUMBER	F.O.B.	PROOF HEQUIRED	NO OF SAMPLES	ACCOUNT
7-16-	-84 7-	16-84		1 8	REQUIRED	HFS
CHAMITY	CHANTITY	PLEASE SUPPLY	ITEMS LISTED BELOW		UNIT PRICE	. TOTAL
		To purchase television Committee. AFR-1 "Defending Read Ads to run Mon. July" M-F 7-9a Th,F 6p Tg,F 11p	gan" :30 23 - Fri. July		ate 5.0 .50 2 0 350 2 0 225	250.0 700.0 450.0
				less 15 %		210.0
				Tess 15 4		210.0
				net		\$1190.0
· · ·		Advertising/Dawson -	HFS/AFR - TV I	Purchase		
.		CHECK ATTACHED: RECEIL	PT & AFFIDAVIT	REQUESTED .		

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

PURCHASING AGENT

No

6152

July	18.	18	84

PAY TO THE ORDER OF _

WXII - TV

1190.00

THE SUMT T 9 O DOLS O O CTS

DOLLARS

FIRST CITIZENS BANK
First Citizens Bank & Trust Company
Raleigh, N.C. 27602

Heat P Holding 12

#00006152# 4:053100300::0861143935#

JEFFERSON MARKETING INC.

A TOTAL SOUND OF THE PARTY OF T

	DATE	DESCRIPTION	AMOUNT
.0	7/18/84	PO #11108 - To purchase TV time for Helms for Senate.	\$1190.00
		RECEIPT & AFFIDAVIT REQUESTED	
~			

Jul	v 1	8	- 19	84

PAY TO THE ORDER OF ...

WXII - TV

1275.00

THE SUM I 275 DOLS O O CTS

FIRST CITIZENS BANK First Citizens Bank & Trust Company Raleigh, N.C. 27602

lit I Holding

#*00006 208# 4:053 100 300 1:086 1 143 935#

DATE	DESCRIPTION	AMOUNT
0 7/18/84 C	PO #11160 - To purchase TV time for Helms for Senat Americans for Reagan. RECEIPT & AFFIDAVIT REQUESTED	\$1275.00



6 0

STATION SING LOCATION	SHP-TV			High Po.	int, N.	C4984
Jefferson Marketing	, Inc.	(being) _(on behalf of)	U.S.	Senator	Jesse	Helms
legally qualified candidate of the United States Sena		political par	y for the	office of _		
in thee follows:LENGTH OF SROADCASTNO						
DATE OF FIRST BROADCAST		AST SROADCAST	7			
July 20, 1984	July 2	7, 1984	_ Tota	d Charges: _	\$3,23	0.00
represent that the advance participation Helms for Senate C	committee / N	Mational Co	ongres	sional (Club	
nnounce the program as paid for by lividual person, is: () a corporation of the chief	and you a y such person or en on; () a committee executive officers	re authorized to tity. The entity e; () an associ of the entity ar	ongres so descriumishing ation; or	sional (ibe that spoi g the payme () other u	Club nsor in you nt, if other	er log and to
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JEFFERSON MARKETING, INC. P.O. BOX 19807 • RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER

NO.

THE RUMBER LIVEY APPEAR ON ALL INVOICES, PACKAGES AND CORRE-

198

VENDOR WGHP - TV

2005 Francis St. High Point, N.C. 27261 SHIP TO

Attention: Charlie Davis

CLIENT (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT. BY ACCEPTING AND FULFILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHAGE ORDER

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

MCHASE ONDER DATE	DAYEMOUNED	ASSIMANSIA.	[]	PH -7 HEQUINE	NO OF SAMPLES	ACCOUNT
7-18-84	7-18-84	244		¥ 8	REQUIRED	HFS
ONDEAED GUA	110	RE	AGE SUPPLY ITEMS LISTED GELOW		UNIT PRICE	TOTAL
	Senat	AFR-1 *	television time/Americans for Defending Read	Reagan		
	Sun. Fri.	6-6:30r 6-6:30r Sun 12-2p	TV Eyes TV Eyes Birtish	vitness News vitness News	2 @ 325	200.00 425.00 650.00 350.00
				less 1	8	243.75
				net		1381.25
			ler - HFS/AFR -			

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

. Miller For PURCHASING AGENT

---.K.



JEFFERSON MARKETING AP. D. BOX 19807 RALEIGH S. MILLER

NC 27619

(herein referred to as "station")

Station	Adm	tion '	9 07-20-6			Adv. No. Pro	REG		S10		700:	PO	Cond	07-2()- End Date 07-22-
31 02 03 04	07-20- 07-20- 07-21- 07-22-	94 -84 -84	3-20-84 07-20-84 07-21-84 07-22-84	30 30 30 30 30	M-F## H-F SA I	500-2 Am 12N-1230F 12M-1AM 7A-1030A	Code	* *	1 1		JL A4 ZK 51		20 75 30 30	Malagood Fo Data
7 0 9	* 1 200 + 1													
0 5 0 4														
8 6 0 3														
Jenua	,	February	March		April	May		June						
July Agency JEFFI	185 ERSON r	August	Septen	nber	October As Ag	Novem		1	mber	9		Co.		t Total

Representative

As Agent for Television Station WGHP-TV

Sevicion Station WGHP-TV



JEFFERSON MARKETING P. U. BOX 19807 PALEIGN SUSAM MILLER

NC 27619

(herein referred to as "station")

07-20-84 07 07-22-84 07 07-21-84 07 07-22-84 07	REG/HELMS 8 1000 Longth H1M1 8 ENT - CURRENT 7-20-84 30 7-21-84 30 7-21-84 20	Adv. No. Product	D/U.S.SE	NATE/A	Pro	od. C. Care 8	07~20 — 6 ind Date 07~22—1 Makegood For Oate
5 0 4 7 1 0							
8 5 0 3 0							
January February	Merch	April May	June				

As Agent for AMER. FUR REG/HFLHS S

As Agent for Television Station WGHP-TV

The terms and conditions on the reverse side of this page and any attachments hereto are an integral $\,$ Nert of this agreement. The station shall not be bound by any terms or conditions not contained herein.

IFFERSON MARKETING

presentative



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Jefferson Marketing,	Inc. (being	ehalf of) U.S	. Senator	Jesse Helms
legally qualified candidate of the . United States Senat		cical party for the	ne office of _	
the ele	ection to be held on No.	vember.198	4do hereby re	equest station time as
—LENGTH OF BROADCAST— —HOU	ADAYSTIM	ES PER WEEK—	—TOTAL NO. W	EEKS PATE_
DATE OF FIRST BROADCAST	DATE OF LAST BROAD	DCAST		
				\$459.00 net
Helms for Senate Co	ommittee/ Nation and you are auth	al Congres	cast time has sional Cl	Lub
The broadcast time will be used by represent that the advance pay Helms for Senate Commounce the program as paid for by ividual person, is: () a corporation	and you are auth such person or entity. The n; () a committee; () executive officers of the	escribed broade al Congres orized to so des e entity furnish an association; e entity are:	cast time has sional Cocribe that spoing the payme or () other u	: been furnished by Lub nsor in your log and to nt, if other than an in-
The broadcast time will be used by represent that the advance pay	and you are auth such person or entity. The executive officers of the	al Congres orized to so des e entity furnishi an association;	cast time has sional Cocribe that spoing the payme or () other u	: been furnished by Lub nsor in your log and to nt, if other than an in-
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VE	(hotes)	
Jefferson Marketing	(being) (on behalf of)	U.S. Senator Jesse Helms
legally qualified candidate of the		y for the office of
n thee	election to be held on November	. 1984do hereby request station time as
— LENGTH OF BROADCAST — HO	DUNDATA	TOTAL NO WEEKS HATE
DATE OF FIRST BROADCAST	DATE OF LAST BROADCAST	
July 20, 1984	July 22 1984	Total Charges: \$ 518.50 net
he broadcast time will be used b		Total Charges. 9 Pay 100 Mee
nnounce the program as paid for b ividual person, is: () a corporati he names and offices of the chie	y such person or entity. The entity fion; () a committee; () an associate executive officers of the entity are	urnishing the payment, if other than an in- ation; or () other unincorporated group. e:
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Jefferson Marketing	, Inc.	eing) n behalf of)	U.S.	Senator	Jesse	Helms
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United States Sena	Le		-			
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FFERSON MARKETING, INC.



PURCHASE ORDER

2905

VENDOR

SHIP

Phillips Ave & White St. Greensboro, N.C. 27420

"attention: Jeff Sales

CLIENT. (BILL TO)

Jefferson Marketing, Inc.

BILL DIRECT TO THE CLIENT, BY ACCEPTING AND PULPILLING THIS PURCHASE ORDER THE SUPPLIER EXPRESSLY ACKNOWLEDGES AND AGREES THAT THIS PURCHASE ORDER IS TO BE CHARGED AGAINST THE ACCOUNT OF THE CLIENT, AND THAT THE CLIENT SHALL BE SOLELY RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

Secret St. var de con

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

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NO CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS THE STATE OF THE S PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN."

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Partial Summary of Schedule Ad Buys

Washington, NC WITN: July 23-July 27 July 20-July 22

Greenville, Sc. WHES:

Thursday: 8am, 6pm, 11:30 pm

Winston Salem, WXII: scheduled twice last weekend, but not ordered since

Wilmington, WDCT: July 23-July 29 Fon-Fri, 7-9am Thu-Fri, 6pm Non-Sun, 11:30 pm

Wilmington, WWAY: July 23-July 27 Mon-Fri, 7-9am Mon-Fri, 11:30-12am

Thu, Fri, 6-7pm Thu, Fri, 11-11:30 177 0

Asheville, WLOS Sceduled to run July 20-July 22, but did not appear .

Charlotte, WSOC: C July 26-July 27, 5:55-5:57 3 July 23-July 27, 11:59pm-12:01 am July 21, British Open C July 23-July 27, Good Morning America Star Search July 21, July 22, Star Search





FEDERAL ELECTION COMMISSION

1325 K STREET N.W WASHINGTON,D.C. 20463

Date Filmed 7/3//86 Camera No. --- 3

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