



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1748

Date Filmed 7/31/86 Camera No. --- **3**

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FEDERAL ELECTION COMMISSION

- (1) Routing Slips
- (2) Internal Memos
- (3) 12 Day Reports and Comment Sheets
- (4) Bank account information
- (5) Business/trade information for JMI

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

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|-------------------------------------|---|--------------------------|--|
| <input type="checkbox"/> | (1) Classified Information | <input type="checkbox"/> | (6) Personal privacy |
| <input checked="" type="checkbox"/> | (2) Internal rules and practices | <input type="checkbox"/> | (7) Investigatory files |
| <input type="checkbox"/> | (3) Exempted by other statute | <input type="checkbox"/> | (8) Banking Information |
| <input checked="" type="checkbox"/> | (4) Trade secrets and commercial or financial information | <input type="checkbox"/> | (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> | (5) Internal Documents | | |

Signed E. Kleinfeld
date 7-24-86

FEC 9-21-77

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



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

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: 
Kenneth A. Gross
Associate General Counsel

86030604175



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 15, 1986

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Covington and Burling
1201 Pennsylvania Avenue, N.W.
P.O. Box 7566
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Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION

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

RHT

86030604177



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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

RE: MUR 1748
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Helms for Senate and
Mark L. Stephens, as
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Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

RWF

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 15, 1986

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

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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

86030504179



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
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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: 
Kenneth A. Gross
Associate General Counsel

85030604180

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
National Congressional Club) MUR 1748
Carter Wrenn, treasurer)
Helms for Senate)
Mark L. Stephens, treasurer)

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:

1. 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);
2. 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

Mary W. Dove
Mary W. Dove
Administrative Assistant

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BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE FED
COMMISSION SECRETARY

In the Matter of)
)
National Congressional Club)
Carter Wrenn, treasurer)
Helms for Senate)
Mark L. Stephens, treasurer)

MUR 1748 SS MAY 7 P 5: 10

SENSITIVE
EXECUTIVE SESSION
MAY 13 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. § 441a(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. § 441a(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 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

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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.

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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.

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determine the amounts charged to the Helms Committee for production and broadcast services. What was revealed, however, was a system employed to influence federal elections that was so complex, not even respondents were aware of what actually occurred. Counsel for respondents, by their own admission, informed this Office that NCC had supplied "inaccurate and incomplete" information in this matter. Once the latest facts were finally brought to the Commission's attention, it appears that the following occurred.

With regard to the advertisement's production, JMI subcontracted for most of the production, at a cost of \$3,877.26, which was equally divided between NCC's and Helms for Senate's account. In addition, JMI charged \$300 for its services, but one-half of this amount was not allocated to Helms for Senate.

With regard to the advertisement's broadcast, JMI purchased media time for the Americans for Reagan advertisement and adjusted its NCC and Helms for Senate accounts to reflect an approximate 50/50 allocation of the total time purchased. Although the actual final allocation has not yet occurred, the total amount of media time purchased for a North Carolina audience was \$57,325 with NCC's and the Helms Committee's share to equal \$28,662.50 (one-half of the total). JMI asserts that 15% of this amount is attributable to their commission, with NCC and the Helms Committee each paying \$4,299.38.

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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 investigation 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. § 441a(a)(2)(A), § 441a(f) and § 434, and close the file.

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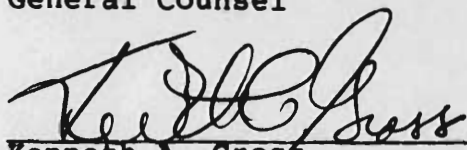
III. GENERAL COUNSEL'S RECOMMENDATIONS

The Office of General Counsel recommends that the Commission:

1. 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);
2. 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 attached letters; and
6. Close the file.

Charles N. Steele
General Counsel

May 7, 1986
Date

BY: 
Kenneth A. Gross
Associate General Counsel

Attachments

1. Response
2. Letters to respondents

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY
SENSITIVE
85 DEC 5 12:20

December 5, 1985

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel *KAG*

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.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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Docket
FEDERAL ELECTION COMMISSION
SENSITIVE
05 DEC 5 12:20

December 5, 1985

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel *KAG*

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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

TWX: 710 622-0006 (CS WSH)
TELEX: 89-893 (COVLING WSH)
TELECOPIER INFORMATION:
(202) 662-8280
CABLE: COVLING

DEC 2 4 11 10
GENERAL COUNSEL

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 containing such confidential information were to have been stamped "CONFIDENTIAL." However, the confidential stamp was inadvertently omitted from the original and copies filed on November 27. The enclosed original and copies should therefore be substituted for those filed on November 27. In addition, Jefferson Marketing, Inc. requests that all of the documents submitted in response to the Commission's request for documents be treated as confidential.

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

Sincerely,

Elliott Schulder

Enclosures

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CONFIDENTIAL

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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

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?

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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CONFIDENTIAL

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GCC-# 9058

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: 710 622-0005 (CB WSH)
TELEX: 88-893 (COVLING WSH)
TELECOPIER INFORMATION:
(202) 662-6280
CABLE: COVLING

(202) 662-5462

November 27, 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 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
Elliott Schulder

Enclosures

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GENERAL INVESTIGATIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
HELMS FOR SENATE COMMITTEE and
NATIONAL CONGRESSIONAL CLUB

MUR 1748

NOV 27 1984 15:07

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

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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.

2. 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 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.

3. 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

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

4. 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 Wrenn

R.E. Carter Wrenn

Subscribed and sworn to before me this 27th day of November, 1985.

My Commission expires: January 26, 1987

Paula L. Kay
Notary Public

86030604201

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

HELMS FOR SENATE COMMITTEE and
NATIONAL CONGRESSIONAL CLUB

MUR 1748

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.

2. 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.

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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 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.

3. 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

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

4. 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 Wrenn

R.E. Carter Wrenn

Subscribed and sworn to before me this 27th day of November, 1985.

My Commission expires:

January 26, 1987

Paula L. Kay
Notary Public

86030504205

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
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The National Congressional Club)
and the Helms for Senate Committee)

MUR 1748

AMENDED RESPONSES OF THE
NATIONAL CONGRESSIONAL CLUB

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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:

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?

Answer: The 30-second AFR advertisement referred to in 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 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 or Presidential candidate's committee." This last expenditure was necessary so that the

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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.

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 AFR advertisements, 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. 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-

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tisements would air in North Carolina as compared to airings outside 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 method.

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

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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 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:

<u>STATION</u>	<u>MARKET</u>	<u>DATES</u>	<u>PURCHASED AMOUNT</u>	<u>N.C. PENETRATION</u>
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 three television stations in South Carolina: WHNS and WYFF

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in Greenville and WSPA in Spartanburg. It aired on WHNS on July 22, 1984, for a purchase price of \$250. It aired on WYFF on July 20-27, 1984, for a purchase price of \$3,660. It aired on WSPA on July 20-22, 1984, for a purchase price of \$850. NCC and HFS split the cost of those airings on a 50/50 basis because a substantial number of North Carolina voters watch WHNS, WYFF and WSPA (Greenville and Spartanburg are near the border of North and South Carolina). Those are the only instances of an airing outside North Carolina where NCC and HFS shared the cost of media time.

* * * * *

B. The National Congressional Club's July 17, 1985 response to the Commission's questions should be amended as follows:

Question 1. 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.

1a. Please specify in detail what NCC did to produce the advertisement.

Answer: The NCC's amended response to the January 7, 1985 questions indicates that HFS in fact paid \$2,950.07 for the production of two AFR advertisements, one of which was the advertisement in question. NCC paid \$3,620.08 to various vendors for the initial production of the two AFR advertisements.

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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 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.

Answer: None. See response to 1a.

1d. 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 1a.

1e. 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 1a.

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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?

Answer: In his amended affidavit dated November 27, 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 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?

Answer: See response to 2a. 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.

2c. 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?

Answer: 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.

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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

R. E. Carter Wrenn
R.E. Carter Wrenn

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

Paula L. Jay
Notary Public

My Commission Expires 1-26-87

86030504214

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
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The National Congressional Club)
and the Helms for Senate Committee)
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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:

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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?

Answer: The 30-second AFR advertisement referred to in 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 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

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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.

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 AFR advertisements, 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. 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-

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tisements would air in North Carolina as compared to airings outside 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 method.

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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

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 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:

<u>STATION</u>	<u>MARKET</u>	<u>DATES</u>	<u>PURCHASED AMOUNT</u>	<u>N.C. PENETRATION</u>
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 three television stations in South Carolina: WHNS and WYFF

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in Greenville and WSPA in Spartanburg. It aired on WHNS on July 22, 1984, for a purchase price of \$250. It aired on WYFF on July 20-27, 1984, for a purchase price of \$3,660. It aired on WSPA on July 20-22, 1984, for a purchase price of \$850. NCC and HFS split the cost of those airings on a 50/50 basis because a substantial number of North Carolina voters watch WHNS, WYFF and WSPA (Greenville and Spartanburg are near the border of North and South Carolina). Those are the only instances of an airing outside North Carolina where NCC and HFS shared the cost of media time.

* * * * *

B. The National Congressional Club's July 17, 1985 response to the Commission's questions should be amended as follows:

Question 1. 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.

1a. Please specify in detail what NCC did to produce the advertisement.

Answer: The NCC's amended response to the January 7, 1985 questions indicates that HFS in fact paid \$2,950.07 for the production of two AFR advertisements, one of which was the advertisement in question. NCC paid \$3,620.08 to various vendors for the initial production of the two AFR advertisements.

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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 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.

Answer: None. See response to 1a.

1d. 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 1a.

1e. 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 1a.

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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?

Answer: In his amended affidavit dated November 27, 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 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?

Answer: See response to 2a. 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.

2c. 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?

Answer: 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.

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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

R.E. Carter Wrenn
R.E. Carter Wrenn

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

Paula L. Day
Notary Public

My Commission Expires 1-26-87

85030604223

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

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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:

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?

Answer: The 30-second AFR advertisement referred to in 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 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 or Presidential candidate's committee." This last expenditure was necessary so that the

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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.

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 AFR advertisements, 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. 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-

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tisements would air in North Carolina as compared to airings outside 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 method.

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

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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 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:

<u>STATION</u>	<u>MARKET</u>	<u>DATES</u>	<u>PURCHASED AMOUNT</u>	<u>N.C. PENETRATION</u>
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 three television stations in South Carolina: WHNS and WYFF

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in Greenville and WSPA in Spartanburg. It aired on WHNS on July 22, 1984, for a purchase price of \$250. It aired on WYFF on July 20-27, 1984, for a purchase price of \$3,660. It aired on WSPA on July 20-22, 1984, for a purchase price of \$850. NCC and HFS split the cost of those airings on a 50/50 basis because a substantial number of North Carolina voters watch WHNS, WYFF and WSPA (Greenville and Spartanburg are near the border of North and South Carolina). Those are the only instances of an airing outside North Carolina where NCC and HFS shared the cost of media time.

* * * * *

B. The National Congressional Club's July 17, 1985 response to the Commission's questions should be amended as follows:

Question 1. 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.

1a. Please specify in detail what NCC did to produce the advertisement.

Answer: The NCC's amended response to the January 7, 1985 questions indicates that HFS in fact paid \$2,950.07 for the production of two AFR advertisements, one of which was the advertisement in question. NCC paid \$3,620.08 to various vendors for the initial production of the two AFR advertisements.

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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 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.

Answer: None. See response to 1a.

1d. 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 1a.

1e. 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 1a.

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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?

Answer: In his amended affidavit dated November 27, 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 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?

Answer: See response to 2a. 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.

2c. 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?

Answer: 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.

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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

R.E. Carter Wrenn
R.E. Carter Wrenn

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

Paula L. Day
Notary Public

My Commission Expires 1-26-87

86030504232

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

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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:

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?

Answer: The 30-second AFR advertisement referred to in 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 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 or Presidential candidate's committee." This last expenditure was necessary so that the

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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.

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 AFR advertisements, 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. 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-

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tisements would air in North Carolina as compared to airings outside 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 method.

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

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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 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:

<u>STATION</u>	<u>MARKET</u>	<u>DATES</u>	<u>PURCHASED AMOUNT</u>	<u>N.C. PENETRATION</u>
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 three television stations in South Carolina: WHNS and WYFF

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in Greenville and WSPA in Spartanburg. It aired on WHNS on July 22, 1984, for a purchase price of \$250. It aired on WYFF on July 20-27, 1984, for a purchase price of \$3,660. It aired on WSPA on July 20-22, 1984, for a purchase price of \$850. NCC and HFS split the cost of those airings on a 50/50 basis because a substantial number of North Carolina voters watch WHNS, WYFF and WSPA (Greenville and Spartanburg are near the border of North and South Carolina). Those are the only instances of an airing outside North Carolina where NCC and HFS shared the cost of media time.

* * * * *

B. The National Congressional Club's July 17, 1985 response to the Commission's questions should be amended as follows:

Question 1. 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.

1a. Please specify in detail what NCC did to produce the advertisement.

Answer: The NCC's amended response to the January 7, 1985 questions indicates that HFS in fact paid \$2,950.07 for the production of two AFR advertisements, one of which was the advertisement in question. NCC paid \$3,620.08 to various vendors for the initial production of the two AFR advertisements.

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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 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.

Answer: None. See response to 1a.

1d. 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 1a.

1e. 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 1a.

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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?

Answer: In his amended affidavit dated November 27, 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 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?

Answer: See response to 2a. 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.

2c. 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?

Answer: 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.

85030504240

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

R.E. Carter Wrenn
R.E. Carter Wrenn

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

Paula L. Fay
Notary Public

My Commission Expires 1-26-87

86030604241

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N.W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

RECEIVED
GENERAL COUNSEL

NOV 27 P 5: 09

TWX: 710 822-0005 (CS WSH)
TELEX: 88-593 (COVING WSH)
TELECOPIER INFORMATION:
(202) 662-8280
CABLE: COVING

TELEPHONE
(202) 662-6000

WRITER'S DIRECT DIAL NUMBER

(202) 662-5462

November 27, 1985

BY HAND

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

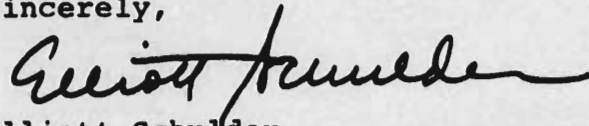
Re: MUR 1748

Dear Mr. Kleinfeld:

Enclosed for filing are 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

3 6 0 3 0 5 0 4 2 4 2

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27618

No 6179

66-30
531

July 18, 84

WLOS - TV

1105.00

THE SUM IS \$1,105.00

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11118 - To purchase TV time for Helms for Senate. RECEIPT & AFFIDAVIT REQUESTED	\$1105.00

85030504243

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27619

No 6112

66-30
531

July 11, 84

1241.00

WLOS - TV

THE SUM I 247 0000000000

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

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

85030504244

↑

⌒

1241.00

JEFFERSON MARKETING INC.
P. O. BOX 18807
RALEIGH, N. C. 27618

No 6205

66-30
531

July 18, 84

WLOS - TV

1088.00

THE SUM I O B A

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

COPY NOT NEGOTIABLE

86030304245

JEFFERSON MARKETING INC.

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

RECEIPT & AFFIDAVIT REQUESTED

10000

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27618

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July 18, 84

WLOS - TV

3187.50

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
8/18/84	PO #11114 - To purchase TV time for Helms for Senate. RECEIPT & AFFIDAVIT REQUESTED	\$3187.50

86030504246

JEFFERSON MARKETING INC.
P. O. BOX 10007
RALEIGH, N. C. 27610

No 6114

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July 11, 84

WSPA - TV

1062.50

THE SUM I O G 2 0 0 - 5 6 0 1 5

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

COPY NOT NEGOTIABLE

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JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/11/84	PO #10947 - To purchase TV time for Hains for Senate. RECEIPT & AFFIDAVIT REQUESTED	\$1062.50

JEFFERSON MARKETING INC.
P. O. BOX 19007
RALEIGH, N. C. 27619

No 6203

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July 18, 84

510.00

WEPA - TV

THE SUMMIT PROJECTS

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11157 - To purchase TV time for Helms for Senate/ Americans for Reagan. RECEIPT & AFFIDAVIT REQUESTED	\$510.00

86030504248

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27619

No 6178

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July 18, 84

WTT - TV

2677.50

THE SUM 2677.50 IS

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

COPY NOT NEGOTIABLE

85030604249

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11119 - To purchase TV time for Balms for Ser.ite.	\$2677.50

RECEIPT&& AFFIDAVIT REQUESTED

JEFFERSON MARKETING INC.
P. O. BOX 18807
RALEIGH, N. C. 27618

No 6113

66-30
531

July 11, 84

WTTT - TV

2830.50

THE SUM 2830.50 DOLLARS

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

COPY NOT NEGOTIABLE

86030504250

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/11/84	PO #10946 - To purchase TV time for Hahn for Senate.	\$2830.50
RECEIPT & AFFIDAVIT REQUESTED		

JEFFERSON MARKETING INC.
P. O. BOX 18807
RALEIGH, N. C. 27618

No 6204

66-30
331

July 18, 84

WYFF - TV

616.25

THE SUM 616.25 CTS

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

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

86030304251

JEFFERSON MARKETING INC.
P. O. BOX 10007
RALEIGH, N. C. 27610

No 6162

08-30
531

July 18, 84

WTT - TV

612.00

THE SUMMIT 2000

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

COPY NOT NEGOTIABLE

86030504252

JEFFERSON MARKETING INC.

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

RECEIPT & AFFIDAVIT REQUESTED

JEFFERSON MARKETING INC.
P. O. BOX 19607
RALEIGH, N. C. 27619

No 6202

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July 18, 84

WENS - TV

212.50

THE SUM 212.50 DOLLARS

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

850303042573

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

JEFFERSON MARKETING INC.
P. O. BOX 18807
RALEIGH, N. C. 27618

No 6173

66-30
531

July 18, 84

WBTB

2018.75

THE SUM 2018.75

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

86030504254

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

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27619

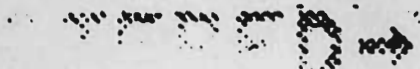
No 6099

66-30
531

July 11, 84

WBTB

4224.50



THE SUM 4224.50 PAID OUTS

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

85030504255

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

JEFFERSON MARKETING INC.

P. O. BOX 18007
RALEIGH, N. C. 27618

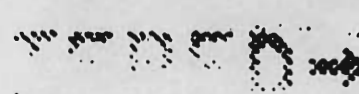
No 6211

66-30
531

July 18, 84

2741.25

WBTB



THE SUM 2741.25 CTS

FIRST CITIZENS BANK

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

85030504256

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11163 - To purchase TV time for Hains for Senayd/ Americans for Reagan.	\$2741.25
RECEIPT & AFFIDAVIT REQUESTED		

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27619

No 6150

66-30
531

July 18, 84

WBTV

2911.25

THE SUM 2911.25 DTS

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11104 - To purchase TV time for Balms for Senate.	\$2911.25

RECEIPT & AFFIDAVIT REQUESTED

860304257

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27619

No 6175

66-30
531

July 18, 84

WSOC - TV

2125.00

THE SUM 2125.00

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

COPY NOT NEGOTIABLE

8603060425A

JEFFERSON MARKETING INC.

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

RECEIPT & AFFIDAVIT REQUESTED

JEFFERSON MARKETING INC.
P. O. BOX 18807
RALEIGH, N. C. 27618

No 6102

06-30
531

July 11, 84

W30C - TV

365.50

THE SUM 365.50

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

COPY NOT NEGOTIABLE

86030504259

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/11/84	PO #10822 - To purchase TV time for Helms for Senate. RECEIPT & AFFIDAVIT REQUESTED	\$365.50

JEFFERSON MARKETING INC.
P. O. BOX 18807
RALEIGH, N. C. 27618

No 6210

$\frac{66-30}{531}$

July 18, 84

WSOC - TV

807.50

THE SUM 807.50 CTS

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

860130304260

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11162 - To purchase TV time for Helms for Senate. RECEIPT & AFFIDAVIT REQUESTED	\$807.50

JEFFERSON MARKETING INC.
P. O. BOX 18807
RALEIGH, N. C. 27618

No 6148

66-30
531

July 18, 84

WSOC - TV

3357.50

THE SUM 3357.50

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11105 - To purchase TV time for Helms for Senate.	\$3357.50

RECEIPT & AFFIDAVIT REQUESTED

33030304261

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27619

No 6172

06-30
331

July 18, 84

WPCQ - TV

1912.50

THE SUM I O I P . . . 5 0 0 1 5

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

COPY NOT NEGOTIABLE.

JEFFERSON MARKETING INC.

86030504262

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11005 - To purchase TV time for Helms for senate,	\$1912.50
RECEIPT & AFFIDAVIT REQUESTED		

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27619

No 6184

66-30
531

July 18, 84

WPCQ - TV

425.00

THE SUMMER PRODUCTS

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

COPY NOT NEGOTIABLE

8
6
0
3
0
5
0
4
2
6
3

JEFFERSON MARKETING INC.

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

JEFFERSON MARKETING INC.
P. O. BOX 18807
RALEIGH, N. C. 27618

No 6149

06-30
531

July 18, 84

WPCQ - TV

191.25

THE SUM TOTAL IS \$191.25

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

8503050426A

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11106 - To purchase TV time for Helms for Senate.	\$191.25

RECEIPT & AFFIDAVIT REQUESTED

JEFFERSON MARKETING INC.
P. O. BOX 18007
RALEIGH, N. C. 27819

No 6284

66-30
53T

August 1, 84

WCCB - TV

331.50

THE SUM 331.50

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

COPY NOT NEGOTIABLE

86030604265

JEFFERSON MARKETING INC.

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

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27619

No 6207

$\frac{86-30}{531}$

July 18, 84

WCCB - TV

408.00

THE SUM 408.00

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

COPY NOT NEGOTIABLE

85030504266

JEFFERSON MARKETING INC.

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

JEFFERSON MARKETING INC.

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27619

No 6169

66-30
531

July 18, 84

WPHI - TV

765.00

THE SUM 765.00 DOLLARS

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

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

RECEIPT & AFFIDAVIT REQUESTED

86030504267

JEFFERSON MARKETING INC.
P. O. BOX 10007
RALEIGH, N. C. 27610

No 6188

66-30
531

July 18, 84

WFTV - TV

1925.25

THE SUN JOURNAL

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

COPY NOT NEGOTIABLE

85030604258

JEFFERSON MARKETING INC.

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

JEFFERSON MARKETING INC.
P. O. BOX 18807
RALEIGH, N. C. 27618

No 6209

66.30
531

July 18, 84

1266.50

WFTV - TV

THE SUN I 266 005 0018

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11161 - To purchase TV time for Helms for Senate/ Americans for Reagan. RECEIPT & AFFIDAVIT REQUESTED	\$1266.50

86030504269

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27618

No 6151

06-30
531

July 18, 84

WFTV - TV

3187.50

THE SUM 3187.50

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

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

RECEIPT & AFFIDAVIT REQUESTED

85030504270

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27619

No 6168

65-30
531

July 18, 84

WGGT - TV

595.00

THE SUM 595.00

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

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

85030504271

JEFFERSON MARKETING INC.
P. O. BOX 18807
RALEIGH, N. C. 27818

No 6171

~~66-30~~
531

July 18, 84

1827.50

WXII - TV

THE SUM IS 1827.50 DTS

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11000 - To purchase TV time for Helms for Senate.	\$1827.50

RECEIPT & AFFIDAVIT REQUESTED

85030504272

JEFFERSON MARKETING INC.
P. O. BOX 18887
RALEIGH, N. C. 27618

No 6186

06-30
33T

July 18, 84

WXII - TV

573.75

THE SUM 573.75 DRS

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

COPY NOT NEGOTIABLE

86030504273

JEFFERSON MARKETING INC.

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

JEFFERSON MARKETING INC.
P. O. BOX 10007
RALEIGH, N. C. 27610

No 6208

66-30
531

July 18, 84

1275.00

WXII - TV

THE SUM I 27500000

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

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

86030504274

JEFFERSON MARK
P.O. BOX 1997

WXXI - TV

MARKETING INC.
BOX 1997
RALEIGH, N. C. 27618

No 6152

06-30
531

July 18, 84

1190.00

ENL

THE SUMMIT

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

COPY NOT NEGOTIABLE

85030504

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11108 - To purchase TV time for Helms for Senate. RECEIPT & AFFIDAVIT REQUESTED	\$1190.00

JEFFERSON MARKETING INC.
P. O. BOX 10007
RALEIGH, N.C. 27610

No 6057

66-30
531

July 9, 84

WTRW - TV

1394.00

THE SUM I 394000 CTS

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

8630904276 ↑

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

JEFFERSON MARKETING INC.
P. O. BOX 18807
RALEIGH, N. C. 27619

No 6170

66-30
531

July 18, 84

WCEP - TV

3604.00

THE SUM 3604.00

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11001 - To purchase TV time for Helms for Senate.	\$3604.00

RECEIPT & AFFIDAVIT REQUESTED

85030504277

JEFFERSON MARKETING INC.
P. O. BOX 18807
RALEIGH, N. C. 27618

No 6105

66-30
531

July 11, 84

382.50

WGHP - TV

7070

THE SUM 382.50

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

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

86030504278

JEFFERSON MARKETING INC.
P. O. BOX 18807
RALEIGH, N. C. 27618

No 6213

66-30
331

July 18, 84

WGHP - TV

1381.25

THE SUM I 38 T 2505

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

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

86030504279

513

JEFFERSON MARKETING, INC

P.O. BOX 19907 • RALEIGH, NORTH CAROLINA 27619 27619

No 6153

66-30
531

VENDOR

WCEP - TV
2005 Fee
WCEP - TV

July 18, 84

1848.75

THE SUM 1848.75

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #18487755 To purchase TV time for Helms fo Senate.	\$1848.75

RECEIPT & AFFIDAVIT REQUESTED

86030504280

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27619

No 6214

66-30
531

July 18, 84

WRAL - TV

3357.50

THE SUM 3357.50 DOTS

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

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

86030504281

JEFFERSON MARKETING INC.
P. O. BOX 18807
RALEIGH, N. C. 27618

No 6116

66-30
53T

July 11, 84

782.00

WRAL - TV THE SUM 782.00 DOTS

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/11/84	PO #11063 - TO PURCHASE TV time for Helms for Senate.	\$782.00

RECEIPT & AFFIDAVIT REQUESTED

85030504282

JEFFERSON MARKETING INC.
P. O. BOX 19907
RALEIGH, N. C. 27619

No 6160

66.30
331

July 18, 84

956.25

WRAL - TV

THE SUM 956.25

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

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

85030504283

JEFFERSON MARKETING INC.
P. O. BOX 18807
RALEIGH, N. C. 27618

No 6176

66-30
531

July 18, 84
935.00

WPTV - TV

THE SUMMER 75

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

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

86030504284

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27619

No 6115

66-30
531

July 11, 84

WPTS - TV

280.50

THE SUM 280 00 50 US

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/11/84	PO #11010 - To purchase TV time for Helms for Senate. RECEIPT & AFFIDAVIT REQUESTED	\$280.50

8 6 1 0 3 0 4 2 9 5

JEFFERSON MARKETING INC.
P. O. BOX 19907
RALEIGH, N. C. 27619

No 6200

66-30
531

July 18, 84

59.50

WPTV - TV

THE SUN 59 JUL 18 1984

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

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

86030504286

JEFFERSON MARKETING INC.
P. O. BOX 18807
RALEIGH, N. C. 27819

No 6159

$\frac{66-30}{531}$

July 18, 84

63.75

WFTV - TV

THE SUM 63.75

FIRST CITIZENS BANK
First Citizens Bank & Trust Company
Raleigh, 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

860304287

JEFFERSON MARKETING INC.
P. O. BOX 18807
RALEIGH, N. C. 27818

No 6181

66-30
531

July 18, 84

Cash

213.50

THE SUM 213.50 DOLLARS

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11117 - To purchase TV time for Hems for Senate. Cashier's check Bank Charge	\$212.50 1.00 <u>\$213.50</u>

86030504288

MEP

MEP

JEFFERSON MARKETING INC.
 P. O. BOX 18837
 RALEIGH, N. C. 27618

No 6117

66-30
 331
 July 12, 84
 613.00

Cash

THE SONG I Z...

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

COPY NOT NEGOTIABLE

85030504289

JEFFERSON MARKETING INC.

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

██████████

JEFFERSON MARKETING INC.
P. O. BOX 18807
RALEIGH, N. C. 27618

No 6098

66-30
531

July 11, 84

Cash

2398.00

THE SUM 2398.00 DOLLARS

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/11/84	PO #10944 - To purchase TV time for Hains for Senate. Cashier's check - WTVD - TV Bank Charge -	\$2397.00 1.00 <u>\$2398.00</u>

RECEIPT & AFFIDAVIT REQUESTED

85030504290

CL

CL

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27619

No 6201

66-30
331

July 18, 84

1225.00

CHEQ - TV

THE SUM I 225

FIRST CITIZENS BANK
First Citizens Bank & Trust Company
Raleigh, 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 <u>\$1225.00</u>

86030304291

1225.00

JEFFERSON MARKETING INC.
P. O. BOX 10007
RALEIGH, N. C. 27610

No 6174

66-30
531

July 18, 84

CASH

3384.00

THE SUM 3384.00 DOLLARS

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11111 - WTVD - TV Cashier's check Bank Charge	\$3383.00 1.00 <u>\$3384.00</u>

86030504292 CL

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27619

No 6206

66-30
531

July 18, 84

WLFL - TV

136.00

THE SUN I 3600000000

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11154 - To purchase TV time for Helms for Senate/ Americans for Reagan.	\$136.00
	RECEIPT & AFFIDAVIT REQUESTED	

04293GT
04293GT
04293GT

JEFFERSON MARKETING INC.
P. O. BOX 18887
RALEIGH, N. C. 27618

No 6166

66-30
531

July 18, 84

WVCT - TV

199.25

THE SUM I 99.00 + 5.00 =

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11057 - To purchase TV time for News for Seats.	\$199.25

RECEIPT & AFFIDAVIT REQUESTED

86030504294



ADVERTISING ACCOUNT
 825 BAYVIEW DR.
 P. O. BOX 15527
 RALEIGH, N.C. 27618

1558

October 5, 1984

67-42
531

INVOICE
ORDER OF

WNCN-TV

\$ 43.00

THE SUM 43.00 DOLLARS

DOLLARS



CENTRAL CAROLINA BANK, N.A.
 ONE FURCO ROAD OFFICE
 RALEIGH, N.C. 27601

NOT NEGOTIABLE

JEFFERSON MARKETING, INC.
 ADVERTISING ACCOUNT

DELIVER - FORM DVC-8 V-2

86030604295

10/5/84

PO # 12216

Balance due on P.O. #11057 for week 66
 July 20-26
 October for News for Senate

\$43.00

Advertising/Holding/fl - NPS TV Purchase

CHECK ATTACHED; RECEIPT & AFFIDAVIT REQUESTED

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

RPH

PURCHASING AGENT

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27619

No 6190

66-30
531

July 18, 84

WNCT - TV

1007.25

THE SUM IS 1007.25

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

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

86030504296

JEFFERSON MARKETING INC.
P. O. BOX 19867
RALEIGH, N. C. 27619

No 6198

06-30
531

July 18, 84

WNCN - TV

318.75

THE SUM 318.75

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11142 - To purchase TV time for Hains for Senate/ Americans for Reagan.	\$318.75

RECEIPT & AFFIDAVIT REQUESTED

86030504297

JEFFERSON MARKETING, INC.

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

No 6154

VENDOR

66-30
531

July 18, 84

WRCY-TV

867.00

THE SUMMER

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11099 - To purchase TV time for Helms for Senate.	\$867.00

RECEIPT & AFFIDAVIT REQUESTED

86030504298

BILI

JEFFERSON MARKETING INC.
P. O. BOX 19887
RALEIGH, N. C. 27619

No 6167

66-30
531

July 18, 84

WITH - TV

467.50

THE SUM 467 AND 50 PTS

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

COPY NOT NEGOTIABLE

9
2
4
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3
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6
8

JEFFERSON MARKETING INC.

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

JEFFERSON MARKETING INC.
P. O. BOX 10007
RALEIGH, N. C. 27610

No 6191

66-30
531

July 18, 84

WITH - TV

\$44.00

THE CUM 5 000

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

COPY NOT NEGOTIABLE

86030604300

JEFFERSON MARKETING INC.

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

JEFFERSON MARKETING INC.
P. O. BOX 18007
RALEIGH, N. C. 27619

No 6194

66-30
531

July 18, 84

333.75

WITN - TV

THE SUM 333.75

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

COPY NOT NEGOTIABLE

0504301
CR 60

JEFFERSON MARKETING INC.

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

P. O. BOX 19807
RALEIGH, N. C. 27618

No 6158

66-30
531

July 18, 84

476.00

WITH - TV

THE SUM 476.00 DOTS

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

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

86030604302

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27618

No 6165

$\frac{66-30}{531}$

July 18, 84

WCTI - TV

552.50

THE SUM 552.50 DOTS

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

COPY NOT NEGOTIABLE

86030504303

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11061 - To purchase TV time for Hains for Senate.	\$552.50

RECEIPT & AFFIDAVIT REQUESTED

JEFFERSON MARKETING INC.
 P. O. BOX 19807
 RALEIGH, N. C. 27619

No 6189

66-30
531

July 18, 84

WCTI - TV

654.50

THE SUM 65 21 11 5 11 05

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

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

86030504304

654.50

JEFFERSON MARKETING INC.
P. O. BOX 19007
RALEIGH, N. C. 27619

No 6196

66-30
531

July 18, 84

284.75

WGTI - TV

THE SUM 284.75

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

5
3
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DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11144 - To purchase TV time for Helms for Senate/ Americans for Reagan. RECEIPT & AFFIDAVIT REQUESTED	\$284.75

MARKETING, INC.
CAROLINA 27619

PURCHASE

6157

66-30
531

July 18, 84

WCTI - TV

786.25

THE SUM 786.25

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

COPY NOT NEGOTIABLE

04306
P
3
8

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11097 - To purchase TV time for Helms for Senate. RECEIPT & AFFIDAVIT REQUESTED	\$786.25

1

JEFFERSON MARKETING INC.
P. O. BOX 18807
RALEIGH, N. C. 27618

No 6163

$\frac{66.30}{531}$

July 18, 84

WECT - TV

684.25

THE SUN 684.25

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

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

86930504397

JEFFERSON MARKETING INC.
P. O. BOX 18807
RALEIGH, N. C. 27618

No 6107

69-30
531

July 11, 84

1126/25

WECT - TV

THE SUM I I 26 2 0 5 0 5

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/11/84	PO #10460 - To purchase TV time for Helms for Senate. RECEIPT & AFFIDAVIT REQUESTED	\$1126.25

86030504308

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27618

No 6197

66-30
531

July 18, 84

437.75

WBCT - TV

THE SUM 437.75

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11143 - To purchase TV time for Helms for Senate/ Americans for Reagan.	\$437.75
RECEIPT & AFFIDAVIT REQUESTED		

85030504309

JEFFERSON MARKETING INC.
P. O. BOX 19887
RALEIGH, N. C. 27619

No 6193

66-30
531

July 18,

84

WECT - TV

828.75

THE SUM 828.75

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

COPY NOT NEGOTIABLE

3050434.0

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11100 - To purchase TV time for Helms for Senate. RECEIPT & AFFIDAVIT REQUESTED	\$828.75

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27619

No 6164

66-30
531

July 18, 84

WRAY - TV

998.75

THE SUN 998.75

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11065 - To purchase TV time for Hains for Senate.	\$998.75

RECEIPT & AFFIDAVIT REQUESTED

86030504311

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27619

No 6108

66-30
531

July 11, 84

WHAT - TV

437.75

THE SUM 437.75 DOLLARS

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

86030504312

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

JEFFERSON MARKETING INC.
P. O. BOX 18807
RALEIGH, N. C. 27619

No 6195

66-30
531

July 18, 84

WAY - TV

459.00

THE SUM 459.00

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

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

RECEIPT & AFFIDAVIT REQUESTED

86030504313

EP

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27619

No 6155

66-30
531

July 18, 84

WYAT - TV

620.00

THE SUMMER OF '84

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

COPY NOT NEGOTIABLE

JEFFERSON MARKETING INC.

8603050431451

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

RECEIPT & AFFIDAVIT REQUESTED

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO. 11118	2623
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

VENDOR
WLOS - TV
 288 Macon Ave.
 Asheville, N.C. 28802
 Attention: Ken Glover

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 TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

ORDER DATE	DATE ORDERED	AD MARKET	FOA	PRICE REQUIRED	NO OF SAMPLES REQUIRED	ACCOUNT																											
7-16-84	7-18-84					WFS																											
PLEASE SUPPLY ITEMS LISTED BELOW						TOTAL																											
<p>To purchase :30 television time for Helms for Senate Committee.</p> <p>Ads to be announced</p> <p>Ads to run Fri. July 20, - Thur. July 26, 1984</p> <table> <tr> <td>M-F</td> <td>7-9a</td> <td>Good Morning America</td> <td>10 @100</td> <td>1000.00</td> </tr> <tr> <td>Sat.</td> <td>12-2p</td> <td>British Open Golf</td> <td></td> <td>150.00</td> </tr> <tr> <td>Sun.</td> <td>4-6p</td> <td>Aspen Tennis Festival</td> <td></td> <td>150.00</td> </tr> </table> <p style="text-align: right;">gross 1300.00</p> <p style="text-align: right;">less 15% 195.00</p> <p style="text-align: right;">net \$1105.00</p> <p>Contract # 28-444-7/20-7/22</p> <table> <tr> <td>F</td> <td>2@100</td> <td>200.00</td> </tr> <tr> <td>SA</td> <td></td> <td>150.00</td> </tr> <tr> <td>Su</td> <td></td> <td>150.00</td> </tr> <tr> <td colspan="2"></td> <td style="border-top: 1px solid black;">500.00</td> </tr> </table> <p>Advertising/Commission Purchase</p> <p><u>CHECK ATTACHE</u></p> <p><u>PRICE REQUESTED</u></p>						M-F	7-9a	Good Morning America	10 @100	1000.00	Sat.	12-2p	British Open Golf		150.00	Sun.	4-6p	Aspen Tennis Festival		150.00	F	2@100	200.00	SA		150.00	Su		150.00			500.00	
M-F	7-9a	Good Morning America	10 @100	1000.00																													
Sat.	12-2p	British Open Golf		150.00																													
Sun.	4-6p	Aspen Tennis Festival		150.00																													
F	2@100	200.00																															
SA		150.00																															
Su		150.00																															
		500.00																															

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

[Signature]
 PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

NO. 11119
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE

2623

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 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 TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

PURCHASE ORDER DATE	DATE RECEIVED	JOB NUMBER	P.O. NO.	PROOF REQUIRED	NO. OF SAMPLES REQUIRED	ACCOUNT
7-16-84	7-18-84			NO		HFS

35030504316

QUANTITY - ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
		To purchase :30 television time for Helms for Senate Committee.		
		Ads to be announced		
		Ads to run Fri. July 20, - Thur. July 26, 1984		
		M-F 7-9a Today Show	5 @ 120.	600.00 ✓
		M-F 11:30-12:30a Tonight Show	5 @ 140.	700.00 ✓
		Wed. 8-11p Baseball		600.00
		Sat. 1-7p Baseball		350.00 ✓
		Sun. 9-11:30p Movie "Shogun:"		900.00 ✓
				3150.00
		Contract # 408305		472.50
				\$2677.50
		Advertising/Hawley - H		
		<u>CHECK ATTACHED: RECEIPT</u>		

7/20 - 7/22

F 120.00 ↓
 F 140.00 ↓
 SA 350.00 ↓
 Su 900.00 ↓
1510.00

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

[Signature]
 PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO:	11002
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE	

2906

VENDOR

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

SHIP TO

Attention: Sandy Merritt

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 DATE	DATE REQUIRED	JOB NUMBER	F.O.B.	TYPE OF ORDER		NO. OF SAMPLES REQUIRED	ACCOUNT
7-9-84	7-17-84			BY	NO		HFS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL
		To purchase :30 television time for Helms for Senate Committee. Ads to be announced Ads to run Fri Jul 20 - Thru. July 26, 1984 M-F 7-9a CBS Morning News 5 @ 125. 625.00 M-F 11:30-12a WKRP 5 @ 350. 1750.00 gross 2375.00 less 15% 356.25 net \$2018.75					
		ADVERTISING, television Purchase <u>CHECK ATTACHED</u> <u>WIT REQUESTED</u>					
		$ \begin{array}{r} 125.00 \checkmark \\ 350.00 \checkmark \\ \hline 475.00 \end{array} $					

R 5 0 3 0 5 0 4 3 1 7

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

PURCHASING AGENT

VENDOR

RFB
[Signature]

JEFFERSON MARKETING, INC.

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

NO.	11041
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE	

262
2623

VENDOR
WSOC - TV
 1901 N. Tryon Rd.
 Charlotte, N.C. 28234
 Attention: Mark Johnson

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 TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

ORDER DATE	DATE ORDERED	AD NUMBER	FOR	PROOF REQUIRED	NO OF SAMPLES REQUIRED	ACCOUNT
7-10-84	7-10-84			YES		HFS
PLEASE SUPPLY ITEMS LISTED BELOW						TOTAL

8
3
1
3
0
6
0
3
0
3
8

To purchase :30 television time for Helms for Senate Committee.
 Ads to be announced
 Ads to run Fri. July 20 - Thur. July 26, 1984
 M-F 7-9a Good Morning America
 Fri. 8-11p Baseball

5 @ 200.	1000.00
	1500.00
	2500.00
	375.00
	\$2125.00

gross
 less 15%
 net

Advertising/Sell
CHECK ATTACHED:!

7/20/84
 200.00
 1500.00
 1700.00

purchase
REQUESTED

Missing entirely HSC plan instead of

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

RH
 PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER NO.	
NO.	11005
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE	

2006
-6-

VENDOR

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

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.

PURCHASE ORDER DATE		DATE REQUIRED		JOB NUMBER		JOB		PROOF REQUIRED		ACCOUNT																								
7-9-84		7-17-84						YES	NO	NO OF SAMPLES REQUIRED	HFS																							
QUANTITY ORDERED	QUANTITY REQUIRED	PLEASE SUPPLY ITEMS LISTED BELOW							UNIT PRICE	TOTAL																								
		<p>To purchase :30 television time for Helms for Senate Committee.</p> <p>Ads to be announced</p> <p>Ads to run Fri. July 20-Thurs. July 26, 1984</p> <table border="0"> <tr> <td>M-F</td> <td>7-9A</td> <td>Today</td> <td>50</td> <td>45</td> <td>225.00</td> </tr> <tr> <td>M-F</td> <td>11:30P-12:30A</td> <td>Tonight Show</td> <td>50</td> <td>125</td> <td>625.00</td> </tr> <tr> <td>Wed</td> <td>8-11P</td> <td>Baseball</td> <td></td> <td></td> <td>600.00</td> </tr> <tr> <td>Sun</td> <td>9-11P</td> <td>Shogun</td> <td></td> <td></td> <td>800.00</td> </tr> </table> <p style="text-align: right;">gross \$2250.00</p> <p style="text-align: right;">less 15% <u>337.50</u></p> <p style="text-align: right;">net \$1912.50</p>							M-F	7-9A	Today	50	45	225.00	M-F	11:30P-12:30A	Tonight Show	50	125	625.00	Wed	8-11P	Baseball			600.00	Sun	9-11P	Shogun			800.00		
M-F	7-9A	Today	50	45	225.00																													
M-F	11:30P-12:30A	Tonight Show	50	125	625.00																													
Wed	8-11P	Baseball			600.00																													
Sun	9-11P	Shogun			800.00																													
		<p>7/20 - 7/22</p> <p>45.00 ✓</p> <p>125.00 ✓</p> <p>800.00 ✓</p> <hr/> <p>970.00</p>																																
		<p>Adv</p> <p><u>CHE</u></p>																																

35030504319

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

PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

P.O. BOX 19907 • RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER	
NO.	10999
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

2906

VENDOR **WFMY-TV**
 Phillips Ave. & White St.
 P.O. Box TV2
 Greensboro, N.C. 27420
 Attn: JeffSales

SHIP TO

CLIENT (BILL TO) <p style="text-align: center;">Jefferson Marketing, Inc.</p>
--

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	DATE ENCLOSED	JOB NUMBER	FOA	PRINTER REQUIRED			NO OF SAMPLES REQUIRED	ACCOUNT
7-9-84	7-17-84			Y		ON		HPS

QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
		To purchase :30 television time for Helms for Senate Committee. Ads to be announced Ads to run Fri. July 20-Thurs. July 26, 1984 M-F 6-8A Good Morning Show Sat 4-6P Olympic Basketball vs NBA Allstars	5 @ 90 450	450.00 450.00
		gross		\$ 900.00
		less 15%		135.00
		net		\$ 765.00

05030504320

7/20 - 1/22
 90.00 ✓
 450.00 ✓

 540.00

Advertising,
CHECK ATTACH

Commission Purchase
NET REQUESTED

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

RPH

PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

NO. 10997
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.

2906

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

SHIP TO

Attention: Tommy 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 TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

PURCHASE ORDER DATE		DATE INCURRED		JOB NUMBER		P.O.#		PROOF REQUIRED		ACCOUNT	
7-9-84		7-17-84						Y	N	NO. OF SAMPLES REQUIRED	HPS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW:								UNIT PRICE	TOTAL
		To purchase :30 television time for Helms for Senate Committee. Ads to be announced Ads to run Fri Jul 20 - Thur. July 26, 1984 M-F 7-7:30p WKRP 3 @ 100. 300.00 M,T 8-10p Camelot Special 2 @ 200. 400.00 M-F 7-9a CBS Morning News 5 500.00									
										gross	700.00
										less 15%	105.00
										net	\$595.00
		Advertising/Seiber/fl - HPS - Tel:									
		<u>CHECK ATTACHED RECEIPT & AFFIDAVIT</u>									

050304321

7/20 7/22

100.00

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

PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO.	11000
THE NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE	

2906

VENDOR

WXII-TV
 700 Coliseum Dr.
 P.O. Box 11847
 Winston Salem, N.C. 27106
 Attn: Zack 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 FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.

MAIL INVOICE IN TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

PLACEMENT ORDER DATE	DATE RECEIVED	AD NUMBER	F.O.B.	PROOF REQUIRED		NO. OF SAMPLES REQUIRED	ACCOUNT
7-9-84	7-17-84			Y	N		HFF
QUANTITY ORDERED	QUANTITY RECEIVED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL
		To purchase :30 television time for Helms for Senate Committee. Ads to be announced Ads to run Fri. July 20-Thurs. July 26, 1984 M-F 7-9A Today \$ 0 500 250.00 M-F 11:30P-12:30A Tonight Show \$ 0 100 500.00 Sun 9-11P Shogun 900.00 Wed. 8-11P Baseball 500.00					
		gross					\$2150.00
		Less 15%					322.50
							\$1827.50
		Advertising/Seiber - HFF CHECK ATTACHED: RECEIPT					

85030504322

7/20- 7/22
 500.00 ✓
 100.00 ✓
 900.00 ✓
 1,050.00 ✓

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

PURCHASING AGENT

VENDOR

RPB

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO.	11001
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE	

2806
16

VENDOR

WCHP - 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 PURCHASE ORDER

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

PURCHASE ORDER DATE	DATE REQUIRED	JOB NUMBER	F.O.B.	PROOF REQUIRED		NO OF SAMPLES REQUIRED	ACCOUNT
7-9-84	7-17-84			YES	NO		HFS

36030504323

PLEASE SUPPLY ITEMS LISTED BELOW

To purchase :30 television time for Helms for Senate Committee.

Ads to be announced

Ads to run Fri. July 20 - Thur. July 26, 1984

DAY	TIME	PROGRAM	UNIT PRICE	TOTAL
M-F	7-9a	Good Morning America	10 @ 75.	750.00
Fri.	8p-9c	Baseball		790.00
Mon.	8-11p	Baseball		850.00
Thur.	8-11p	Olympic Gala		1500.00
Sun.	11a-1p	British Open Final		350.00

gross 4240.00
less 15% 636.00

\$3604.00

7/20 7/22

Advertising/Seiber/fl

CHECK ATTACHED: RECEIPT

75.00 ✓
75.00 ✓
790.00 ✓
350.00 ✓

1,290.00

Purchase
FED

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

PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO. 11166	2623
THE NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE	

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.

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

PURCHASE ORDER DATE	DATE REQUIRED	JOB NUMBER	FOA	PROOF REQUIRED	NO OF SAMPLES REQUIRED	ACCOUNT															
7-18-84	7-18-84			YES		HFS															
						UNIT PRICE															
<p>To purchase :30 television time for Helms for Senate Committee.</p> <p>Ads to be announced</p> <p>Ads to run Fri. July 20 @ Thur. July 27, 1984</p> <table border="0"> <tr> <td>M-F</td> <td>7-9a</td> <td>Good Morning America</td> <td>10 @ 225</td> <td>2250.00</td> </tr> <tr> <td>Mon.</td> <td>9-cc</td> <td>Baseball</td> <td></td> <td>800.00</td> </tr> <tr> <td>Tue.</td> <td>8-10p</td> <td>Movie "Nadia"</td> <td></td> <td>900.00</td> </tr> </table> <p>gross 3950.00</p> <p>less 15% 592.50</p> <p>net \$3357.50</p>						M-F	7-9a	Good Morning America	10 @ 225	2250.00	Mon.	9-cc	Baseball		800.00	Tue.	8-10p	Movie "Nadia"		900.00	TOTAL
M-F	7-9a	Good Morning America	10 @ 225	2250.00																	
Mon.	9-cc	Baseball		800.00																	
Tue.	8-10p	Movie "Nadia"		900.00																	
<p>9/30 - 7/22</p> <p>225.00</p> <p>225.00</p> <p>450.00</p> <p>- HFS - TV Purchase</p> <p><u>PT & AFFIDAVIT REQUESTED</u></p>																					

36030504324

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

[Signature]
PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

P.O. BOX 10607 • RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER	
NO. 11116	2623
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

VENDOR WPTS - TV
 410 S. Salisbury St.
 Raleigh, N.C. 27710
 Attention: Bob Buselli

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

PURCHASE ORDER DATE	DATE REQUIRED	JOB NUMBER	J.O.B.	PROOF REQUIRED		NO OF SAMPLES REQUIRED	ACCOUNT																																																								
7-16-84	7-18-84			Y	N		HFS																																																								
QUANTITY ORDERED	QUANTITY ORDERED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL																																																								
<p>To purchase :30 television time for Helms for Senate Committee.</p> <p>Ads to be announced</p> <p>Ads to run Fri. July 20, - Thur. July 26, 1984</p> <table border="0"> <tr> <td>M-F</td> <td>11:30-12:30a</td> <td>Tonight Show</td> <td>5 @ 15.</td> <td>75.00</td> <td></td> <td></td> </tr> <tr> <td>M-F</td> <td>7-9a</td> <td>Today Show</td> <td>5 @ 15.</td> <td>75.00</td> <td></td> <td></td> </tr> <tr> <td>M,W</td> <td>7:30-8p</td> <td>WKRP</td> <td>2 @ 125.</td> <td>250.00</td> <td></td> <td></td> </tr> <tr> <td>Sun.</td> <td>9-11:30p</td> <td>Movie "Shogun"</td> <td></td> <td>450.00</td> <td></td> <td></td> </tr> <tr> <td>Wed.</td> <td>8-11p</td> <td>Baseball</td> <td></td> <td>250.00</td> <td></td> <td></td> </tr> <tr> <td colspan="4"></td> <td>gross</td> <td>1100.00</td> <td></td> </tr> <tr> <td colspan="4"></td> <td>less 15%</td> <td>110.00</td> <td></td> </tr> <tr> <td colspan="4"></td> <td>net</td> <td>\$ 935.00</td> <td></td> </tr> </table>							M-F	11:30-12:30a	Tonight Show	5 @ 15.	75.00			M-F	7-9a	Today Show	5 @ 15.	75.00			M,W	7:30-8p	WKRP	2 @ 125.	250.00			Sun.	9-11:30p	Movie "Shogun"		450.00			Wed.	8-11p	Baseball		250.00							gross	1100.00						less 15%	110.00						net	\$ 935.00		
M-F	11:30-12:30a	Tonight Show	5 @ 15.	75.00																																																											
M-F	7-9a	Today Show	5 @ 15.	75.00																																																											
M,W	7:30-8p	WKRP	2 @ 125.	250.00																																																											
Sun.	9-11:30p	Movie "Shogun"		450.00																																																											
Wed.	8-11p	Baseball		250.00																																																											
				gross	1100.00																																																										
				less 15%	110.00																																																										
				net	\$ 935.00																																																										
<p>Contract # 67: 7/20 ^{7/22}</p> <p>Advertising/Bawl</p> <p><u>CHECK ATTACHED:RE</u></p> <p><i>15.00 ✓</i> <i>15.00 ✓</i> <i>+50.00</i> <i>+80.00</i></p>																																																															
<p>Purchase REQUESTED</p>																																																															

85030504325

NO CHANGES WILL BE BINDING ON CLIENT LISTED ON TH PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS G

RKH
 PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

P.O. BOX 19007 RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER	
NO. 11117	2623
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

VENDOR

WTVE - TV
 411 Liberty St.
 Durham, N.C. 27710
 Attention: Chuck Martin
~~To purchase 120 television time for Helms~~

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

PURCHASE ORDER DATE	DATE RECEIVED	JOB NUMBER	JOB	PROOF REQUIRED		ACCOUNT
7-16-84	7-18-84			NO	NO	HPS

QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
------------------	------------------	----------------------------------	------------	-------

350305043325

To purchase :30 television time for Helms for Senate Committee.

Ads to be announced

Ads to run Fri. July 20, - Thur. July 26, 1984

M-F	7-9a	CBS Morning News	5 @ 50.	250.00
-----	------	------------------	---------	--------

37.50

\$212.50

*n/20 - 7/22
50.00 ↓*

Advertising/Hawley - HPS - TV 1

CHECK ATTACHED: RECEIPT & AFFIDAVIT

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


 PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

P.O. BOX 19907 • RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER:	
NO. 11057	2623
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE	

VENDOR
WNCT - WF
 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.

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

PURCHASE ORDER DATE	DATE RECEIVED	JOB NUMBER	F.O.B.	PROOF REQUIRED		NO. OF SAMPLES REQUIRED	ACCOUNT
7-10-84	7-17-84			Y	N		HFS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL
		To purchase :30 television time for Helms for Senate Committee. Ads to be announced Ads to run Fri. July 20 through Thur. July 26, 1984 Sat. 4-6p CBS Sports 85.00 F,M-Th 8-9a CBS Morning Nws 5 @ 40. 200.00 gross 285.00 less 15% 42.75 net 109.25 242.25 Advertising/Dan Chase CHECK ATTACHED: R <u>JUSTED</u>					
		7/20 - 7/22 85.00 ✓ 40 ✓ 125.00					

35730504327

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

RPA
 PURCHASING AGENT

VENDOR

MOLINA 27619

PURCHASE ORDER
 NO. **11056**
 THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.

262

VENDOR WITH - TV
 Highway 17 South
 Washington, N.C. 27889
 Attention: Frank Brady

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

PURCHASE ORDER DATE	DATE REQUIRED	JOB NUMBER	T.O. NO.	PROOF REQUIRED	NO OF SAMPLES REQUIRED	ACCOUNT																				
7-10-84	7-10-84					HFS																				
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW			UNIT PRICE	TOTAL																				
		<p>To purchase :30 television time for Helms for Senate Committee.</p> <p>Ads to be announced</p> <p>Ads to run Fri. July 20 - Thur. July 26, 1984</p> <table> <tr> <td>F,M-Th</td> <td>7-9a</td> <td>Today Show</td> <td>5 @ 30.</td> <td>150.00</td> </tr> <tr> <td>F,M-Th</td> <td>11:30-12:30a</td> <td>Tonight Show</td> <td>5 @ 35.</td> <td>175.00</td> </tr> <tr> <td>Sat.</td> <td>1-4p</td> <td>Michigan 500</td> <td></td> <td>100.00</td> </tr> <tr> <td>Sat.</td> <td>4p-cc</td> <td>Major League baseball</td> <td></td> <td>125.00</td> </tr> </table> <p>gross 550.00</p> <p>less 15%</p> <p>net \$467.50</p>			F,M-Th	7-9a	Today Show	5 @ 30.	150.00	F,M-Th	11:30-12:30a	Tonight Show	5 @ 35.	175.00	Sat.	1-4p	Michigan 500		100.00	Sat.	4p-cc	Major League baseball		125.00		
F,M-Th	7-9a	Today Show	5 @ 30.	150.00																						
F,M-Th	11:30-12:30a	Tonight Show	5 @ 35.	175.00																						
Sat.	1-4p	Michigan 500		100.00																						
Sat.	4p-cc	Major League baseball		125.00																						
		<p>Advertising/Dawson/fl - 7/20 7/22</p> <p>7/20 30.00 ✓ 35.00 ✓ 100.00 ✓ 125.00 ✓ 290.00</p> <p>F F 5A 5A</p>																								
		<p><u>CHECK ATTACHED: RECE</u></p>																								

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

RPH
 PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO. 11061	2623
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

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

SHIP TO

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

PURCHASE ORDER DATE	DATE REQUIRED	JOB NUMBER	P.O.#	PROOF REQUIRED		NO OF SAMPLES REQUIRED	ACCOUNT
7-11-84	11-17-84			SAMPLE	ON		HFS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL
		To purchase :30 television time for Helms for Senate Committee. Ads to be announced Ads to run Fri. July 20 - Thur. July 26, 1984 F,M-Th 7-9a Good Morning America Thur. 8-cc Olympic Game Sat. 5-6:30p Wide World of Sports <div style="text-align: right;"> gross 650.00 less 15% 97.50 net \$552.50 </div>					
		Advertising/Dawson/fl - <u>CHECK ATTACHED: RECEIPT &</u>					

95030504329

7/20 - 7/22
 re 35 minutes 70.00
 FR SA
 60.00
 30.00

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

RPH
 PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

P.O. BOX 19807 RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER NO. 11067
 THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE

VENDOR WECT - TV
 322 Shipyard Blvd.
 Wilmington, N.C. 28403

SHIP TO

Attention: Ann 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 TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

PURCHASE ORDER DATE		DATE REQUIRED		JOB NUMBER		FOA		PROOF REQUIRED		ACCOUNT					
QUANTITY ORDERED		QUANTITY SHIPPED		PLEASE SUPPLY ITEMS LISTED BELOW								NO OF SAMPLES REQUIRED		TOTAL	
7-12-84		7-12-84										HPS			
				To purchase :30 television time for Helms for Senate Committee. Ads to be announced Ads to run Fri. July 20 - Thur. July 26, 1984 SUNXXXXX XXXXXX SUNXX M-Th 11:30-12:30a Sports World P,M,Th 7-9a Tonight Show Wed. 8p-cc Today Show Baseball								80x00			
												80.00 ✓			
												4 @ 50. 200.00			
												5 @ 45. 225.00			
												300.00			
												gross 805.00			
				7/20 7/22 80.00 45.00								less 15%		121.00	
												net		\$684.00	
				Advertising/1 <u>CHECK ATTACH</u> 80.00 ✓ 45.00 ✓ <u>125.00</u>								Purchase		T REQUESTED	

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

R/H

PURCHASING AGENT

VENDOR

JEFFERSON

PO BOX 10001 RALEIGH NORTH CAROLINA 27610

PURCHASE ORDER	
NO.	11005
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

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

SHIP TO

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.

PURCHASE ORDER DATE		DATE REQUIRED		JOB NUMBER	F.O.B.		PROOF REQUIRED		ACCOUNT																					
7-12-84		7-12-84			Y		N		NO OF SAMPLES REQUIRED HPS																					
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW						UNIT PRICE	TOTAL																					
		<p>To purchase :30 television time for Helms for Helms for Senate Committee.</p> <p>Ads to be announced Ads to run Fri. July 20 - Thur. July 26, 1984</p> <table border="0"> <tr> <td>Mon.</td> <td>8p-cc</td> <td>Monday Baseball</td> <td rowspan="5">10 @ 30</td> <td rowspan="5">225.00</td> </tr> <tr> <td>F,M-Th</td> <td>7-9a</td> <td>Good Morning America</td> <td>300.00</td> </tr> <tr> <td>Thur.</td> <td>8p-cc</td> <td>ABC Sports Olympic Gala</td> <td>325.00</td> </tr> <tr> <td>Fri.</td> <td>8-11:30p</td> <td>Baseball</td> <td>250.00</td> </tr> <tr> <td>Sat.</td> <td>5-6:30p</td> <td>Wide World of Sports</td> <td>75.00</td> </tr> </table>						Mon.	8p-cc	Monday Baseball	10 @ 30	225.00	F,M-Th	7-9a	Good Morning America	300.00	Thur.	8p-cc	ABC Sports Olympic Gala	325.00	Fri.	8-11:30p	Baseball	250.00	Sat.	5-6:30p	Wide World of Sports	75.00		
Mon.	8p-cc	Monday Baseball	10 @ 30	225.00																										
F,M-Th	7-9a	Good Morning America			300.00																									
Thur.	8p-cc	ABC Sports Olympic Gala			325.00																									
Fri.	8-11:30p	Baseball			250.00																									
Sat.	5-6:30p	Wide World of Sports			75.00																									
								Gross	1175.00																					
								less 15%	176.80																					
								net	\$ 999.00																					
		<p>Advertising/Daw</p> <p><u>CHECK ATTACHED:</u></p>																												

3503050433

Handwritten notes:
 7/20 - 7/22
 2030 - 60.00 ✓
 2500 ✓
 75.00 ✓
 385.00 ✓
 F.F.S.A
 purchase
 TESTED

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

Handwritten initials: JH

PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO.	10945
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

VENDOR **WLOS - TV**
 288 Macon Ave.
 Asheville, N.C. 28802

SHIP TO

Attention: Kln 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.

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

START DATE	END DATE	AD NUMBER	FOR	PROOF REQUIRED		NO OF SAMPLES REQUIRED	ACCOUNT																									
7-5-84	7-5-84			Y	N		HPS																									
QUANTITY ORDERED	QUANTITY RECEIVED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL																									
		To purchase :30 television time for Helms for Senate Committee. Ads to be announced Ads to run Mon. July 16 - Sun. July 22, 1984 <table border="0"> <tr> <td>M,W,F</td> <td>7-9a</td> <td>Good Morning America</td> <td>3 @ 100.</td> <td>300.00</td> </tr> <tr> <td>M-F</td> <td>12:30-4p</td> <td>PM Rotation</td> <td>5 @ 150.</td> <td>750.00</td> </tr> <tr> <td>Sun.</td> <td>12.30-1p</td> <td>Newsmakers</td> <td></td> <td>30.00</td> </tr> <tr> <td>Tue.</td> <td>82-12:30a</td> <td>Nightline</td> <td></td> <td>30.00</td> </tr> <tr> <td>Thur.</td> <td>7-7:30p</td> <td>Tic Tac Dough</td> <td></td> <td>350.00</td> </tr> </table>				M,W,F	7-9a	Good Morning America	3 @ 100.	300.00	M-F	12:30-4p	PM Rotation	5 @ 150.	750.00	Sun.	12.30-1p	Newsmakers		30.00	Tue.	82-12:30a	Nightline		30.00	Thur.	7-7:30p	Tic Tac Dough		350.00		
M,W,F	7-9a	Good Morning America	3 @ 100.	300.00																												
M-F	12:30-4p	PM Rotation	5 @ 150.	750.00																												
Sun.	12.30-1p	Newsmakers		30.00																												
Tue.	82-12:30a	Nightline		30.00																												
Thur.	7-7:30p	Tic Tac Dough		350.00																												
				gross	1460.00																											
				less 15t	219.00																											
				net	\$1241.00																											
		Advertisi	100.00 ✓	television Purchase																												
			150.00 missed																													
			30.00 ✓																													
		<u>CHECK ATT</u>	<u>280.00</u>	<u>DAVIT REQUESTED</u>																												

35030504332

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

RPH
PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO.	10947
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

VENDOR

WSPA - TV
I-85 & I-26
Spartanburg, N.C. 29304

SHIP TO

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.

PURCHASE ORDER DATE	DATE ORDERED	AD ORDER	P.O.#	YES	NO	NO. OF SAMPLES REQUIRED	ACCOUNT
7-5-84	7-5-84						RFS

PLEASE SUPPLY PRICES LISTED BELOW

35030304333

To purchase :30 television time for Helms for Senate Committee.

Ads to be announced

Ads to run Mon. July 16 - Sun. July 22, 1984

M-F	12:30-4p	PM Rotation	5 @ 250.	1250.00
			less 15%	187.50
			net	\$1062.50

7/20 - 7/22

Advertiser

250.00 ✓

television Purchase

CHECK ATTA

AVIT REQUESTED

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

PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

P.O. BOX 19907 • RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER	
NO.	10946
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE	

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 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	DATE RECEIVED	JOB NUMBER	F.O.B.	PROOF REQUIRED		NO. OF SAMPLES REQUIRED	ACCOUNT
7-5-84	7-5-84			Y	N		HPS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL
35030501334		<p>To purchase :30 television time for Helms for Senate Committee.</p> <p>Ads to be announced</p> <p>Ads to run Mon. July 16 - Sun. July 22, 1984</p> <p>TTWThT, w, Th 7-9a Today Show 3 @ 120 360.00</p> <p>M-F 12:30-3:30p PM Rotation 10 @ 260. 2600.00</p> <p>M,F 9-10a Donahue 2 @ 185. 370.00</p> <p>gro</p> <p>grossgross 330.00</p> <p>less 15% 499.80</p> <p>net 2830.50</p> <p>7/20 - 7/22</p> <p>260.00 ✓</p> <p>260.00 ✓</p> <p>185.00 ✓</p> <p>705.00</p> <p>Advertising/Hi</p> <p>tion Purchase</p> <p>REQUESTED</p>					
		<u>CHECK ATTACHED</u>					

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

PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO. 10939	2905
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

VENDOR **WBTW**
 1 Julian Price Place
 Charlotte, N.C. 28208

SHIP TO

Attention: Sandy Merritt

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 DATE	DATE RECEIVED	JOB NUMBER	F.O.B.	QUANTITY REQUIRED	ACCOUNT
7-5-84	7-5-84				HFS

PLEASE SUPPLY ITEMS LISTED BELOW

To purchase :30 television time for Helms for Senate Committee.

Ads to be announced

Ads to run Mon. July 16 - Sun. Aug. 12, 1984

DESCRIPTION	QUANTITY	UNIT PRICE	TOTAL
(2) M, T, W, Th 12:30-4p PM Rotation	7 @	275	1925.00
(2) F			
M-F 11:30-12:30p Top of the Day	5 @	225	1125.00
M-Th 4-5p Little House	4 @	400	800.00
M, T, Th 7-9a CBS Morning News	3 @	125	375.00
M, W, F 6-7a Good Morning Show	3 @	65	195.00
T, Th 5-6p Hawaii 5-0	2 @	275	550.00

gross 4970.00

7/20 - 7/22 less 15% 745.00

net 4224.50

This is a

275.00 ✓
 275.00 ✓
 225.00 ✓
 65.00 ✓
840.00

be repeated

5-22

5-29

9- Aug. 5

-12

Weekly pa

Advertisi

CHECK AT

levision Purchase

DAVIT REQUESTED

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

ALC RPH
 PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO. 10922	2905
THE NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

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

SHIP
 TO

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 PURCHASE ORDER.

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

PURCHASE ORDER DATE	DATE SHIPPED	JOB NUMBER	JOB	YES	NO	NO. OF SAMPLES REQUIRED	ACCOUNT
7-5-84	7-5-84						HFS

36030504335

QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
		To purchase television time for Helms for Senate committee.		
		Ads to be announced		
		Ads to run Mon. July 16 - Sun. Aug 12, 1984		
		F, Sa, Su 2-6a News All Night	3 @ 10	30.00
		M, F 7-9a Good Morning America	2 @ 200.	400.00
		gross		430.00
		less 15%		64.50
		net		\$365.50
		This is a weekly schedule to be repeated		
		July 16-22		
		July 23-29		
		July 30-Aug. 5		
		Aug. 6-12		
		Weekly payment of \$ 365.50		
		Advertising/Seiber - HFS - Television Purc		
		<u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUEST</u>		

7/22 - 7/22
 10.00 30.00
 10.00 200.00
 MISSED 230.00
 10.00

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

[Signature]
 PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

NO. 10995-2905
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE

VENDOR

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

SHIP TO

Attention: 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 PURCHASE ORDER.

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

PURCHASE ORDER DATE	DATE RECEIVED	QUANTITY	FOA	PROOF REQUIRED	NO OF SAMPLES REQUIRED	ACCOUNT
7-9-84	7-9-84			YES		HPS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW			UNIT PRICE	TOTAL
		<p>To purchase :30 television time for Helms for Senate Committee.</p> <p>Ads to be announced 7/16 - 7/22</p> <p>Ads to run 7/16 - 7/22 16 Jan. 22 7/20 - 7/22 1984</p> <p>N-F 9a-2p Day Rotation 10 @ 50. 500.00</p> <p>less 150 75.00</p> <p>net \$425.00</p> <p>This is a weekly schedule to be repeated</p> <p>July 16-22 July 23-29 July 30-Aug. 5 Aug. 6-12</p> <p>Weekly payment of \$ 425.00</p> <p>Advertising/Seiber/fl HPS - Television P</p> <p><u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUE</u></p>				
					50.00 ✓ 50.00 ✓ 100.00	

35030504337

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

IAS RPH
PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

P.O. BOX 18887 • RALEIGH, NORTH CAROLINA 27619


PURCHASE ORDER	
NO.	10916
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

2905

VENDOR **WCCB - TV**
 1 Television Place
 Charlotte, N.C. 28205

SHIP TO

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.

PURCHASE ORDER DATE	DATE FULFILLED	JOB NUMBER	P.O.#	Y	N	NO. OF SAMPLES REQUIRED	ACCOUNT
7-5-84	7-5-84						IPS

05030504333

QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
		To purchase :30 television time for Helms for Senate Committee.		
		Ads to be announced		
		Ads to run Mon. July 16 - Sun. August 12, 1984		
		Sun. 4-6p Sun. Big Time Movie		120.00
		Sat. 9-10a Gunsmoke		50.00
		Sun. 2-4p Sun. Cinema		100.00
		Sun. 6-7p Switch		120.00
			gross	390.00
			less 150	58.50
			net	\$ 331.50
		This is a	repeated	
		120.00	22	
		50.00	29	
		100.00	Aug. 8	
		120.00	22	
		<u>390.00</u>		
		Weekly pay:		
		Advertisin:	vision Purchase	
		<u>CHECK ATTA</u>	<u>AVIT REQUESTED</u>	

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

HA's RPH
 PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER
 NO. **11058** 2905
 THE NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE

VENDOR
 - WPMY - TV
 - Phillips Ave & White St.
 - Greensboro, N.C. 27420
 - Attention: Jeff Sales

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 TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

PURCHASE ORDER DATE	DATE RECEIVED	JOB NUMBER	P.O.#	QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL	ACCOUNT																																		
7-11-84	7-11-84								HFS																																		
<p>To purchase :30 television time for Helms for Senate Committee.</p> <p>Ads to be announced</p> <p>Ads to run Mon. July 16 - Sun. Aug. 5, 1984</p> <table border="0"> <tr> <td>M-F</td> <td>6-8a</td> <td>Good Morning Show</td> <td>5 @ 90.</td> <td>450.00</td> </tr> <tr> <td>M-F</td> <td>8-9a</td> <td>Morning Rotation</td> <td>5 @ 45.</td> <td>225.00</td> </tr> <tr> <td>M-F</td> <td>3:58-4p</td> <td>Weatherbreak</td> <td>2 @ 125.</td> <td>250.00</td> </tr> <tr> <td>M-Th</td> <td>9-12n</td> <td>Morning Rotation</td> <td>4 @ 85.</td> <td>340.00</td> </tr> <tr> <td>(2)M,T, W,TH,(2)F</td> <td>12-4p</td> <td>PM Rotation</td> <td>7 @ 130.</td> <td>910.00</td> </tr> <tr> <td>Sun.</td> <td>7-9a</td> <td>Religion</td> <td>2 @ 40.</td> <td>80.00</td> </tr> <tr> <td>Fri.</td> <td>2-6a</td> <td>Movies</td> <td></td> <td>10.00</td> </tr> </table> <p style="text-align: right;">Gross 222 less 15% 2265.00 net 339.75</p> <p style="text-align: right;">\$1925.25</p>							M-F	6-8a	Good Morning Show	5 @ 90.	450.00	M-F	8-9a	Morning Rotation	5 @ 45.	225.00	M-F	3:58-4p	Weatherbreak	2 @ 125.	250.00	M-Th	9-12n	Morning Rotation	4 @ 85.	340.00	(2)M,T, W,TH,(2)F	12-4p	PM Rotation	7 @ 130.	910.00	Sun.	7-9a	Religion	2 @ 40.	80.00	Fri.	2-6a	Movies		10.00		
M-F	6-8a	Good Morning Show	5 @ 90.	450.00																																							
M-F	8-9a	Morning Rotation	5 @ 45.	225.00																																							
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Sun.	7-9a	Religion	2 @ 40.	80.00																																							
Fri.	2-6a	Movies		10.00																																							
<p>This is a week</p> <p>Weekly payment Advertising/</p> <p><u>CHECK ATTACH</u></p>																																											
<p>9/30 7/22</p> <p>90.00 ✓ 345.00 ✓ 125.00 ✓ 130.00 ✓ 130.00 ✓ 40.00 80.00 ✓ 10.00 ✓</p> <p>610.00</p>																																											
<p>repeated July 23-29 July 30-Aug. 5</p> <p>purchase</p> <p><u>IT REQUESTED</u></p>																																											

35030504339

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

JAS RPH
 PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

NO. **11059** 2905

THE NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE

VENDOR
WXII - TV
 700 Coliseum Dr.
 Winston Salem, N.C. 27106
 Attention: Zack 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 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	DATE RECEIVED	JOB NUMBER	FOA	PROOF REQUIRED		NO. OF SAMPLES REQUIRED	ACCOUNT
7-11-84	7-11-84			BY	NO		HPS

QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
		To purchase :30 television time for Helas for Senate Committee.		
		Ads to be announced		
		Ads to run Mon. July 16 - Sun. Aug. 12, 1984		
		M-F 11-12n Wheel/Scrabble	5 @ 40.	200.00
		Th-F 12n Noon News	4 @ 90.	360.00
		M 12:30-3p NBC PM Rotation		115.00
		gross		675.00
		less 15%		101.25
		net		\$ 573.75
		This is a <i>7/20. 7/22</i> be repeated		<i>573.75</i>
		July 16-22		
		July 23-29		
		Aug 5-Aug. 5		
		Aug. 6-12		
		Weekly ps		
		Advertisi		
		<u>CHECK AT!</u>		
		levision Purchase		
		<u>DAVIT REQUESTED</u>		

35030504310

*did not
 run this 90.00
 Gross
 130.00
 Run 1100, 970 P.O.
 one*

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

HE RPH
 PURCHASING AGENT

VENDOR

WYNMAN BROTHERS, INC.
 P.O. BOX 19807 • RALEIGH, NORTH CAROLINA 27619

NO. 10949
 THIS ORDER IS VALID FOR ALL
 INVOICES PACKAGES AND COMPS
 EXCEPTED

VENDOR

SHIP TO

WYN - TV
 3500 Myer-Lee Drive
 Winston Salem, N.C. 27101
 Attention: Tony Holloway

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 TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

PURCHASE ORDER DATE	DATE REQUIRED	JOB NUMBER	JOB	PROOF REQUIRED		NO OF SAMPLES REQUIRED	ACCOUNT
7-9-84	7-9-84						NFS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL
		To purchase :30 television time for Helms for Senate Committee. XXXXXXXXXXXXXXXXXXXX Ads to run Tue. July 10 - Mon. July 30, 1984 M, W, F 7-8p Little House 3/week 9 @ 70. 630.00 Sun. 7/15 3:30-6p Movie "Take This Job And Shove It" / 3 @ 70. 210.00 Wed. 7/18 9-11p Movie 2 @ 400. 800.00 Thur. 7/19 . . . Gross 1640.00 less 15% 246.00 net \$1394.00					
		Ad to run NFS 811 J.T. KERRY . . . Advertising/Selber/fl - NFS 0 Tel <u>CHECK ATTACHED: RECEIPT & AFFIDAVIT</u>					

1
3
4
5
0
5
0
3
0
5
0

7/20 - 7/22
 70.00
 70.00
 140.00

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

[Handwritten Signature]
 PURCHASING AGENT

CLIENT

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO. 11060	2905
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

VENDOR **WGHP - TV**
 2005 Francis St.
 High Point, N.C. 27261
 Attention: **Christie Davis**

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

QUANTITY ORDERED	DATE REQUIRED	JOB NUMBER	F.O.B.	PROOF REQUIRED	NO. OF SAMPLES REQUIRED	ACCOUNT
7-11-84	7-11-84					HPS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW			UNIT PRICE	TOTAL
35030504342		To purchase :30 televisionmontime for Helms for Senate Committee. Ads to be announced Ads to run Mon. July 16 - Sun. Aug. 12, 1984 Sun. 7-11a Religion 2 @ 30. 60.00 Sat. 12m-2a Sat. Movie Thriller 30.00 M,T,F 12n Noon News 3 @ 75. 225.00 Sun. 1-2p Grizzly Adams 75.00 M,W,F 6-7a ABC News Morning 3 @ 20. 60.00 gross 450.00 less 15% 67.50 net \$382.50				
		7/30 - 7/22 schedule to be repeated July 16-22 July 23-29 July 30- Aug. 5 Aug. 6-12 82.50 HPS - Television Purchase PT & AFFIDAVIT REQUESTED				
		60 - ✓ 30 - ✓ 75 - ✓ - 75 - 20 - ✓ 260.00				

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

TAS RPH
 PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

P.O. BOX 18807 • RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER	
NO.	11063
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE	

VENDOR

WRAL - TV
2619 Western Blvd.
P. O. Box 1200
Raleigh, N. C. 27605
Attn. Quinn Knotts

SHIP TO

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 INVOICE IN TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

PURCHASE ORDER DATE		DATE RECEIVED		JOB NUMBER		T.O.#		PRICE REQUIRED		ACCOUNT	
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW						NO. OF SAMPLES REQUIRED	UNIT PRICE		TOTAL
7-11-84	7-11-84										
		<p>To purchase :30 television time for Helms for Senate Committee.</p> <p style="text-align: center;">Ads to be announced</p> <p>Ads to #m Mon. July 16 - Sun. July 22, 1984</p> <p>Sun 6a-12p Sun Morn Religion 2 @ 35 70.00</p> <p>Sun 9-10a Waltens 1 @ 100 100.00</p> <p>Sun - 5-6p Waltens 1 @ 250 250.00</p> <p>M-F 6:45-7a Country Morn 5 @ 100 500.00</p> <p style="text-align: right;">gross 920.00</p> <p style="text-align: right;">less 15% 138.00</p> <p style="text-align: right;">net 782.00</p>									
9	5	<p><i>7/20 - 7/22</i></p> <p style="text-align: right;">70.00 ✓</p> <p style="text-align: right;">100.00 ✓</p> <p style="text-align: right;">250.00 ✓</p> <p style="text-align: right;">100.00 ✓</p> <p style="text-align: right;">520.00</p> <p>Advertiser <i>MISSEA</i> MISSA <i>100.00</i></p> <p>CHECK ATTA MISSA <i>520.00</i></p> <p style="text-align: right;">MISSA</p>									

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

PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER

NO. 11010

2905

THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE

VENDOR
WPTF-TV
410 S. Salisbury 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 TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

PURCHASE ORDER DATE	DATE INCURRED	FOR MONTH	FOR YEAR	PRORATA REQUIRED		NO OF SAMPLES REQUIRED	ACCOUNT
7-9-84	7-12-84			Y	N		HFS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL
		To purchase :30 television time for Helms for Senate Committee. Ads to be announced Ads to run Mon. July 16-Thurs. July 22, 1984 M-F 10-3P Day Rotation 15@ 15 225.00 M-F 11:30-12:30A Tonight Show 5 @15 75.00 M,Th,F 6:30-7A 20 Min Workout 3@ 10 30.00					
						gross	\$ 330.00
						less 15@	49.50
						net	\$ 280.50
						7/20-7/22 15.00 ✓ 15 - ✓ 15 - ✓ 15 - ✓ 10 - ✓ ----- 70.00	
		<u>Advertisi</u>				<u>levision Purchase</u>	
		<u>CHECK AMT</u>				<u>PAID REQUESTED</u>	

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

[Signature]
PURCHASING AGENT

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO.	11062-1905
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

VENDOR
 WTVD - TV
 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

PROGRAM ORDER DATE	DATE REQUIRED	QUANTITY	FOA	PRICE REQUIRED	NO. OF SAMPLES REQUIRED	ACCOUNT
7-12-84	7-12-84					HPS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW			UNIT PRICE	TOTAL
		To purchase :30 television time for Helms for Senate Committee. Ads to be announced M, Tu, F 12-12:30p News 3 @ 240. 720.00 620.00 less 15% net 508.00 7/20 7/22 240.00 Advertising/ <i>Picked up in check</i> TV Purchase				720.00 108.00 <hr/> 612.00
<u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>						

95030501345

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

AS _____ *ADH*
 PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER		2905
NO.	10944	
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.		

VENDOR
 WTVD - TV
 411 Liberty St.
 Durham, N.C. 27702

SHIP
 TO

Attention: Flora Norris

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 TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

PURCHASE ORDER DATE	DATE ORDERED	JOB NUMBER	FOA	PRICES REQUIRED		NO. OF SAMPLES REQUIRED	ACCOUNT
7-5-84	7-5-84			Y	N		HFS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL
		To purchase :30 television time for Helms for Senate Committee Ads to be announced Ads to run Mon. July 16 - Sun. July 22, 1984 M-F 9-12p 12pAM Rotation M,T 9-10a Donahue W,Th 12-12:30p News M-F 12:30-4p PM Rotation				5 @ 140. 700.00 2 @ 120. 240.00 2 @ 250. 480.00 5 @ 280. 1400.00	
						gross	2820.00
						less 15%	423.00
						net	\$2397.00
		Advertising/Hi Television Purchase					
		<u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>					

35030604346

7/20 7/22
 140 -
 280 -
 420

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

PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

NO. 10941
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE

2905

VENDOR **WNCT - 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.

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

PURCHASE ORDER DATE	DATE REQUIRED	JOB NUMBER	FOA	BUY	NO	NO OF SAMPLES REQUIRED	ACCOUNT
7-5-84	7-5-84						HPS
QUANTITY ORDERED	QUANTITY REQUIRED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL
		To purchase television time for Helms for Senate Committee. Ads to be announced Ads to run Mon. July 16 - Sun. Aug. 12, 1984 M-F 9-10a CBS Morning News M,W,F 12:30-4p PM Rotation M-F 7-8a Carolina Today M-F 6-7a Carolina Today M,T,Th,F 10-12n CBS AM Rotation					
				5 @	35.	175.00	
				3 @	125.	375.00	
				5 @	50	250.00	
				5 @	45.	225.00	
				4 @	40.	160.00	
							1185.00
							177.75
							1007.25
		This is a weekly schedule to be July 16- July 23- July 30- Aug. 6-1.					
		Weekly payment of \$ 1007.25 Advertising/Dawson - HPS - Tele CHECK ATTACHED: RECEIPT & AFFIDAVIT					

35030504347

7/20 - 7/22
 35.00 ✓
 125.00 ✓
 50.00 ✓
 45.00 ✓
 40.00 ✓

 295.00

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

RPH
 PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

P.O. BOX 19907 • RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER	
NO. 10940	2905
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

VENDOR

WITH - TV
Highway 17 South
Washington, N.C. 27889

SHIP TO

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 TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

PURCHASE ORDER DATE		DATE REQUIRED		JOB NUMBER		P.O.#		PRICE REQUIRED		ACCOUNT	
7-5-84		7-5-84								HPS	
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW								UNIT PRICE	TOTAL
To purchase :30 television time for Helms for Senate Committee.											
Ads to be announced											
Ads to run Mon. July 16 - August 12, 1984											
		M-F	12:30-4p	Afternoon Rotation	5 @	35.					175.00
		M,W,F	12-12:30p	Eyewitness News	3 @	30.					90.00
		M-F	6-7a	Almanac	5 @	25.					125.00
		M-F	9-12n	Morning Rotation	5 @	30.					150.00
		T,Th	5-6p	Little House	2 @	50.					100.00
										gross	640.00
										less 15%	96.00
										net	\$544.00
		This is a w		35.00 ✓			repeated				
				30.00 ✓							
				25.00 ✓							
				30.00 ✓							
				120.00							
		Weekly pay									
		Advertisin									
		<u>CHECK ATT!</u>									

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

Handwritten initials and signature
PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

P.O. BOX 19887 - RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER	
NO. 10942	2905
THE NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE	

VENDOR
 WCTI - TV
 Park Ave
 Glenburnie Gardens
 New Bern, N.C. 28560
 Attention: Archie Russell

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

PURCHASE ORDER DATE	DATE ORDERED	JOB NUMBER	FOA	PRICE REQUIRED	NO. OF SAMPLES REQUIRED	ACCOUNT
7-5-84	7-5-84			Y		NPS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW			UNIT PRICE	TOTAL
		To purchase :30 television time for Helms for Senate Committee. Ads to be announced Ads to run Mon. July 16 - Sun. Aug. 12, 1984 M-F 11-4p ABC Rotation T,Th 7-7:30p Wheel of Fortune M,W,F 5:30-6p People's Court			5 @ 40. 2 @ 135. 3 @ 100.	200.00 160.00 270.00 300.00 770.00 730.00 115.50 109.50
			S-S 40 80	M-Th 160 370 200	gross less 15% net	\$620.50 654.50
		This is a $\frac{1}{30}$ - $\frac{7}{21}$ e repeated			-22 -29 =Aug. 5 12	
			40.00 100.00 140.00			
		Weekly pay Advertisin CHECK ATTA				
		Television Purchase AVIT REQUESTED				

35030504349

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

PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO.	10456
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

2965

VENDOR **WVAY-TV**
 615 N. Front St.
 P.O. BOX 2068
 Wilmington, NC 28401

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

R 5 0 3 0 5 0 4 3 5 1

PURCHASE ORDER DATE		DATE REQUIRED		JOB NUMBER		FOA		PROOF REQUIRED		ACCOUNT	
7/5/84								YES	NO	NO OF SAMPLES REQUIRED	HFS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW								UNIT PRICE	TOTAL
		To purchase 30 sec. TV Time for HFS Committee. ADDS TO HIM July 16-22 M,F 7-9a Good Morning America 2 @ 30 60.00 M,T,TH,F 12-4p Afternoon Rot. 4 @ 50 280000 Sun 5-6p Star Search 1 @ 60 60.00 Sat 7-8p Hoe How 1 @ 90 90.00 Wheel of 7:3-8p Wheel of Fortune 1 @ 105 105.00									
										gross	815.00
										less 15%	77.25
										net	437.75

7/20 - 7/22
Pay #183 instead.
 30. -
 50. -
 60. - ✓
 90. - ✓

 230.00

Advertising / Dawson- H

Check attached: RECEIPT & AFFIDAVIT REQUESTED

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

APP

PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

P.O. BOX 19907 • RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER	
NO.	11155-1895
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE	

VENDOR

WLOS - TV
288 Macon Ave.
Asheville, N.C. 28802

SHIP TO

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.

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

PURCHASE ORDER DATE	DATE REQUIRED	ISS NUMBER	P.O.#	PRICE REQUIRED		NO. OF SAMPLES REQUIRED	ACCOUNT																								
7-18-84	7-18-84			Y	N		HFS																								
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL																								
		<p>To purchase :30 television time for Helms for Senate Committee/Americans for Reagan.</p> <p>AFR-1 :Defending Reagan"</p> <p>Ads to run Fri. July 20 - Sun. July 22, 1984</p> <table border="0"> <tr> <td>Sun.</td> <td>6 & 11</td> <td>News Combo</td> <td>600.00</td> </tr> <tr> <td>Sat.</td> <td>6:30-7p</td> <td>News</td> <td>175.00</td> </tr> <tr> <td>Sat.</td> <td>2:30-4p</td> <td>Salute to American's Gold Medal Champions</td> <td>275.00</td> </tr> <tr> <td>Fri.</td> <td>12-12:30a</td> <td>Niteline</td> <td>30.00</td> </tr> <tr> <td>Sun.</td> <td>1-2p</td> <td>David Brinkley</td> <td>100.00</td> </tr> <tr> <td>Sat.</td> <td>4-5p</td> <td>Country Rotation</td> <td>100.00</td> </tr> </table> <p style="text-align: right;">gross 1280.00</p> <p style="text-align: right;">less 15% 192.00</p> <p style="text-align: right;">net \$1088.00</p>				Sun.	6 & 11	News Combo	600.00	Sat.	6:30-7p	News	175.00	Sat.	2:30-4p	Salute to American's Gold Medal Champions	275.00	Fri.	12-12:30a	Niteline	30.00	Sun.	1-2p	David Brinkley	100.00	Sat.	4-5p	Country Rotation	100.00		
Sun.	6 & 11	News Combo	600.00																												
Sat.	6:30-7p	News	175.00																												
Sat.	2:30-4p	Salute to American's Gold Medal Champions	275.00																												
Fri.	12-12:30a	Niteline	30.00																												
Sun.	1-2p	David Brinkley	100.00																												
Sat.	4-5p	Country Rotation	100.00																												
<p>Advertising/Hawley - HFS/AFR - TV Purchase</p> <p><u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u></p>																															

35030504352

*Entered
Revised*

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

PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO. 11157	1895
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE	

VENDOR

WSPA - TV
I-88 & I-25
Spartanburg, S.C. 29304

SHIP TO

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.

ORDER DATE	DATE RECEIVED	JOB NUMBER	P.O. NO.	YES	NO	NO OF SAMPLES REQUIRED	ACCOUNT	
7-18-84	7-18-84						HFS	
PLEASE SUPPLY ITEMS LISTED BELOW							UNIT PRICE	TOTAL
To purchase :30 television time for Helms for Senate Committee/Americans for Reagan AFR-1 "Defending Reagan" Ads to run Fri. July 20 - Sun. July 22, 1984 Sat. 7-8p Hee Haw							600.00	✓
							less 15%	90.00
							net	\$510.00
Advertising/Hawley - HFS/AFR - TV Purchase								
<u>CHECK ATTACHED; RECEIPT & AFFIDAVIT REQUESTED</u>								

35030504353

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

PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO. 11156	1895
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

VENDOR
WYFF - TV
 505 Rutherford St.
 Greenville, S.C. 29609
 Attention: Debbie Kay

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

PLACEMENT ORDER DATE	DATE RECEIVED	AD NUMBER	FOA	PRICE REQUIRED		NO. OF SAMPLES REQUIRED	ACCOUNT
7-18-84	7-18-84			Y	N		HFS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL
.....	To purchase :30 television time for Helms for Senate Committee. AFR-1 "Defending Reagan" Ads to run Fri. July 20 - Sun. July 22, 1984 Sat. 5-6p Star Search Sun. 4-6p Sportsworld Sat. 1-7p Baseball				150.00 ✓ 225.00 ✓ 350.00 ✓	
						gross	725.00
						less 15%	108.75
						net	\$616.25
Advertising/Bawley - HFS/AFR - TV Purchase <u>CHECK ATTACHED; RECEIPT & AFFIDAVIT REQUESTED</u>							

25030604354

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

[Signature]
 PURCHASING AGENT

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO. 11158	1985
THE NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

VENDOR

WHNS - TV
 Interstate Court at
 Pilham Rd.
 Greenville, S.C. 29607
 Attention: Rick Lowe

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

PURCHASE ORDER DATE	DATE REQUIRED	JOB NUMBER	JOB	PROOF REQUIRED		NO. OF SAMPLES REQUIRED	ACCOUNT
7-18-84	7-18-84			Y	N		HFS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL
35030604355		To purchase :30 television time for Helms for Senate Committee/Americans for Reagan. AFR-1 "Defending Reagan" Ads to run Fri. July 20 - Sun. July 22, 1984 Sun. 4-6p Movie					250.00
						less 150	37.50
						net	\$212.50
Advertising/Hawley/HFS/AFR - TV Purchase <u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>							

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

[Signature]
 PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO. 11163	1895
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE	

VENDOR **WBTV**
 1 Julian Price Place
 Charlotte, N.C. 28208

SHIP TO

Attention: Dan DuVall

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 DATE	DATE REQUIRED	JOB NUMBER	P.O.#	PROOF REQUIRED		NO. OF SAMPLES REQUIRED	ACCOUNT
7-18-84	7-18-84			YES	NO		HFS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL
		To purchase :30 television time for Helms for Senate Committee/Americans for Reagan AFR-1 "Defending Reagan" Ads to run Fri. July 20 - Sun. July 22, 1984 Sat. 6-7p News Adj. 700.00 F,Sat 11-11:30p 1:30-News Adj 1600.00 Sun 11-11:30p News Adj. 700.00 Sun. 9-10:30 CBS Sun. Mornign 225.00				2 @800	3225.00 ✓
		gross					3225.00
		less 15%					483.75
		net					\$2741.25
Advertising/Miller - HFS/AFR - TV Purchase <u>CHECK ATTACHED! RECEIPT & AFFIDAVIT REQUESTED</u>							

35030604356

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

PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO.	11162
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

1895

VENDOR
WSOC - TV
 1901 N. Tryon Rd.
 Charlotte, NC. 28234

SHIP
 TO

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 PURCHASE ORDER.

MAIL INVOICE IN TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

PURCHASE ORDER DATE	DATE RECEIVED	JOB NUMBER	F.O.B.	PROOF REQUIRED			NO. OF SAMPLES REQUIRED	ACCOUNT
xxxx 7-18-84	7-18-84							HFS
QUANTITY ORDERED	QUANTITY RECEIVED	PLEASE SUPPLY ITEMS LISTED BELOW					UNIT PRICE	TOTAL
		To purchase :30 television time for Helms for Senate Committee/Americans for Reagan. AFR-1 "Defending Reagan" Ads to run Fri. July 20 - Sun. July 22, 1984 Sat. 4-5p Star Search 225.00 ✓ Sat. 1:30-2:30a Star Search Encore 25.00 ✓ Sun. 10-1p British Open 700.00 ✓ gross 9950.00 ✓ less 15% 142.50 net 8807.50						
		Advertising/Miller - HFS/AFR - TV Purchase <u>CHECK ATTACHED! RECEIPT & AFFIDAVIT REQUESTED</u>						

95030504337

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

[Signature]
 PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

P.O. BOX 10887 • RALEIGH, NORTH CAROLINA 27610

PURCHASE ORDER	
NO.	11164
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

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

PURCHASE ORDER DATE	DATE RECEIVED	JOB NUMBER	P.O.#	PROOF REQUIRED		NO OF SAMPLES REQUIRED	ACCOUNT																														
7-18-84	7-18-84			Y	N		HFS																														
PLEASE SUPPLY ITEMS LISTED BELOW						UNIT PRICE	TOTAL																														
<p>To purchase :30 television time for Helms for Senate Committee/Americans for Reagan</p> <p>APR-1 "Defending Reagan"</p> <p>Ads to run Fri Jul 20 - Sun. July 22, 1984</p> <table> <tr> <td>Sat.</td> <td>12-5p</td> <td>Sat. Movie Rotation</td> <td>2 @ 90.</td> <td>180.00</td> <td></td> </tr> <tr> <td>Sun.</td> <td>2-5p</td> <td>Sun. Cinema</td> <td>3 @ 100</td> <td>300.00</td> <td></td> </tr> <tr> <td colspan="4"></td> <td>gross</td> <td>480.00</td> </tr> <tr> <td colspan="4"></td> <td>less 15%</td> <td>72.00</td> </tr> <tr> <td colspan="4"></td> <td>net</td> <td>\$408.00</td> </tr> </table>						Sat.	12-5p	Sat. Movie Rotation	2 @ 90.	180.00		Sun.	2-5p	Sun. Cinema	3 @ 100	300.00						gross	480.00					less 15%	72.00					net	\$408.00		
Sat.	12-5p	Sat. Movie Rotation	2 @ 90.	180.00																																	
Sun.	2-5p	Sun. Cinema	3 @ 100	300.00																																	
				gross	480.00																																
				less 15%	72.00																																
				net	\$408.00																																
Advertising/Miller - HFS/APR - TV Purchase																																					
<u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>																																					

Handwritten: Total \$400

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

Handwritten signature: RPH

PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

P.O. BOX 18807 • RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER	
NO. 11161	1895
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

VENDOR **WPMY - TV**
 Phillips Ave & White St.
 Greensboro, N.C. 27420

SHIP TO

Attention: Jeff Sales

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 DATE	DATE REQUIRED	JOB NUMBER	T.O.#	PROOF REQUIRED		ACCOUNT
7-18-84	7-18-84			Y	N	HFS

QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
------------------	------------------	----------------------------------	------------	-------

95030504359

To purchase :30 television time for Helms for Senate/Americans for Reagan.

AFR-1 "Defending Reagan"

Ads to run Fri. July 20 - Sun. July 22, 1984

S/Sun	12-6p	Movie	75.00
Fri.	7-7:30	CBS Evening News	440.00
Sat.	4-6p	Olympic	450.00
Sun.	6-6:30	Early News	525.00

gross 1490.00 ✓

less 15% 223.50

net \$1266.50

Advertising/Dawson - HFS/AFR - TV Purchase

CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED

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

PPH

PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

NO. 11160	1895
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

VENDOR **WXII - TV**
 700 Coliseum Dr.
 Winston Salem, N.C. 27101

SHIP TO

Robbie's file

Attention: Zack 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 TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

PURCHASE ORDER DATE	DATE ORDERED	JOB NUMBER	F.O.B.	PROOF REQUIRED		NO. OF SAMPLES REQUIRED	ACCOUNT
7-18-84	7-18-84			YES	NO		HFS
PLEASE SUPPLY ITEMS LISTED BELOW						UNIT PRICE	TOTAL
To purchase :30 television time for Helms for Senate Committee/Americans for Reagan AFR-1 "Defending Reagan" Ads to run Fri. July 20 - Sun. July 22, 1984							
Sat. 1-6p Major League Baseball Sat. 11-11:30p Late News Sun. 12:30-1p Meet the Press Sun. 2-6p Michigan Sun. 6-6:30 Early News Sun. 11-11:30p Late News						2 @	300.00 225.00 100.00 200.00 150.00 225.00
						gross	1500.00
						less 15%	225.00
						net	\$1275.00
Advertising/Dawson - HFS/AFR - Television Purchase <u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>							

35030504350

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

RDH

PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

NO.	11165
THE NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

1895

VENDOR **WGHP - TV**
 2005 Francis St.
 High Point, N.C. 27261
 Attention: **Charlie Davis**

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

PURCHASE ORDER DATE	DATE REQUIRED	JOB NUMBER	F.O.B.	PROOF REQUIRED		NO. OF SAMPLES REQUIRED	ACCOUNT	
7-18-84	7-18-84			Y	N		HFS	
PLEASE SUPPLY ITEMS LISTED BELOW							UNIT PRICE	TOTAL
TO purchase :30 televisiontime for Helms for Senate Committee/Americans for Reagan AFR-1 "Defending Reagan" Ads to run Fri July 20 - Sun. July 22, 1984 Sun. 6-6:30p TV Eyewitness News Fri. 6-6:30p TV Eyewitness News Sat/Sun 12-2p British Open Sun. 4-6p Aspen Tennis							2 @ 325	200.00 425.00 650.00 350.00 <hr/> 1625.00 ✓ 1525.00 <hr/> 243.75 <hr/> \$1381.25
gross less 15% net								
Advertising/Miller - HFS/AFR - TV Purchase <u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>								

35030504361

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

APH

PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

P.O. BOX 19007 • RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER	
NO.	11153
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

1895

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

PURCHASE ORDER DATE		DATE REQUIRED		JOB NUMBER		FOA		PROOF REQUIRED		ACCOUNT			
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW										UNIT PRICE	TOTAL
7-18-84	7-18-84											HPS	
		To purchase :30 television time for Helms for Senate Committee/Americans for Reagan. AFR-1 "Defending Reagan" Ads to run Fri. July 20 - Sun. July 22, 1984 Sun. 1-5p Jesse Owens Story 2 @ 35. 70.00 ✓ less 15t 10.50 net \$59.50											
		Advertising/Hawkeye - HPS/AFR - Television Purchase <u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>											

35030504362

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

[Signature]
 PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER NO.	
NO.	11159
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

1895

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

SHIP TO

Attention: John Pearcy

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 DATE	DATE RECEIVED	JOB NUMBER	T.O.#	PRICE REQUIRED	NO. OF SAMPLES REQUIRED	ACCOUNT	
7-18-84	7-18-84			Y	NO	HFS	
QUANTITY ORDERED	QUANTITY RECEIVED	PLEASE SUPPLY ITEMS LISTED BELOW			UNIT PRICE	TOTAL	
		To purchase :30 television time for Helms for Senate Committee/Americans for Reagan. AFR-1 "Defending Reagan" Ads to Advarone Fri. July 20 - Sun. July 22, 1984 Sun. 11-11:30p News Sat. 7-8p See Saw Sun. 9-10:30 CBS Sunday Morning Sat. 1-3p Country Morning					
						650.00	
						400.00	
						250.00	
						140.00	
				gross		1440.00	
				less 15%		216.00	
				net		\$1224.00	
		Advertising/Hawley - HFS/APR TV Purchase					
		<u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>					

35030504363

missed

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

 PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

P.O. BOX 10007 • RALEIGH, NORTH CAROLINA 27610

NO.	11154
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

VENDOR

WLFL - TV
2410 Broad St.
Durham, N.C. 27704

SHIP TO

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 TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

PURCHASE ORDER DATE	DATE RECEIVED	JOB NUMBER	F.O.B.	PRICE REQUIRED		NO OF SAMPLES REQUIRED	ACCOUNT																																	
7-18-84	7-18-84			Y	N		HFS																																	
PLEASE SUPPLY ITEMS LISTED BELOW						UNIT PRICE	TOTAL																																	
<p>To purchase :30 television time for Helms for Senate Committee/Americans for Reagan.</p> <p>AFR-1 "Defending Reagan"</p> <p>Ads to run Fri. July 20 - Sun. July 22, 1984</p> <table border="0"> <tr> <td>Sat.</td> <td>1-2p</td> <td>Gunsmoke</td> <td></td> <td></td> <td>70.00</td> </tr> <tr> <td>Sun.</td> <td>5-7p</td> <td>Movie</td> <td></td> <td></td> <td>90.00</td> </tr> <tr> <td colspan="6" style="text-align: right;">gross</td> <td>160.00</td> </tr> <tr> <td colspan="6" style="text-align: right;">less 15%</td> <td>24.00</td> </tr> <tr> <td colspan="6" style="text-align: right;">net</td> <td>\$136.00</td> </tr> </table> <p>Advertising/Hawley - HFS/AFR - TV Purchase</p> <p><u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u></p>						Sat.	1-2p	Gunsmoke			70.00	Sun.	5-7p	Movie			90.00	gross						160.00	less 15%						24.00	net						\$136.00		
Sat.	1-2p	Gunsmoke			70.00																																			
Sun.	5-7p	Movie			90.00																																			
gross						160.00																																		
less 15%						24.00																																		
net						\$136.00																																		

95030504364

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

[Signature]
PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

P.O. BOX 18897 • RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER	
NO. -- 11142	1895
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

VENDOR

WECT - 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

MAIL INVOICE IN TRIPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

PURCHASE ORDER DATE	DATE RECEIVED	QUANTITY	FOA	PRICE RECEIVED	ACCOUNT	
7-18-84	7-18-84			Y N	NO. OF SAMPLES REQUIRED HFS	
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW			UNIT PRICE	TOTAL
		<p>To purchase :30 television time for Helms for Senate/Americans for Reagan.</p> <p>AFR-1 "Defending Reagan"</p> <p>Ads to run Fri. July 20 - Sun. July 22, 1984</p> <p>Sat. 4-6p Basketball (Olympic/Pro) 275.00</p> <p>Sun. 9-10:30a CBS Sunday Morning 100.00</p> <p>gross 375.00</p> <p>less 15% 56.25</p> <p>net \$318.75</p>				
Advertising/Dawson - HFS/AFR - Television Purchase						
<u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>						

35030504365

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

RPH
PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO. 11152	1895
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

VENDOR

WITS - TV
Highway 17 South
Washington, NC. 27889

SHIP TO

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

PURCHASE ORDER DATE	DATE RECEIVED	JOB NUMBER	F.C.B.	PROOF REQUIRED		NO. OF SAMPLES REQUIRED	ACCOUNT
7-18-84	7-18-84			Y	N		HPS
QUANTITY ORDERED	QUANTITY DELIVERED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL
95030504366		No purchase :30 television time for Helms for Senate Committee/Americans for Reagan. AFR-1 "Defending Reagan" Ads to run Fri. July 20 - Sun. July 22, 1988 Sun. 6:30p News 140.00 Sun. 4p-cc Baseball 125.00 Sat. 7-8p Bee Haw 130.00					
		gross					395.00
		Less 15%					59.25
		net					\$333.75
Advertising/Dawson - HPS/AFR - Television Purchase							
<u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>							
							S/B \$335.75

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

RPY

PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO. 11144	1895
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

VENDOR

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

SHIP TO

Attention: Archie Russell

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.

CLIENT (BILL TO) Jefferson Marketing, Inc.
--

PURCHASE ORDER DATE		DATE REQUIRED		JOB NUMBER		T.O.#		PROOF REQUIRED		ACCOUNT	
7-18-84		7-18-84						YES NO		NO. OF SAMPLES REQUIRED HPS	
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW								UNIT PRICE	TOTAL
		To purchase :30 television time for Helms for Senate/Americans for Reagan. AFR-1 "Defending Reagan" Ads to run Fri. July 20 - Sun. July 22, 1984 Fri. 6-7p News Sat. 11-11:30 Late News Sat. 5-6:30p Wide World of Sports gross 335.00 ✓ less 15¢ 50.25 net 884.75 Advertising/Dawson - HPS/AFR - TV Purchase <u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>									

850504367

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

RPH
PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO.	11143
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

1985

VENDOR

WECT - TV
322 shipyard Blvd.
Wilmington, N.C. 28403

SHIP TO

Attention: Ann 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 TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

PURCHASE ORDER DATE	DATE REQUIRED	FOR NAME	FOR	PRICE REQUIRED		NO. OF SAMPLES REQUIRED	ACCOUNT
7-18-84	7-18-84			Y	N		HFS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL
3		To purchase :30 television time for Helms for Senate Committee/Americans for Reagan.					
5		APR - 1 "Defending Reagan"					
4		Ads to run Fri. July 20 - Sun. July 22, 1984					
0		Sat.	11:30	News		125.00	
5		Sun.	12:30-1p	Meet the Press		60.00	
0		Sat.	1p-6p.	Double Header Baseball		80.00	
3		Sun.	6:30	News		250.00	
0				gross		515.00	
3				less 15%		77.25	
0				net		\$437.75	
		Advertising/Bawson- HFS/APR - TV Purchase					
		<u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>					

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

APH
PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER:	
NO. 11145	1984
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

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

SHIP TO

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.

PLACEMENT ORDER DATE	DATE REQUIRED	JOB NUMBER	FOA	PROOF REQUIRED		NO OF SAMPLES REQUIRED	ACCOUNT
7-18-84	7-18-84			Y	N		HFS
QUANTITY ORDERED	QUANTITY REQUIRED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL
		To purchase :30 television time for Helms for Senate Committee/Americans for Reagan Senate Committee/Americans for Reagan "AFR-1 "Defending Reagan" AFR to run Fri. July 20 - Sun. July 22, 1984 Sun. 606:30 30News Fri. 5-6:30p News Sat. 12-2p British Open Golf Sat. 4:30-5p Sports Beat Sun. 11-1p British Open Sun. 2:30-3p Olympic Dreams gross 540.00 ✓ less 15% 81.00 net \$459.00					
Advertising/Dawson - HFS/AFR - TV Purchase <u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>							

95030504369

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

RPH

PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

BOX 19807 • RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER	
NO. 1114	045
INVOICE, PACKAGES AND DELIVERY	

VENDOR
WLOS - TV
 288 Macon Ave.
 Asheville, N.C. 28802

SHIP TO

*Patricia
 J. Lee*

Attention: Ken Galloway

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 TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

DATE	DATE	Y	M	D	NO. OF SAMPLES REQUIRED	RPS
7-16-84	7-16-84					
<p>To purchase television time for Helms for Senate Committee.</p> <p>APR-1 "Defending Reagan" :30</p> <p>Ads to run Mon. July 23 - Fri. July 27, 1984</p> <p>2 Mon 7-9a Good Morning America 6 @ 100. 600.00 ✓</p> <p>1T-F 12-12:30a Nightline 5 @ 30. 150.00 ✓</p> <p>M-F 5 & 11 News Combo 5 @ 60. 300.00 ✓</p> <p>gross 3750.00</p> <p>less 15% 562.50</p> <p>net \$3187.50</p> <p>Contract # 281531</p> <p>Advertising/Hawley - RPS/APR - TV Purchase</p> <p><u>CHECK ATTACHED; RECEIPT & AFFIDAVIT REQUESTED</u></p>						

85050501370

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

APH

 PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

BOX 19807 • RALEIGH, NORTH CAROLINA 27618

NO. 11176 3845

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 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 TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

DATE ORDERED	DATE RECEIVED	ORDER NUMBER	QUANTITY	UNIT PRICE	TOTAL	NO. OF SAMPLES REQUIRED
7-16-84	7-16-84					HFS
<p>To purchase television time for Helms for Senate Committee.</p> <p>APR-1 "Defending Reagan" :30</p> <p>Ads to run Mon. July 23 - Fri. July 27, 1984</p> <p>12a Mond 7-9a Today Show 1 T-F</p> <p style="text-align: right;">6 @ 120. 720.00 ✓</p> <p style="text-align: right;">less 150</p> <p style="text-align: right;">net 108.00</p> <p style="text-align: right;">\$612.00</p> <p>Contract # 410270</p> <p>Advertising/Hawley - HFS/APR - TV Purchase</p> <p><u>CHECK ATTACHED; RECEIPT & AFFIDAVIT REQUESTED</u></p>						

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

[Signature]
PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

P.O. BOX 1007 • RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER
 NO. 11104-045

VENDOR

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

SHIP
 TO

Attention: Dan Duvall

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 TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

7-16-84		7-16-84		NO. OF SAMPLES REQUIRED		HFS	
To purchase television time for Helms for Senate Committee. AFR-1 "Defending Reagan" :30 Ads to run Mon. July 23 - Fri. July 27, 1984				5 @ 125. 625.00 2 @ 700. 1400.00 2 @ 700. 1400.00			
M-F 7-9a CBS Morning News ThyF 8p Evening News ThyF 11p Late News							
				gross		3425.00 ✓	
				less 15%		513.75	
				net		\$2911.25	
Advertising/ - HFS/AFR - TV Purchase/Miller							
<u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>							

35030501372

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

PURCHASING AGENT

VENDOR

RPB
P. Jones

JEFFERSON MARKETING, INC.

P.O. BOX 18807 • RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER	
NO.	11105

3045

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

SHIP
 TO

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 PURCHASE ORDER.

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

350303504373

DATE		TIME		PROGRAM	SPOTS	NO. OF SAMPLES REQUIRED	PRICE															
7-16-84	7-16-84																					
<p>To purchase television time for Helms for Senate Committee.</p> <p>APR-1 "Defending Reagan" :30</p> <p>Ads to run Mon. July 23 - Fri. July 27, 1984</p> <table border="0"> <tr> <td>M-F</td> <td>7-9a</td> <td>Good Morning America</td> <td>5 @ 200.</td> <td>1000.00</td> </tr> <tr> <td>Th,F</td> <td>5:55p</td> <td>Nash/News Adj.</td> <td>2 @ 600.</td> <td>1200.00</td> </tr> <tr> <td>M-F</td> <td>11:30-12m</td> <td>Nightline</td> <td>5 @ 350.</td> <td>1750.00</td> </tr> </table> <p style="text-align: right;">gross 3950.00</p> <p style="text-align: right;">less 15% 592.50</p> <p style="text-align: right;">net \$3357.50</p>								M-F	7-9a	Good Morning America	5 @ 200.	1000.00	Th,F	5:55p	Nash/News Adj.	2 @ 600.	1200.00	M-F	11:30-12m	Nightline	5 @ 350.	1750.00
M-F	7-9a	Good Morning America	5 @ 200.	1000.00																		
Th,F	5:55p	Nash/News Adj.	2 @ 600.	1200.00																		
M-F	11:30-12m	Nightline	5 @ 350.	1750.00																		
<p>Advertising/Miller - HPS/APR - TV Purchase</p> <p><u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u></p>																						

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

PURCHASING AGENT

VENDOR

ROH
Jones

JEFFERSON MARKETING, INC.

P.O. BOX 1007 - RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER	
NO.	11186
3045	

VENDOR

WPCQ - TV
8036 Hood Rd.
Charlotte, N.C. 28216

SHIP TO

Attention: Frank Makk

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 TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

CLIENT (BILL TO)
Jefferson Marketing, Inc.

START DATE	END DATE	PRODUCT	NO. OF SAMPLES REQUIRED	PRICE
7-16-84	7-16-84			
		To purchase television time for Helms for Senate Committee.		
		APR-1 "Defending Reagan" :30		
		Ads to run Mon. July 23 - Fri. July 27, 1984		
		M-F 7-9a Today Show	5 @ 45.	225.00 ✓
		less 15¢		33.75
		net		\$191.25
		Advertising/Miller - HPS/APR - TV Purchase		
		<u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>		

350305043374

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

APB
[Signature]

PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

NO. 11109	3045
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND DELIVERIES	
FOR ORDER	

VENDOR

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

SHIP TO

Attention: Jeff Sales

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	DATE	QTY	UNIT	PRICE	NO. OF SAMPLES REQUIRED	TOTAL																																			
7-16-84	7-16-84	-				NFS																																			
<p>To purchase television time for Helms for Senate Committee.</p> <p>AFR-1 "Defending Reagan" :30</p> <p>Ads to run Mon. July 23 - Fri. July 27, 1984</p> <table border="0"> <tr> <td>M-F</td> <td>7-9a</td> <td>Good Morning Show</td> <td>5 @ 100.</td> <td>500.00</td> <td></td> </tr> <tr> <td>Th,F</td> <td>6p</td> <td>News</td> <td>2 @ 525.</td> <td>1050.00</td> <td></td> </tr> <tr> <td>Th,F</td> <td>11p</td> <td>News</td> <td>2 @ 1100.</td> <td>2200.00</td> <td></td> </tr> <tr> <td colspan="4"></td> <td>gross</td> <td>3750.00 ✓</td> </tr> <tr> <td colspan="4"></td> <td>less 15%</td> <td>562.50</td> </tr> <tr> <td colspan="4"></td> <td>net</td> <td>\$3187.50</td> </tr> </table>						M-F	7-9a	Good Morning Show	5 @ 100.	500.00		Th,F	6p	News	2 @ 525.	1050.00		Th,F	11p	News	2 @ 1100.	2200.00						gross	3750.00 ✓					less 15%	562.50					net	\$3187.50
M-F	7-9a	Good Morning Show	5 @ 100.	500.00																																					
Th,F	6p	News	2 @ 525.	1050.00																																					
Th,F	11p	News	2 @ 1100.	2200.00																																					
				gross	3750.00 ✓																																				
				less 15%	562.50																																				
				net	\$3187.50																																				
<p>Advertising/Dawson - NFS/AFR - TV Purchase</p> <p><u>CHECK ATTACHED; RECEIPT & AFFIDAVIT REQUESTED</u></p>																																									

35030504373

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

PURCHASING AGENT

VENDOR

RAB
7/27/84

JEFFERSON MARKETING, INC.

P.O. BOX 18607 • RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER		0045
NO.	11108	
THIS ORDER IS NOT VALID UNLESS IT IS ACCOMPANIED BY THE ORIGINAL INVOICE AND CONFIRMATION.		

VENDOR

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

SHIP
TO

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 TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

DATE	DATE	NO.	NO.	NO. OF SAMPLES REQUIRED	AMOUNT																																		
7-16-84	7-16-84																																						
PLEASE SUPPLY ITEMS LISTED BELOW																																							
<p>To purchase television time for Helms for Senate Committee.</p> <p>AFR-1 "Defending Reagan" :30</p> <p>Ads to run Mon. July 23 - Fri. July 27, 1984</p> <table border="0"> <tr> <td>M-F</td> <td>7-9a</td> <td>Today Show</td> <td>5 @ 50.</td> <td>250.00 ✓</td> </tr> <tr> <td>Th,F</td> <td>6p</td> <td>News</td> <td>2 @ 350.</td> <td>700.00 ✓</td> </tr> <tr> <td>Ty,F</td> <td>11p</td> <td>News</td> <td>2 @ 225.</td> <td>450.00 ✓</td> </tr> <tr> <td colspan="4"></td> <td>1400</td> </tr> <tr> <td colspan="4"></td> <td>2000000 ✓</td> </tr> <tr> <td colspan="4"></td> <td>210.00-</td> </tr> <tr> <td colspan="4"></td> <td>\$1190.00</td> </tr> </table>					M-F	7-9a	Today Show	5 @ 50.	250.00 ✓	Th,F	6p	News	2 @ 350.	700.00 ✓	Ty,F	11p	News	2 @ 225.	450.00 ✓					1400					2000000 ✓					210.00-					\$1190.00
M-F	7-9a	Today Show	5 @ 50.	250.00 ✓																																			
Th,F	6p	News	2 @ 350.	700.00 ✓																																			
Ty,F	11p	News	2 @ 225.	450.00 ✓																																			
				1400																																			
				2000000 ✓																																			
				210.00-																																			
				\$1190.00																																			
<p>Advertising/Dawson - HFS/AFR - TV Purchase</p> <p><u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u></p>																																							

35030604375

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

APB
2-1-84

PURCHASING AGENT

JEFFERSON MARKETING, INC.

P.O. BOX 38807 • RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER	
NO.	11107-3845
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

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

Attention: Charlie Davis

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.

PURCHASE ORDER DATE	DATE REQUIRED	JOB NUMBER	F.O.B.	CREDIT REQUIRED		NO OF SAMPLES REQUIRED	ACCOUNT																								
7-16-84	7-16-84			YES	NO		HFS																								
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL																								
		<p>To purchase television time for Helms for Senate Committee.</p> <p>AFR-1 "Defending Reagan" :30</p> <p>Ads to run Mon. July 23 - Fri. July 27, 1984</p> <table border="0"> <tr> <td>M-F</td> <td>7-9a</td> <td>Good Morning America</td> <td>5 @</td> <td>75.</td> <td>375.00</td> </tr> <tr> <td>M-F</td> <td>11:30-12M</td> <td>Nightline</td> <td>5 @</td> <td>100.</td> <td>500.00</td> </tr> <tr> <td>Th,F</td> <td>6p</td> <td>News</td> <td>2 @</td> <td>425.</td> <td>850.00</td> </tr> <tr> <td>Th,F</td> <td>7-8p 7-8p</td> <td>xxxx Rotator</td> <td>2 @</td> <td>225.</td> <td>450.00</td> </tr> </table> <p style="text-align: right;">gross 2175.00 ✓</p> <p style="text-align: right;">less 15%</p> <p style="text-align: right;">net \$1848.75</p>				M-F	7-9a	Good Morning America	5 @	75.	375.00	M-F	11:30-12M	Nightline	5 @	100.	500.00	Th,F	6p	News	2 @	425.	850.00	Th,F	7-8p 7-8p	xxxx Rotator	2 @	225.	450.00		
M-F	7-9a	Good Morning America	5 @	75.	375.00																										
M-F	11:30-12M	Nightline	5 @	100.	500.00																										
Th,F	6p	News	2 @	425.	850.00																										
Th,F	7-8p 7-8p	xxxx Rotator	2 @	225.	450.00																										
<p>Advertising/Miller - HFS/AFR - TV Purchase</p> <p><u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u></p>																															

85030504377

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

RPD

PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO. 11110	3045
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

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

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 DATE	DATE REQUIRED	JOB NUMBER	FAA	PRICE REQUIRED	ACCOUNT	
7-16-84	7-16-84			YES NO	HPS	
QUANTITY ORDERED	QUANTITY ORDERED	PLEASE SPECIFY ITEMS LISTED BELOW			UNIT PRICE	EXTENDED PRICE
		To purchase television time for Helms for Senate Committee. AFR-1 "Defending Reagan" :30 Ads to run Mon. July 23 - Fri. July 27, 1984 M-F 7-9a Good Morning America			5 @ 225.	1125.00
					less 15%	168.75
					net	\$ 956.25
Advertising/Hawley - HPS/AFR - TV Purchase <u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>						

85030504378

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

R/H

 PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO.	11112
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE	

3045

VENDOR

WPTF - TV
 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.

PURCHASE ORDER DATE	DATE REQUIRED	JOB NUMBER	FOA	PROBE REQUIRED		NO OF SAMPLES REQUIRED	ACCOUNT
7-16-84	7-6-84			Y	N		HFS

QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
------------------	------------------	----------------------------------	------------	-------

R 5 0 3 0 5 0 4 3 7 9

To purchase television time for Helms for Senate Committee.

APR-1 "Defending Reagan" :30

Ads to run Mon. July 23 - Fri. July 27, 1984

M-F 7-9a TodayShow

5 @ 15. 75.00 ✓

less 15%

11.25

net

\$63.75

Advertising/Hawley - HFS/APR - TV Purchase

CHECK ATTACHED; RECEIPT & AFFIDAVIT REQUESTED

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

[Signature]
 PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.
P.O. BOX 19807 • RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER	
NO. 11111	3045
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE	

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

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 TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

PURCHASE ORDER DATE	DATE REQUIRED	JOB NUMBER	PRICE REQUIRED	ACCOUNT																				
7-16-84	7-13-84			HFS																				
QUANTITY ORDERED	QUANTITY REQUIRED	PLEASE SUPPLY ITEMS LISTED BELOW		TOTAL																				
		<p>To purchase television time for Helms for Senate Committee.</p> <p>APR-1 "Defending Reagan" :30</p> <p>Ads to run Mon. July 23 - Fri. July 27, 1984</p> <table border="0"> <tr> <td>M-F</td> <td>7-9a</td> <td>CBS Morning News</td> <td>5 @ 50.</td> <td>250.00</td> </tr> <tr> <td>M,Tu</td> <td>12-12:30p</td> <td>News</td> <td>2 @ 240.</td> <td>480.00</td> </tr> <tr> <td>Th,W,F</td> <td>6-7p</td> <td>News</td> <td>3 @ 650.</td> <td>1950.00</td> </tr> <tr> <td>Th,F</td> <td>11-11:30p</td> <td>News</td> <td>2 @ 650.</td> <td>1300.00</td> </tr> </table>		M-F	7-9a	CBS Morning News	5 @ 50.	250.00	M,Tu	12-12:30p	News	2 @ 240.	480.00	Th,W,F	6-7p	News	3 @ 650.	1950.00	Th,F	11-11:30p	News	2 @ 650.	1300.00	
M-F	7-9a	CBS Morning News	5 @ 50.	250.00																				
M,Tu	12-12:30p	News	2 @ 240.	480.00																				
Th,W,F	6-7p	News	3 @ 650.	1950.00																				
Th,F	11-11:30p	News	2 @ 650.	1300.00																				
			gross	\$3980.00 ✓																				
			less 15%	5997000																				
			netnet	\$3383.00																				
<p>Advertising/Hawley - HFS/APR - TV Purchase</p> <p><u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u></p>																								

85030504380

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

[Signature]
PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO. 11099	3045
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE	

VENDOR **WNCT - TV**
 3221 Evans St.
 Greenville, N.C. 27834

Attention: Bob Peretik

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.

PURCHASE ORDER DATE	DATE REQUIRED	JOB NUMBER	F.O.B.	PROOF REQUIRED		NO. OF SAMPLES REQUIRED	ACCOUNT
7-16-84	7-16-84			Y	N		HPS

85030504381

QUANTITY ORDERED		QUANTITY SHIPPED		PLEASE SUPPLY ITEMS LISTED BELOW		UNIT PRICE	AMOUNT
To purchase television ads for Helms for Senate Committee.				AFR-1 "Defending Reagan"			
Ads to run Mon. July 23 - Fri. July 27, 1984							
M-F	8-9a		CBS Morning News	5 @	40.		200.00
Th,F	6-7p		Evening News	2 @	250.		500.00
Th,F	11:30p		Late News	2 @	160.		320.00
				gross			1020.00 ✓
				less 15%			153.00
				net			\$ 867.00
Advertising/Dawson/fl - HPS/AFR - TV Purchase <u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>							

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

RJA
 J. J. ...
 PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO. 11098	3045
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

VENDOR **WITN - TV**
 Highway 17 South
 Washington, N.C. 27889

SHIP TO

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.

PURCHASE ORDER DATE	DATE REQUIRED	JOB NUMBER	P.O.#	PROVIDE REQUIRED	NO. OF SAMPLES REQUIRED	ACCOUNT
7-16-84	7-16-84					HFS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW			UNIT PRICE	TOTAL
		To purchase television ads for Helms for Senate Committee. AFR-1 "Defending Reagan" Ads to run Mon. July 23 - Fri. July 27, 1984 M-F 7-9a Today Show Th-F 6-7p Evening News Th,F 11-11:30 Late News				
					5 @ 30.	150.00
					2 @ 140.	280.00
					2 @ 65.	130.00
					Gross	560.00
					Less 15%	84.00
					net	\$476.00
					Advertising/Dawson/fl - HFS/AFR - TV Purchase	
					<u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>	

35030604382

8/27/84

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

Frank Brady
 PURCHASING AGENT

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO. 11097	3045
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

VENDOR

WCTI - TV
 Park Ave
 Glen Burnie Gardens
 New Bern, N.C. 28560
 Attention: Archie Russell

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 TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

ORDER DATE	DATE REQUIRED	JOB NUMBER	F.O.B.	PROOF REQUIRED		NO OF SAMPLES REQUIRED	ACCOUNT
7-16-84	7-16-84			YES	NO		HFS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL
		To purchase 130 television time for Helms for Senate Committee. APR - 1 "Defending Reagan" Ads to run Mon. July 23 - Fri. July 27, 1984 M-F 7-9a Good Morning American 5 @ 35. 178.00 M-F 11:30-12:30a Nightline 5 @ 40. 200.00 Th,F 6-7a Evening News 2 @ 175. 350.00 Th,F 11-11:30 Late Night 2 @ 100. 200.00 gross 925.00 less 15% net \$ 786.25					
Advertising/Dawson/fl - HFS/APR - TV Purchase <u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>							

35030504383

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

RPH
 PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO.	11100
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

3045

VENDOR

WECT - TV
322 Shipyard Blvd
Wilmington, N.C. 28403

SHIP TO

Attention: **Ann 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 TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

ORDER DATE	DATE RECEIVED	JOB NUMBER	FOR	PROOF REQUIRED		NO. OF SAMPLES REQUIRED	ACCOUNT																																										
7-16-84	7-16-84			Y	N		HFS																																										
PLEASE SUPPLY ITEMS LISTED BELOW																																																	
<p>To purchase television ads for Helms for Senate Committee.</p> <p style="text-align: center;">APR-1 "Defending Reagan"</p> <p>Ads to run Mon. July 23 - Fri. July 27, 1984</p> <table border="0"> <tr> <td>M-F</td> <td>7-9a</td> <td>Today Show</td> <td>5 @ 45.</td> <td>225.00</td> <td></td> <td></td> </tr> <tr> <td>Th,F</td> <td>6-7p</td> <td>Evening News</td> <td>2 @ 250.</td> <td>500.00</td> <td></td> <td></td> </tr> <tr> <td>Th,F</td> <td>11-11:30p</td> <td>Late News</td> <td>2 @ 125.</td> <td>250.00</td> <td></td> <td></td> </tr> <tr> <td colspan="4"></td> <td>gross</td> <td></td> <td>975.00</td> </tr> <tr> <td colspan="4"></td> <td>less 15%</td> <td></td> <td>146.25</td> </tr> <tr> <td colspan="4"></td> <td>net</td> <td></td> <td>\$828.75</td> </tr> </table>							M-F	7-9a	Today Show	5 @ 45.	225.00			Th,F	6-7p	Evening News	2 @ 250.	500.00			Th,F	11-11:30p	Late News	2 @ 125.	250.00							gross		975.00					less 15%		146.25					net		\$828.75	
M-F	7-9a	Today Show	5 @ 45.	225.00																																													
Th,F	6-7p	Evening News	2 @ 250.	500.00																																													
Th,F	11-11:30p	Late News	2 @ 125.	250.00																																													
				gross		975.00																																											
				less 15%		146.25																																											
				net		\$828.75																																											
<p>Advertising/Dawson - HFS/APR - TV Purchase</p> <p><u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u></p>																																																	

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

RPH
PURCHASING AGENT

VENDOR

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO. 11103	3045
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

VENDOR

WVAY - TV
615 N. Front St.
Wilmington, N.C. 28401

SHIP TO

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

PURCHASE ORDER DATE	DATE REQUIRED	JOB NUMBER	J.O.B.	PROOF REQUIRED		NO OF SAMPLES REQUIRED	ACCOUNT																							
7-16-84	7-16-84			YES	NO		HFS																							
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL																							
		<p>To purchase television time for Helms for Senate Committee.</p> <p>AFR-1 "Defending Reagan" :30</p> <p>Ads to run Mon. July 23 - Fri. July 27, 1984</p> <p>McKxxxxxSemiM</p> <table border="0"> <tr> <td>M-F</td> <td>7-9a</td> <td>Good Morning America</td> <td>5 @</td> <td>30.</td> <td>150.00</td> </tr> <tr> <td>M-F</td> <td>11:30-12M</td> <td>Niteline</td> <td>5 @</td> <td>30.</td> <td>150.00</td> </tr> <tr> <td>Th,F</td> <td>6-7p</td> <td>Evening News</td> <td>8 @</td> <td>125.</td> <td>250.00</td> </tr> <tr> <td>Th,F</td> <td>11-11:30p</td> <td>Late News</td> <td>2 @</td> <td>90.</td> <td>180.00</td> </tr> </table> <p style="text-align: right;">gross 730.00 ✓</p> <p style="text-align: right;">less 15%</p> <p style="text-align: right;">net \$ 620.00</p>				M-F	7-9a	Good Morning America	5 @	30.	150.00	M-F	11:30-12M	Niteline	5 @	30.	150.00	Th,F	6-7p	Evening News	8 @	125.	250.00	Th,F	11-11:30p	Late News	2 @	90.	180.00	
M-F	7-9a	Good Morning America	5 @	30.	150.00																									
M-F	11:30-12M	Niteline	5 @	30.	150.00																									
Th,F	6-7p	Evening News	8 @	125.	250.00																									
Th,F	11-11:30p	Late News	2 @	90.	180.00																									
<p>Advertising/Dawson - HFS/AFR - TV Purchase</p> <p><u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u></p>																														

35030504385

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

RPH

PURCHASING AGENT

VENDOR

WLOS-TV 13

P.O. BOX 2150 • ASHEVILLE, N.C. 28802

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

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

WLOS DATE 07/29/84

CHAR	REPRESENTATIVE	LANE/CHAR	SALESMAN
JESSE HELMS	ADVERTISER SEN. 413	POLITICAL	PRODUCT

ORDER TYPE 2	AGENCY EST. NO. 523/574
INVOICE NO. 588-003945	P. # 2
SCHEDULE DATES 07/13/84-07/26/84	BROADCAST MONTH JULY, 1984
CONTRACT YEAR	
BILLING INSTRUCTIONS	

LINE#	TIME	DAYS	START	END	SPOTS	PROGRAM	RATE	TOTAL
2		W	759A	30		HFS-850-A 10596	10000	
		TH	721A	30		HFS-850-A 10596	10000	
		TH	752A	30		HFS-850-A 10596	10000	
A LINE# 3	1200N- 200P		7/21 SA	121P 30	1	AFR-1R	15000	15000
U LINE# 4	400P- 800P		7/22 SU	559P 30	1	AFR-1 11292	15000	15000

PAID

MONTHLY COST PER ORDER CONFIRMATION	230000	ACTUAL GROSS BILLING	230000	SUB-TOTALS	
WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG.		AGENCY COMMISSION	34500	TOTAL RECONCILING ITEMS	
		NET DUE	195500		

[Signature]
My Check # 54032
DATE RECEIVED 21, 1984

511 HIAH 395

8 8 2 7 0 4 0 8 0 5 8

WLOS-TV 13

P.O. BOX 2150 • ASHEVILLE, N.C. 28802

AGENCY JEFFERSON MARKETING
 BILLING 3825 BARRETT DRIVE
 ADDRESS RALEIGH, N.C. 27619

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

WLOS DATE 07/29/84

CHAR	REPRESENTATIVE	LANE/CHAR	SALESMAN
JESSE HELMS	ADVERTISER SEN. 413	POLITICAL	PRODUCT

ORDER TYPE 2	AGENCY EST. NO. 523/974
INVOICE NO. 588-005945	PAGE
SCHEDULE DATES 07/13/84-07/26/84	BROADCAST MONTH JULY, 1984
CONTRACT YEAR	
BILLING INSTRUCTIONS	

LINE#	TIME	SPOTS	DATE	DAY	TIME	SECS	PROGRAM	RATE	TOTAL	REMARKS
1	700A-900A	10000	7/13	F	719A	30	HFS-811	10000		
			7/13	F	853A	30	HFS-811	10000		
M-TH	700A-900A	10000	7/20	F	721A	30	AFR-1	10000		31-23
			7/20	F	811A	30	AFR-1	10000		36-23
			7/16	M	745A	30	HFS-850-A	10000		
			7/16	M	811A	30	HFS-850-A	10000		
			7/17	T	719A	30	HFS-850-A	10000		
			7/17	T	844A	30	HFS-850-A	10000		
			7/18	W	818A	30	HFS-850-A	10000		
			7/18	W	849A	30	HFS-850-A	10000		
			7/19	TH	711A	30	HFS-850-A	10000		
			7/19	TH	819A	30	HFS-850-A	10000		
			7/23	M	809A	30	HFS-850-A	10000		
			7/23	M	858A	30	HFS-850-A	10000		
			7/24	T	811A	30	HFS-850-A	10000		
			7/24	T	846A	30	HFS-850-A	10000		
			7/25	W	710A	30	HFS-850-A	10000		

MONTHLY COST PER ORDER CONFIRMATION	ACTUAL GROSS BILLING	SUB-TOTALS
WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG.	AGENCY COMMISSION	TOTAL RECONCILING ITEMS
	NET DUE	511 394

7 8 5 7 0 5 0 5 8

WLOS-TV 13

P.O. BOX 2150 • ASHEVILLE, N.C. 28802

AGENCY JEFFERSON MARKETING
 BILLING 3825 BARRETT DRIVE
 ADDRESS RALEIGH, N.C. 27619

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

WLOS DATE 07/29/84

CHAR REPRESENTATIVE	LANE/CHAR SALESMAN
JESSE HELMS/ SEN. 413	POLITICAL PRODUCT

ORDER TYPE 2	AGENCY EST. NO. 823/974
INVOICE NO. 588-005948	P. 2 BROADCAST MONTH JULY, 1984
SCHEDULE DATES 07/18/84-08/10/84	CONTRACT YEAR
BILLING INSTRUCTIONS	

LINE#	TIME	START	END	DAY	TIME	SEC	PRODUCT	RATE	DESCRIPTION	AMOUNT
5		7/26	TH	234P	30		HFS-850-A 10596	15000		
		7/27	F	332P	30		HFS-850-A 10596	15000		
6	1230P- 100P	7/22	SU	---	---	---	---	--N/C	PGM RESCHEDULED	3000
8	1200M-1230A	7/17	T	1231A	30		HFS-850-A 10596	3000	SPEC PROGRAMMING	
10	700P- 730P	7/19	TH	705P	30		HFS-850-A 10596	35000		
12		7/22	SU	318P	30		07/22 AFR-1 11292	3000	TIME 1230- 100P	3000

PAID

MONTHLY COST PER ORDER CONFIRMATION	271000	ACTUAL GROSS BILLING	271000	SUB-TOTALS	3000	3300
I WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE AS TAKEN FROM THE PROGRAM LOG.		AGENCY COMMISSION	40650	TOTAL RECONCILING ITEMS		
My Commission Expires February 21, 1985.		NET DUE	230350	553	597	

88270402058

WLOS-TV 13

P.O. BOX 2150 • ASHEVILLE, N.C. 28802

AGENCY JEFFERSON MARKETING
 BILLING 3825 BARRETT DRIVE
 ADDRESS RALEIGH, N.C. 27619

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

WLOS DATE 07/29 84

CHAR	REPRESENTATIVE	LANE/CHAR	SALESMAN
JESSE HELMS	ADVERTISER SEN. 413	POLITICAL	PRODUCT

ORDER TYPE 2	AGENCY EST. NO. 5237974
INVOICE NO. 586-003946	BROADCAST MONTH JULY, 1984
SCHEDULE DATES 07/16/84-08/10/84	CONTRACT YEAR
BILLING INSTRUCTIONS	

LINE#	DAYS	TIME	SPOTS	RATE	START DATE	END DATE	PRODUCT	AMOUNT	REMARKS	
LINE# 1	1-F	700A-900A	3	10000	7/16	M	720A 30	HFS-850-A 10596	10000	
					7/18	W	721A 30	HFS-850-A 10596	10000	
					7/20	F	849A 30	AFR-1	10000	250
LINE# 3	1-F	700A-900A	5	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 10596	10000	
					7/26	TH	845A 30	HFS-850-A 10596	10000	
					7/27	F	810A 30	HFS-850-A 10596	10000	
LINE# 3	1-F	1228P-400P	5	15000	7/16	M	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	
					7/20	F	136P 30	HFS-850-A 10596	15000	Mixed
					7/23	M	158P 30	HFS-850-A 10596	15000	
					7/24	T	1228P 30	HFS-850-A 10596	15000	
7/25	W	259P 30	HFS-850-A 10596	15000						

MONTHLY COST PER ORDER CONFIRMATION	ACTUAL GROSS BILLING	SUB-TOTALS
WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG.	AGENCY COMMISSION	TOTAL RECONCILING ITEMS
	NET DUE	553 396

HIAH

68840908098

WLOS-TV 13

P.O. BOX 2150 • ASHEVILLE, N.C. 28802

AGENCY JEFFERSON MARKETING
 BILLING 3625 BARRETT DRIVE
 ADDRESS RALEIGH, N.C. 27619

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

WLOS DATE 07/29/84

CHAR	REPRESENTATIVE	LANE/CHAR	SALESMAN
	ADVERTISER	REP. FOR	PRODUCT
	JESSE HELMS/ SEN.		SENATE
	413		

ORDER TYPE 2	AGENCY EST. NO. 923974
INVOICE NO. 588-003974	P. 92
SCHEDULE DATES 07/23/84-07/27/84	BROADCAST MONTH JULY, 1984
CONTRACT YEAR	
BILLING INSTRUCTIONS	

LINE#	SPOTS	START DATE	END DATE	TIME	LENGTH	SPOTS	PROGRAM	STATION	RATE	TOTAL
LINE# 5 -F 700A-900A 10000	5	7/26	TH	1107P	30		AFR-1		22500	3045
							11292			
		7/27	F	1117P	30		AFR-1		22500	
							11292			
		7/24	T	742A	30		AFR-1		10000	
LINE# 6	4	7/25	W	844A	30		AFR-1		10000	3045
							11292			
		7/26	TH	817A	30		AFR-1		10000	
		7/27	F	712A	30		AFR-1		10000	
							11292			

PAID

MONTHLY COST PER ORDER CONFIRMATION	375000	ACTUAL GROSS BILLING	375000	SUB-TOTALS	
WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG.		AGENCY COMMISSION	56250	TOTAL RECONCILING ITEMS	
		NET DUE	318750		

[Signature]

342 393

8 0 5 0 3 0 0 2 0 0

WLOS-TV 13

P.O. BOX 2150 • ASHEVILLE, N.C. 28802

AGENCY JEFFERSON MARKETING
 BILLING 3825 BARRETT DRIVE
 ADDRESS RALEIGH, N.C. 27619

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

WLOS DATE 07/29/84

CHAR	REPRESENTATIVE	LANE/CHAR	SALESMAN
	ADVERTISER	REP. FOR	PRODUCT
	JESSE HELMS/ SEN. 413		SENATE

ORDER TYPE 2	AGENCY EST. NO. 823/974
INVOICE NO. 586-003944	P. # 98
SCHEDULE DATES 07/23/84-07/27/84	BROADCAST MONTH JULY, 1984
CONTRACT YEAR	
BILLING INSTRUCTIONS	

LINE#	TIME	DAYS	START	END	SPOTS	DATE	TIME	PRODUCT	RATE	REMARKS
1	700A-900A		10000	2	7/23	M	744A 30	AFR-1	10000	
					7/23	M	845A 30	AFR-1	10000	
-F	1200M-1230A		3000	5	7/23	M	1228A 30	AFR-1	3000	
					7/24	T	1222A 30	AFR-1	3000	
					7/25	W	1207A 30	AFR-1	3000	
					7/26	TH	1209A 30	AFR-1	3000	
					7/27	F	1215A 30	AFR-1	3000	
3	558P-630P		37500	5	7/23	M	605P 30	AFR-1	37500	
					7/24	T	627P 30	AFR-1	37500	
					7/25	W	614P 30	AFR-1	37500	
					7/26	TH	606P 30	AFR-1	37500	
					7/27	F	627P 30	AFR-1	37500	
4	1101P-1130P		22500	5	7/23	M	1139P 30	AFR-1	22500	B/BALL RUNOVER
					7/24	T	1127P 30	AFR-1	22500	
					7/25	W	1110P 30	AFR-1	22500	

MONTHLY COST PER ORDER CONFIRMATION	ACTUAL GROSS BILLING	SUB-TOTALS
WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG.	AGENCY COMMISSION	TOTAL RECONCILING ITEMS
	NET DUE	

1 6 2 7 0 5 0 8 0 9 8

HAH 342 392

AGENCY BILLING ADDRESS

JEFFERSON MARKETING

P O BOX 19807
RALEIGH, NC

27619

wspa-TV 7 827-327- 16

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

DATE 07/29/84

REPRESENTATIVE JOHN BLAIR + CO.	SALESMAN POLITICAL NATL
ADVERTISER HELMS/REP/NC SENAPD HELMS SENATE COM	PRODUCT

ORDER TYPE	AGENCY EST NO
INVOICE NO 407-3827327016	PAGE
SCHEDULE DATES 07/05/84-08/03/84	BROADCAST MONTH JULY
CONTRACT YEAR	
STANDARD BROADCAST MONTH	

SCHEDULE					ACTUAL BROADCAST								RECONCILIATION		
2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
TIME	RATE DETAIL	RATE	NO THIS MONTH	DATES	DAY	TIME	TYPE	CLASS	P/B	M/G FOR	PRODUCT/FILM NO	RATE	REMARKS	DR	CR
1228- AP	P1	250	5	07/16	M	01:28P	30	P1			HF\$ 850-A	250			
				07/17	TU	03:28P	30	P1			HF\$ 850 A	250			
				07/18	W	12:58P	30	P1			HF\$ 850 A	250			
				07/19	TH	02:28P	30	P1			HF\$ 850 A	250			
				07/20	F	03:58P	30	P1			FR-1	250			
TOTAL GROSS BILLING												1250.00	SUB-TOTALS		
AGENCY COMMISSION												187.50	TOTAL RECONCILING ITEMS		
NET DUE												1062.50			

ADVERTISER'S COST
CONFIRMATION 1250.00

WARRANT THAT THE ACTUAL
BROADCAST INFORMATION SHOWN
ON THIS INVOICE WAS TAKEN FROM
PROGRAM LOG

ACTUAL GROSS BILLING

AGENCY COMMISSION

NET DUE

1250.00

187.50

1062.50

SUB-TOTALS

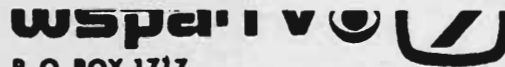
TOTAL RECONCILING
ITEMS

2905

JEFFERSON MARKETING

P O BOX 19807
RALEIGH, NC

27619



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

DATE 07/29/84

REPRESENTATIVE JOHN BLAIR + CO.	SALESMAN POLITICAL NATL
ADVERTISER HELMS/REP/NC SENAPD HELMS SENATE COM	PRODUCT HELMS SENATE COM

ORDER TYPE	AGENCY EST NO
INVOICE NO 407-3827327019	PAGE
SCHEDULE DATES 07/18/84-07/22/84	BROADCAST MONTH JULY
STANDARD BROADCAST MONTH	

SCHEDULE				ACTUAL BROADCAST										RECONCILIATION		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Y	TIME	RATE DETAIL	RATE	NO THIS MONTH	DATES	DAY	TIME	TYPE	CLASS	P/B	M/G FOR	PRODUCT/FILM NO	RATE	REMARKS	DR	CR
	658-8P	P1	600	1	07/21	SA	07:13P	30	P1			AFB-1	600	1895		

MONTHLY COST CONFIRMATION	600.00	ACTUAL GROSS BILLING	600.00	SUB-TOTALS
WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM PROGRAM LOG		AGENCY COMMISSION	90.00	TOTAL RECONCILING ITEMS
		NET DUE	510.00	

8 5 0 3 0 4 0 5 0 2 6

INVOICE AFFIDAVIT
 AGENCY: JEFFERSON MARKETING
 P.O. BOX 19807
 RALEIGH, N.C.

ATR
 7/23-7/27

WYFF-TV

WYFF-TV 07/31/84 PAGE: 1

REPRESENTATIVE	SALESMAN
PETRY OFFICES	POLITICAL/NATIONAL
ADVERTISER	PRODUCT
AMERICANS FOR REAGAN	(R) AMER FOR REAGAN

ORDER TYPE	AGENCY ESTIMATE NO
REVISION-03	
INVOICE NUMBER	BROADCAST MONTH
INV# 7121-01	6/25-07/29/84
SCHEDULE DATES	BILLING PERIOD
7/23-07/27/84	STANDARD

27619
 EMIT: WYFF-TV
 P.O. BOX 788
 GREENVILLE, SC
 ATTN: ACCOUNTING DEPT.
 29602

WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG

SCHEDULE					ACTUAL BROADCAST							RECONCILIATION						
TU	W	TH	F	SA	SU	TIME	RATE	NO.	DATES	DAY	TIME	TYPE MIN SEC	M/G FOR	PRODUCT FILM	RATE	DEBIT	CREDIT	REMARKS
X	X	X	X			M-F 7-9A	120.00	6	7/23	MO	748A	30		AFR-1-R PBHFSCM	120.00			
									7/23	MO	814A	30		AFR-1-R PBHFSCM	120.00			
									7/24	TU	758A	30		AFR-1-R	120.00			
									7/25	WE	723A	30		AFR-1-R PBHFSCM	120.00			
									7/26	TH	823A	30		AFR-1-R PBHFSCM	120.00			
									7/27	FR	720A	30		AFR-1-R PBHFSCM	120.00			

30x6

SCHEDULE COST FOR THIS BILLING PERIOD	ACTUAL GROSS BILLING	AGENCY COMMISSION	NET DUE	SUB-TOTALS	RECONCILIATION
720.00	720.00	0.00	720.00		OK

TERMS: NET 30 DAYS

INVOICE AFFIDAVIT

AGENCY: JEFFERSON MARKETING
 P.O. BOX 19807
 RALEIGH, N.C.

WYFF-TV

WYFF-TV 07/31/84 PAGE: 2

REMIT: WYFF-TV 27619
 P.O. BOX 798
 GREENVILLE, SC
 ATTN: ACCOUNTING DEPT. 29602

REPRESENTATIVE	SALESMAN
PETRY OFFICES	POLITICAL/NATIONAL
ADVERTISER	PRODUCT
AMERICANS FOR REAGAN	(R) AMERICAN 4 REAGAN

ORDER TYPE	AGENCY ESTIMATE NO
REVISION-01	
INVOICE NUMBER	BROADCAST MONTH
INVS 7206-01	6/25-07/29/84
SCHEDULE DATES	BILLING PERIOD
7/20-07/22/84	STANDARD

WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG

SCHEDULE						ACTUAL BROADCAST						RECONCILIATION						
TU	W	TH	F	SA	SU	TIME	RATE	NO.	DATES	DAY	TIME	TYPE MIN SEC	M:G FOR	PRODUCT FILM	RATE	DEBIT	CREDIT	REMARKS
					X	900PM-1130PM	900.00	1	7/22	SU	928P	30		AFR-1-1R PD3Y NCC	900.00	✓ 2623		
Breakdown																		

SCHEDULE COST FOR THIS BILLING PERIOD	ACTUAL GROSS BILLING	AGENCY COMMISSION	NET DUE	SUB-TOTALS	RECONCILIATION
2,940.00	5 8,920.00	5 0441.00	5 2,499.00		

TERMS: NET 30 DAYS

INVOICE AFFIDAVIT

AGENCY: JEFFERSON MARKETING
 P.O. BOX 19807
 RALEIGH, N.C.

WYFF-TV

100 West Main Street
 Raleigh, N.C. 27601
 Phone: (919) 833-7800

WYFF-TV 07/31/84 PAGE: 1

REMIT: WYFF-TV 27619
 P.O. BOX 788
 GREENVILLE, SC
 ATTN: ACCOUNTING DEPT. 29602

REPRESENTATIVE	SALESMAN
PETRY OFFICES	POLITICAL/NATIONAL
ADVERTISER	PRODUCT
AMERICANS FOR REAGAN	(R) AMERICAN 4 REAGAN

ORDER TYPE	AGENCY ESTIMATE NO
REVISION-01	
INVOICE NUMBER	BROADCAST MONTH
INV# 7206-01	6/25-07/29/84
SCHEDULE DATES	BILLING PERIOD
7/20-07/22/84	STANDARD

WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG

SCHEDULE						ACTUAL BROADCAST							RECONCILIATION					
TU	W	TH	F	SA	SU	TIME	RATE	NO.	DATES	DAY	TIME	TYPE MIN SEC	M/G FOR	PRODUCT FILM	RATE	DEBIT	CREDIT	REMARKS
PAID FOR BY THE NATIONAL CONGRESSIONAL CLUB AND THE HELMS FOR SENATE COMMITTEE																		
RETIMED TO RUN WITH SHOW																		
				X		100PM-0200PM	150.00	1	7/22	SU	155P	30		AFR-1-R PDBY NCC	150.00			✓ 1895
				X		BASEBALL	350.00	1	7/21	SA	407P	30		AFR-1R	350.00			✓ 2623
				X		200PM-0530PM	225.00	1	7/22	SU	521P	30		AFR-1-1R PDBY NCC	225.00			✓ 1895
				X		M-F 1230-330P	260.00	2	7/20	FR	1258P	30		AFR-1 PDBNCC	260.00			✓ 2905
									7/20	FR	258P	30		AFR-1 PDBNCC	260.00			✓ 2905
				X		M-F 9-10A	185.00	1	7/20	FR	949A	30		AFR-1 PDBHFSCM	185.00			✓ 2905
				X		M-F 7-9A	120.00	1	7/20	FR	848A	30		AFR-1 PDBNCC	120.00			✓ 2623
				X		MF 1130-1230A	140.00	1	7/20	FR	1205A	30		AFR-1 PDBNCC	140.00			✓ 2623
				X		BASEBALL	350.00	1	7/21	SA	548P	30		AFR-1-	350.00			✓ 1895

SCHEDULE COST FOR THIS BILLING PERIOD

ACTUAL GROSS BILLING

AGENCY COMMISSION

NET DUE

SUB-TOTALS

RECONCILIATION

9 6 2 7 0 5 0 3 0 5 8

OK

TERMS: NET 30 DAYS

INVOICE AFFIDAVIT

WYFF-TV

WYFF-TV 07/31/84 PAGE: 1

AGENCY: JEFFERSON MARKETING
P.O. BOX 19807
RALEIGH, N.C.

REMIT: WYFF-TV 27619
P.O. BOX 788
GREENVILLE, SC
ATTN: ACCOUNTING DEPT. 29602

REPRESENTATIVE	SALESMAN
PETRY OFFICES	POLITICAL/NATIONAL
ADVERTISER	PRODUCT
(R) JESSE HELMS	(R) JESSE HELMS/NC SEN

ORDER TYPE	AGENCY ESTIMATE NO
REVISION-02	
INVOICE NUMBER	BROADCAST MONTH
INV# 7084-01	6/25-07/29/84
SCHEDULE DATES	BILLING PERIOD
7/13-07/21/84	STANDARD

WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG

SCHEDULE						ACTUAL BROADCAST							RECONCILIATION					
TU	W	TH	F	SA	SU	TIME	RATE	NO.	DATES	DAY	TIME	TYPE MIN SEC	M/G FOR	PRODUCT FILM	RATE	DEBIT	CREDIT	REMARKS
			X			MF 1130-1230A	140.00	1	7/13	FR	1203A	30		HFS-811 PDBHFSCM	140.00			
X	X	X				1130PM-0100AM	140.00	4	7/16	MO	1234A	30		HFS-850A PDBHFSCM	140.00			
									7/17	TU	1224A	30		HFS350A PDBHFSCM	140.00			
									7/19	TH	1213A	30		HFS850A PDBHFSCM	140.00			
									7/18	WE							140.00	SCH CHG
									7/21	SA	239P	30	7/18	AFR-1-R	140.00	140.00		Extra
				X		M-F 7-9A	120.00	1	7/13	FR	747A	30		HFS-811 PDBHFSCM	120.00			
X	X	X				M-F 7-9A	120.00	4	7/16	MO	810A	30		HFS-850A PDBHFSCM	120.00			
									7/17	TU	848A	30		HFS850A PDBHFSCM	120.00			
									7/18	WE	720A	30		HFS850A PDBHFSCM	120.00			
									7/19	TH	849A	30		HFS850A PDBHFSCM	120.00			
				X		130PM-0430PM	350.00	1	7/14	SA	223P	30		HFS-811 PDBHFSCM	350.00			

SCHEDULE COST FOR THIS BILLING PERIOD

ACTUAL GROSS BILLING

AGENCY COMMISSION

NET DUE

SUB-TOTALS

RECONCILIATION

1,650.00

1,650.00

247.50

1,402.50

140.00

140.00

o/c

TERMS: NET 30 DAYS

(EMIT: WHNS-TV 21
 INTERSTATE COURT AT
 PELHAM ROAD
 GREENVILLE, SC
 29607



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

AGENCY: JEFFERSON MARKETING
 P O BOX 19807
 RALEIGH NC

REPRESENTATIVE	SALESMAN
KATZ CHARLOTTE	TURNER, MARK
ADVERTISER	PRODUCT
HELMS FOR SENATE	HELMS FOR SENATE

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

TERMS: PAYMENT DUE 15 DAYS FROM DATE OF INVOICE. MAKE CHECK PAYABLE TO PAPPAS TELECASTING OF THE CAROLINAS.

SCHEDULE				ACTUAL BROADCAST								RECONCILIATION							
TU	W	TH	F	SA	SU	TIME	RATE	NO.	DATES	DAY	TIME	TYPE MIN	SEC	M/G FOR	PRODUCT/FILM	RATE	DEBIT	CREDIT	REMARKS
				X		4-6P SUN	250.00	1	7/22	SU	452P	30		AFR-1	250.00		1895		
SCHEDULE COST FOR THIS BILLING PERIOD:							250.00	ACTUAL GROSS BILLING		250.00	AGENCY COMMISSION		37.50	PAY THIS AMOUNT		212.50	SUB-TOTALS		NET

WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG

INVOICE

AGENCY BILLING ADDRESS

JEFFERSON MARKETING, INC.
P. O. BOX 19807
RALEIGH NC 27619

JEFFERSON PILOT BROADCASTING COMPANY
ONE JULIAN PRICE PLACE
CHARLOTTE, NORTH CAROLINA 28208

WBTV
CHANNEL 3
704/374-3731

INVOICE NUMBER	DATE	PAGE
10815801	7-30-84	1
RATE CARD	BROADCAST MONTH	AGENCY
64	JULY	YES

MAKE PAYMENT TO

WBTV
ONE JULIAN PRICE PLACE
CHARLOTTE NC 28208

REPRESENTATIVE	PRODUCT	CONTRACT END DATE
LOCAL	POL FOR U S SENATE	7-26-84
ADVERTISER	SALESPERSON NUMBER	CONTRACT NUMBER
JESSE H. LIMS (R)	JEM 3050	108158
		CUSTOMER NUMBER
		109830

SCHEDULE				ACTUAL BROADCAST										RECONCILIATION	
START DATE	END DATE	MTWTFSS	TIME	RATE	SPOTS	NOT DATED	DAY	TIME	SPOTS	STATION	PROGRAM	RATE	SPOTS	AMOUNT	REMARKS
7-20	7-26	1 1 1 1 1	7-9A	125				7-20 FR	30	707A	AFR-1	125	1	125	2623
								7-23 MO	30	718A	HFS-850A	125	1	125	
								7-24 TU	30	758A	HFS-850A	125	1	125	
								7-25 WE	30	807A	HFS-850A	125	1	125	
								7-26 TH	30	820A	HFS-850A	125	1	125	
7-20	7-26	1 1 1 1 1	1130P-12M	350		5		7-20 FR	30	1134P	AFR-1	350	1	350	2623
								7-23 MO	30	1134P	HFS-850A	350	1	350	
								7-24 TU	30	1143P	HFS-850A	350	1	350	
								7-25 WE	30	1134P	HFS-850A	350	1	350	
								7-26 TH	30	1135P	HFS-850A	350	1	350	

MONTHLY COST CONFIRMATION

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

ACTUAL GROSS BILLING	2,375.00	SUB-TOTAL
AGENCY COMMISSION	356.25	TOTAL RECONCILING ITEMS
NET DUE AMOUNT	2,018.75	

86030304399

AGENCY BILLING ADDRESS
 JEFFERSON MARKETING, INC.
 P.O. BOX 19807
 RALEIGH NC 27619

JEFFERSON PILOT BROADCASTING COMPANY
 ONE JULIAN PRICE PLACE
 CHARLOTTE, NORTH CAROLINA 28208

WBTV
 CHANNEL 3
 764/374-3731

INVOICE NUMBER	10814301	DATE	7-24-84	PAGE	1
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DATE ORDERED	84	BROADCAST MONTH	JULY	RECORDS	YES
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MAKE PAYMENT TO
 WBTV
 ONE JULIAN PRICE PLACE
 CHARLOTTE NC 28208

LOCAL	POL	US SENATE	7-20-84
ADVERTISER	JESSE HELMS (R)	SALES OFFICER	JBM 3050
CONTRACT NUMBER	108143	CUSTOMER NUMBER	109838

SCHEDULE				ACTUAL BROADCAST								RECONCILIATION	
INVOICE BILLING DATES: 07/16/84-07/20/84													
7-16	7-20	1	1	1	65	7-16	MO	30	605A	✓HFS-850A	65		
						7-18	WE	30	614A	✓HFS-850A	65		
						7-20	FR	30	628A	✓AFR-1	65	2905	
7-16	7-20	1	1	1	125	7-16	MO	30	707A	✓HFS-850A	125		
						7-17	TU	30	718A	✓HFS-850A	125		
						7-19	TH	30	759A	✓HFS-850A	125		
7-16	7-20	1	1	1	200	7-16	MO	30	416P	✓HFS-850A	200		
						7-17	TU	30	359P	✓HFS-850A	200		
						7-18	WE	30	439P	✓HFS-850A	200		
						7-19	TH	30	410P	✓HFS-850A	200		
7-16	7-20	1	1		275	7-17	TU	30	501P	✓HFS-850A	275		
						7-19	TH	30	524P	✓HFS-850A	275		
7-16	7-20	1	1	1	225	7-16	MO	30	1138A	✓HFS-850A	225		
						7-17	TU	30	1224P	✓HFS-850A	225		
						7-18	WE	30	1154A	✓HFS-850A	225		
						7-19	TH	30	1205P	✓HFS-850A	225		
						7-20	FR	30	1139A	✓AFR-1	225	2905	
7-16	7-20	2	1	1	275	7-16	MO	30	1219P	✓HFS-850A	275		
						7-16	MO	30	259P	✓HFS-850A	275		
						7-17	TU	30	1145A	✓HFS-850A	275		
						7-18	WE	30	1213P	✓HFS-850A	275		
						7-19	TH	30	128P	✓HFS-850A	275		
						7-20	FR	30	1220P	✓AFR-1	275	2905	

CONTINUED NEXT PAGE

OK STM

MONTHLY COST CONFIRMATION

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

ACTUAL GROSS BILLING	SUB-TOTAL
AGENCY COMMISSION	TOTAL RECONCILING ITEMS
NET DUE AMOUNT	

ORIGINAL COPY 1

86030604400

MAILING ADDRESS
JEFFERSON MARKETING, INC.
 P. O. BOX 19807
 RALFIGH NC 27619

JEFFERSON PILOT BROADCASTING COMPANY
 ONE JULIAN PRICE PLACE
 CHARLOTTE, NORTH CAROLINA 28208

WBTV
 CHANNEL 3
 704/374-3731

10814301	7-24-84	2
RATE CARD	BROADCAST MONTH	AGENCY
84	JULY	YES

MAKE PAYMENT TO
WBTV
 ONE JULIAN PRICE PLACE
 CHARLOTTE NC 28208

REPRESENTATIVE	PRODUCT	CONTRACT END DATE
LOCAL	POL US SENATE	7-20-84
ADVERTISER	SALES REPRESENTATIVE	CONTRACT NUMBER
JESSE HELMS (R)	JBM 3050	108143
		CUSTOMER NUMBER
		109838

SCHEDULE		ACTUAL BROADCAST										RECONCILIATION	
START DATE	END DATE	MTWTFSS	TIME	LENGTH	SPOTS	DAY	START	END	DESCRIPTION	AMOUNT	REMARKS	DRAG	
					7	7-20	FR	30	258P	✓ AFR-1	275	2905	

MONTHLY COST CONFIRMATION	4,970.00	ACTUAL GROSS BILLING	4,970.00	SUB-TOTAL
We warrant that the actual broadcast information shown on this invoice was taken from the program log.		AGENCY COMMISSION	745.50	TOTAL RECONCILING ITEMS
		NET DUE AMOUNT	4,224.50	

ORIGINAL COPY 1

86030604401

AGENCY BILLING ADDRESS
 JEFFEPSON MARKETING, INC.
 P. O. BOX 19807
 RALEIGH NC 27619

JEFFERSON PILOT BROADCASTING COMPANY
 ONE JULIAN PRICE PLACE
 CHARLOTTE, NORTH CAROLINA 28208

WBTV
 CHANNEL 3
 704/374-3731

INVOICE NUMBER	DATE	PAGE
108190C1	7-24-84	1
RATE CARD	BROADCAST MONTH	AGENCY
84	JULY	YES

MAKE PAYMENT TO
 WBTV
 ONE JULIAN PRICE PLACE
 CHARLOTTE NC 28208

REPRESENTATIVE	PRODUCT	CONTRACT END DATE
LOCAL	POLITICAL	7-22-84
ADVERTISER	SALES PERSON NUMBER	CONTRACT NUMBER
AMERICANS FOR REAGAN	JBM 3050	108190
		CUSTOMER NUMBER
		109838

SCHEDULE		ACTUAL BROADCAST										RECONCILIATION	
DATE	TIME PERIOD	SPOTS	RATE	SEC	DAY	TIME	SPOTS	RATE	SEC	DAY	TIME	AMOUNT	REMARKS
INVOICE BILLING DATES: 07/20/84-07/22/84													
7-20	7-20	1	800	1	7-20	FR	30	1130P				900	1,895
7-21	7-21	1	800	1	7-21	SA	30	1131P				800	
7-22	7-22	1	700	1	7-22	SU	30	1059P				700	
7-21	7-21	1	700	1	7-21	SA	30	628P				700	
7-22	7-22	1	225	1	7-22	SU	30	953A				225	

MONTHLY COST CONFIRMATION

3,225.00

ACTUAL GROSS BILLING 3,225.00

SUB-TOTAL

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

AGENCY COMMISSION

483.75

TOTAL RECONCILING ITEMS

NET DUE AMOUNT

2,741.25

ORIGINAL COPY - 1

860304402

OK SM

AGENCY BILLING ADDRESS

JEFFERSON MARKETING, INC.
 P. O. BOX 19807
 RALEIGH NC 27619

JEFFERSON PILOT BROADCASTING COMPANY
 ONE JULIAN PRICE PLACE
 CHARLOTTE, NORTH CAROLINA 28208

WBTV
 CHANNEL 3
 704/374-3731

10010201	7-30-84	1
84	JULY	YI'S

MAKE PAYMENT TO

WBTV
 ONE JULIAN PRICE PLACE
 CHARLOTTE NC 28208

REPRESENTATIVE	LOCAL	POL	FOR US SENATE	CONTRACT END DATE	7-27-84
ADVERTISER	JESSE HELMS (R)	DATE FOR NUMBER	JBM 3050	CONTRACT NUMBER	109838

SCHEDULE				ACTUAL BROADCAST								RECONCILIATION	
7-23	7-27	1 1 1 1 1	7-9A		125		7-23	MO	30	718A ✓	AFR-1R	125	3045
							7-24	TU	30	718A ✓	AFR-1R	125	
							7-25	WE	30	758A ✓	AFR-1R	125	
							7-26	TH	30	814A ✓	AFR-1R	125	
					5		7-27	FR	30	715A ✓	AFR-1R	125	
7-23	7-27	1 1	EN ADJ		700		7-26	TH	30	658P ✓	AFR-1R	700	
							7-27	FR	30	658P ✓	AFR-1R	700	
7-23	7-27	1 1	LN ADJ		700		7-26	TH	30	1130P ✓	AFR-1R	700	
							7-27	FR	30	1130P ✓	AFR-1R	700	

MONTHLY COST CONFIRMATION	3,425.00	ACTUAL GROSS BILLING	3,425.00	SUB-TOTAL
		AGENCY COMMISSION	513.75	TOTAL RECONCILING ITEMS
		NET DUE AMOUNT	2,911.25	

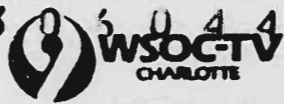
We warrant that the actual broadcast information shown on this invoice was taken from the program log.

ORIGINAL COPY

86030604403

P. O. BOX 32849
 CHARLOTTE, N.C. 28232
 ATN: ACCOUNTING

8 5 0 3 0 5 0 4 4 0 4



1901 N TRYON ST CHARLOTTE NC 28215 4999

ORDER TYPE	AGENCY ESTIMATE NO.
ORIGINAL	
INVOICE NUMBER	BROADCAST MONTH
INV# 0901-03	6/25-07/29/84
SCHEDULE DATES	BILLING PERIOD
7/13-07/26/84	STANDARD

JEFFERSON MARKETING
 P. O. BOX 18848
 RALEIGH, N.C. 27619

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

SCHEDULE					ACTUAL BROADCAST								RECONCILIATION							
LN	TR	R	UA	BU	TIME	RATE	NO.	DATE	DAY	TIME	TYPE	LG	NO FOR	COPY NUMBER	RATE	DEBIT	CREDIT	REMARKS		
		X			GOOD MORN AM	200.00	2	7/13	FR	759A	30			HFS-811	200.00					
								7/13	FR	846A	30			HFS-811	200.00					
X	X				GOOD MORN AM	200.00	8	7/16	MO	712A	30			850-A	200.00					
								7/16	MO	810A	30			HFS-811	200.00					
								7/17	TU	749A	30			850-A	200.00					
								7/17	TU	818A	30			850-A	200.00					
								7/18	WE	710A	30			850-A	200.00					
								7/18	WE	850A	30			850-A	200.00					
								7/19	TH	757A	30			850-A	200.00					
								7/19	TH	850A	30			850-A	200.00					
		X			800PM-1030PM	1500.00	2	7/13	FR	954P	30			HFS-811	1500.00					
								7/20	FR	943P	30			850-A	1500.00			-Missile 7/23		
		X			GOOD MORN AM	200.00	1	7/20	FR	759A	30			850-A	200.00			-Missile 7/23		
X	X				GOOD MORN AM	200.00	4	7/23	MO	759A	30			850-A	200.00					
								7/24	TU	810A	30			850-A	200.00					
								7/25	WE	711A	30			850-A	200.00					
								7/26	TH	810A	30			850-A	200.00					
SCHEDULE COST FOR THIS BILLING PERIOD						6,000.00	ACTUAL GROSS BILLING			6,000.00	AGENCY COMMISSION			900.00	NET DUE			5,100.00	SIGNATURES	

OK SM

WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG.

WSOC-TV
 P. O. BOX 32849
 CHARLOTTE, N.C. 0
 ATTN: ACCOUNTING
 28232

8 6 0 3 0 5 0 4 4 0 5

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

WSOC-TV VO/VO/04 FMJL 1

JEFFERSON MARKETING
 P. O. BOX 18848
 RALEIGH, N.C.
 27619

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

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

SCHEDULE							ACTUAL BROADCAST							RECONCILIATION				
TU	W	TH	F	SA	SU	TIME	RATE	NO.	DATES	DAY	TIME	SPOTS	M/G FOR	COPY NUMBER	RATE	DEBIT	CREDIT	REMARKS
			X			GOOD MORN AM	200.00	4	7/16	MO	850A	30		850-A	200.00			
									7/20	FR	710A	30		850-A	200.00			
									7/23	MO	852A	30		850-A	200.00			
									7/27	FR	759A	30		850-A	200.00			
			X			328AM-0330AM	10.00	2	7/20	FR	328A	30		850-A	10.00			
									7/27	FR	328A	30		850-A	10.00			
				X		229AM-0230AM	10.00	2	7/21	SA	329A	30		AFR-1	10.00			
									7/28	SA				REW				10.00 PGM CHA
									7/28	SA	140A	30	7/28	850-A	10.00	10.00		
				X		328AM-0330AM	10.00	2	7/22	SU	339A	30		850-A	10.00			
									7/29	SU								10.00 PGM CHA

INVOICE

NE SM

SCHEDULE COST FOR THIS BILLING PERIOD	ACTUAL GROSS BILLING	AGENCY COMMISSION	NET DUE	SUB-TOTALS	RECONCILIATION
860.00	850.00	127.50	722.50	10.00 20.00	10.00 CREDIT

WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG.

WSOC-TV

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



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

WSOC-TV 08/06/84 PAGE: 1

JEFFERSON MARKETING
 P. O. BOX 18848
 RALEIGH, N.C.
 27619

REPRESENTATIVE	SALESPERSON
	PELLETIER, JERRY
ADVERTISER	PRODUCT
HELMS FOR SEN	R/HELMS SEN/NAT CONG C

ORDER TYPE	AGENCY ESTIMATE NO.
ORIGINAL	
INVOICE NUMBER	BROADCAST MONTH
INV# 1690-03	6/25-07/29/84
SCHEDULE DATES	BILLING PERIOD
7/21-07/27/84	STANDARD

SCHEDULE										ACTUAL BROADCAST				RECONCILIATION		REMARKS		
TU	W	TH	F	SA	SU	TIME	RATE	NO.	DATES	DAY	TIME	SEC	M/G FOR	COPY NUMBER	RATE		DEBIT	CREDIT
				X		STAR SEARCH R	225.00	1	✓7/21	SA	437P	30		AFR-1REV	225.00	1895		
				X		STAR SEARCH	25.00	1	✓7/22	SU	237A	30		AFR-1REV	25.00	✓1895		
				X	X	BRITISH OPEN	700.00	1	✓7/21	SA	1241P	30		AFR1REV	700.00	✓1895		
X	X	X	X			GOOD MORN AM	200.00	5	✓7/23	MO	710A	30		AFR-1REV	200.00	3045		
									7/24	TU	840A	30		AFR-1REV	200.00			
									7/25	WE	818A	30		AFR-1REV	200.00			
									7/26	TH	746A	30		AFR-1REV	200.00			
									7/27	FR	711A	30		AFR-1REV	200.00			
				X	X	555PM-0557PM	600.00	2	✓7/26	TH	555P	30		AFR-1REV	600.00	3045		
									7/27	FR	555P	30		AFR-1REV	600.00			
X	X	X	X			1159PM-1201AM	350.00	5	✓7/23	MO	1213A	30		AFR-1REV	350.00	3045		
									7/24	TU	1200A	30		AFR-1REV	350.00			
									7/25	WE	1155P	30		AFR-1REV	350.00			
									7/26	TH	1200A	30		AFR-1REV	350.00			
									7/27	FR	1200A	30		AFR-1REV	350.00			

INVOICE FROM

OK SW

SCHEDULE COST FOR THIS BILLING PERIOD	ACTUAL GROSS BILLING	AGENCY COMMISSION	NET DUE	SUB-TOTALS	RECONCILIATION
4,900.00	4,900.00	735.00	4,165.00		

8 6 0 3 0 3 GROUP 4 0 7 Reason #2

INVOICE

EMIT TO: WPCQ-TV
 P O BOX 75089
 CHARLOTTE NC 28275

Westinghouse Broadcasting and Cable, Inc.
 WPCQ-TV
 CHARLOTTE

INVOICE NUMBER: 20-316566

PAGE 1

9160
 JEFFERSON MARKETING
 P. O. BOX 19807
 RALEIGH NC 27619

AGENCY EST. NO.: SUSAN MILLER
 AGENCY CONTACT: 20-1778-99
 CONTRACT NUMBER:
 CONTRACT DATE: 07/19/84

INVOICE DATE: 07/22/84 TERMS DUE AUG. 15, 1984

08096
 NAT'L REPUBLICAN CONGRSS.COMM.
 310 1ST ST. S.E.
 WASHINGTON DC 20003

PRODUCT NAME: AMERICANS FOR R
 PRODUCT CODE: 1302

BROADCAST DATES: 07/20/84 - 07/22/84

ACCOUNT OFFICE: FRANK MACK
 WPCQ-TV

LINE CLASS	RATE GROUP	LENGTH	SCHEDULE DATES ACTUAL DATES	SCHEDULE PER DAY	PER WEEK	TOTAL SPOTS	SCHEDULE TIME ACTUAL TIME	M/G FOR	ITEM RATE	COMMERCIAL MATERIAL AGENCY LD/REMARKS	RECONCILIATION VARIANCE	AMOUNT
01		030S	07/20-07/20 07/20 07/20	F		1	0658A-0900A 0325P	07/20	4500	AFR 1R ✓ 2623	PRE-EMPTED	4500 4500
			ITEM-TOTALS			1			*****4500			
02		030S	07/20-07/20 07/20	F		1	1128P-1230A 1206A		12500	AFR 1R ✓ 2623		
			ITEM-TOTALS			1			****12500			
03		030S	07/22-07/22 07/22 07/22 ✓	S		1	0858P-1100P 1128P	07/22	80000	AFR 1R ✓ 2623	PRE-EMPTED	80000 80000
			ITEM-TOTALS			1			****80000			
04		030S	07/20-07/20 07/20 07/20	F		2	0858A-0359P 0300P 0355P	M-F 9A-4PM	5000 5000	AFR 1R ✓ 2905 AFR 1R ✓ 2905		
			ITEM-TOTALS			2			****10000			

WARRANTY
 WE WARRANT THAT THE ABOVE BROADCASTS WERE MADE ACCORDING TO THE OFFICIAL STATION LOG.
 *TIME APPROX. - WITHIN 15 MINUTES

TOTAL BROADCAST	GROSS BILLING	1,070.00
	NON-COM AMOUNT	.00
	COMMISSIONABLE TOTAL	1,070.00
	AGENCY COMMISSION	160.50
PAY THIS AMOUNT	NET BILLING	909.50

DIRECT INQUIRY TO
 JOYCE PETTIT
 C/O WPCQ-TV
 704-536-3636
 CHARLOTTE
 NC 28218

TOTAL CREDITS	84500
TOTAL DEBITS	84500
TOTAL ITEMS RECONCILING	

ORIGINAL INVOICE

8 6 0 3 0 3 GNDUM 4 0 8

INVOICE

EMIT TO: **WPCO-TV**
P.O. BOX 75009
CHARLOTTE

NC 20275



Westinghouse Broadcasting and Cable, Inc.

20-516664

PAGE: 1

IN QUNT ITH: **9160**
JEFFERSON MARKETING
P.O. BOX 19807
RALEIGH

NC 27619

WPCO-TV
CHARLOTTE

AGENCY EST. NO.:
 AGENCY CONTACT: **SUSAN MILLER**
 CONTRACT NUMBER: **20-5779-99**
 CONTRACT DATE: **07/27/84**

07/27/84 TERMS DUE AUG, 15, 1984

OR: **08096**
NAT'L REPUBLICAN CONGRESS COMM
310 1ST ST, S.W.
WASHINGTON DC 20003

PRODUCT NAME: **AMERICANS FOR R**
 PRODUCT CODE: **1302**

07/23/84 - 07/27/84

FRANK MACK
 OFFICE: WPCO-TV

LINE CLASS	RATE GROUP	LENGTH	SCHEDULE DATES ACTUAL DATES	SPOTS	SPOTS PER WEEK	START TIME	STOP TIME	SPOTS	ITEM RATE	COMM
		0300	07/23-07/27	MTWTF	5			5	0650A-0900A	
			07/23	M					4500	APR. 1R
			07/24	T					4500	APR. 1R
			07/25	W					4500	APR. 1R
			07/26	T					4500	APR. 1 R
			07/27	F					4500	APR. 1 R
			ITEM-TOTAL					5	***22500	3045

OK SW

WARRANTY
 I WARRANT THAT THE ABOVE BROADCASTS WERE MADE ACCORDING TO THE OFFICIAL SCHEDULE LISTED HEREIN APPROX. WITHIN 15 MINUTES.

TOTAL BROADCAST 5
 GROSS BILLING 22500
 NON-COM. AMOUNT 000
 COMMISSIONABLE TOTAL 22500
 AGENCY COMMISSION 3275

PAY THIS AMOUNT **NET BILLING** 19225

DIRECT INQUIRY TO:
JOYCE PETTIT
C/O WPCO-TV
700-536-5556
CHARLOTTE
NC 28210

TOTAL CREDITS
 TOTAL DEBITS
 TOTAL ITEMS RECONCILING

8 6 0 3 **WCCB-18**
TELEVISION
 One Television Place
 Charlotte, N.C. 28205

DATE 7/29/84 1454-00074

POLITICAL		BROADCAST MONTH
INVOICE NO. 40710563	PAGE 1	JULY
SCHEDULE DATES 7/29/84 - 8/12/84		CONTRACT YEAR
BILLING INSTRUCTIONS		
STANDARD BROADCAST SCHEDULE		

REP: [unclear]
 SLSP: [unclear]
 ADV: [unclear]
 PROD: [unclear]

SCHEDULE				ACTUAL BROADCAST							RECONCILIATION		
DESCRIPTION	PRICE	RATE	NUMBER THIS PER	DATE	DAY	TIME	LENGTH	M/G FOR	PRODUCT DESCRIPTION	PRICE	REMARKS	DR	CR
100			1						NR 1	50	2905		
									NR 850	50			
100			2						NR 1	100	2905		
									NR 850	100			
100			3						NR 1	120	2905		
									NR 850	120			
100			2						NR 1	120	2905		
									NR 850	120			

NO COST
 CONFIRMATION

WARRANT THAT THE ACTUAL
 BROADCAST INFORMATION SHOWN ON
 THIS INVOICE WAS TAKEN FROM THE
 STATION LOG.

ACTUAL GROSS BILLING	780.00	SUB-TOTALS	
AGENCY COMMISSION	117.00	TOTAL RECONCILING	
NET DUE	663.00	ITEMS	.00

ok sm.

8 6 0 3 6
WCCB-18
TELEVISION
 One Television Place
 Charlotte, N.C. 28205

111851
 JEFFERSON MARKETING INC
 P.O. BOX 19807
 RALEIGH NC 27619

REP: PATZ
 SLSP: S MARK TURNER
 ADV: POLITICAL
 PROD: HELMS REP FOR SENGLE

DATE 7/25/84 1454-0007B

POLITICAL		BROADCAST MONTH
INVOICE NO. 40710205	PAGE 1	JULY
SCHEDULE DATES 7/21/84- 7/22/84		CONTRACT YEAR
BILLING INSTRUCTIONS		
STANDARD BROADCAST CALENDAR		

SCHEDULE				ACTUAL BROADCAST								RECONCILIATION		
SCHEDULE DESCRIPTION	PRICE	RATE	NUMBER THIS WEEK	DATE	DAY	TIME	LENGTH	M/G FOR	PRODUCT DESCRIPTION	PRICE	REMARKS	DR	CR	
N-6P	90	?	2	7/21	SA	12:12P	:30		AFR-1	90	AIRED INCO RRECTLY 1895			
				7/21	SA	4:46P	:30		AFR-1	90				
-6P	100	?	3	7/22	SU	12:53P	:30		AFR-1	0			100	
				7/22	SU	5:40P	:30		AFR-1	100				
				7/22	SU	5:58P	:30		AFR-1	100				

MOD COST
 CONFIRMATION 480.00

WARRANT THAT THE ACTUAL
 BROADCAST INFORMATION SHOWN ON
 THIS INVOICE WAS TAKEN FROM THE
 PROGRAM LOG

ACTUAL GROSS BILLING 380.00
 AGENCY COMMISSION 57.00
 NET DUE 323.00

SUB-TOTALS 100
 TOTAL RECONCILING
 ITEMS 100.00CR
 Made good
 Sun 7/29

OK. SM

8 6 0 3 0 6 0 4 4 1 1



wfmy-TV

P.O. Box TV-3 • Greensboro, North Carolina 27430 • (919) 379-9300
A News-Watch Television Station

AGENCY/CLIENT

AGENCY: JEFFERSON MARKETING
BILLING: PO BOX 19807
ADDRESS: RALEIGH, N.C. 27619

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

WFMY DATE 07/29/84

REPRESENTATIVE	SALESMAN
ADVERTISER	PRODUCT
HELMS FOR SENATE	(R)CAD F/US SENATE
119	

ORDER TYPE	2	AGENCY EST. NO.	532
INVOICE NO.	403-048763	PAGE	1
SCHEDULE DATES	07/20/84-07/26/84	BROADCAST MONTH	JULY, 1984
BILLING INSTRUCTIONS		CONTRACT YEAR	

LINE#	M-TH	TIME	DAYS	START	END	SEC	SPOTS	PROGRAM	RATE	TOTAL
1		600A-800A		7/20	7/26	30	5	AFR-1 HFS-850-A HFS-850-A HFS-850-A HFS-850-A	9000	45000
2		357P-600P		7/21	7/21	30	1	AFR-1(R)	45000	45000

MONTHLY COST PER ORDER CONFIRMATION	90000	ACTUAL GROSS BILLING	90000	SUB-TOTALS	
WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG.		AGENCY COMMISSION	13500	TOTAL RECONCILING ITEMS	
		NET DUE	76500		

DUE 15TH OF MONTH FOLLOWING BROADCAST

OK SM

HLR HLR 712 271

8 6 0 3 0 6 0 4 4 1 2



wfmy-TV

P.O. Box TV-3 • Greensboro, North Carolina 27402 • (919) 375-2940
A News-Week Television Station

AGENCY/CLIENT

AGENCY: JEFFERSON MARKETING
BILLING: PO BOX 19807
ADDRESS: RALEIGH, N.C. 27619

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

WFMY DATE 07/29/84

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

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

LINE#	TIME	DAYS	START	END	SPOTS	DATE	DAY	TIME	PROGRAM	RATE	TOTAL
LINE# 10 -F	1200N- 330P	8	7/17	T	1005A	30	7/17	T	HFS-850-A	8500	8500
			7/18	W	944A	30	7/18	W	HFS-850-A	8500	8500
			7/19	TH	1128A	30	7/19	TH	HFS-850-A	8500	8500
			7/23	M	1059A	30	7/23	M	HFS-850-A	8500	8500
			7/24	T	959A	30	7/24	T	HFS-850-A	8500	8500
			7/25	W	1058A	30	7/25	W	HFS-850-A	8500	8500
			7/26	TH	1005A	30	7/26	TH	HFS-850-A	8500	8500 ✓
			7/16	M	1215P	30	7/16	M	HFS-850-A	13000	13000
LINE# 11 F	1200N- 330P	10	7/17	T	1216P	30	7/17	T	HFS-850-A	13000	13000
			7/18	W	1225P	30	7/18	W	HFS-850-A	13000	13000
			7/19	TH	1215P	30	7/19	TH	HFS-850-A	13000	13000
			7/20	F	128P	30	7/20	F	AFR-1	13000	13000
			7/23	M	1225P	30	7/23	M	HFS-850-A	13000	13000
			7/24	T	1228P	30	7/24	T	HFS-850-A	13000	13000
			7/25	W	159P	30	7/25	W	HFS-850-A	13000	13000
			7/26	TH	1206P	30	7/26	TH	HFS-850-A	13000	13000
7/27	F	129P	30	7/27	F	HFS-850-A	13000	13000 ✓			
LINE# 12	300A- 459A	4	7/16	M	152P	30	7/16	M	HFS-850-A	13000	13000
			7/20	F	1216P	30	7/20	F	AFR-1	13000	13000
LINE# 13	300A- 459A	2	7/23	M	158P	30	7/23	M	HFS-850-A	13000	13000
			7/27	F	1226P	30	7/27	F	HFS-850-A	13000	13000 ✓
LINE# 13	300A- 459A	2	7/20	F	305A	30	7/20	F	AFR-1	1000	1000
			7/27	F	305A	30	7/27	F	HFS-850-A	1000	1000 ✓

MONTHLY COST PER ORDER CONFIRMATION	453000	ACTUAL GROSS BILLING	453000	SUB-TOTALS	OK 5M
WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG.		AGENCY COMMISSION	6750	TOTAL RECONCILING ITEMS	
		NET DUE	385500	IAS 740	269

DUE 15TH OF MONTH FOLLOWING BROADCAST

8 5 0 3 0 5 0 4 4 1 3



wfmy.tv

P.O. Box TV-3 • Greensboro, North Carolina 27426 • (919) 379-9369
A Home-Video Television Station

AGENCY/CLIENT

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

WFMY TELEVISION CORP
P O BOX TV2
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. NO. 532
INVOICE NO. 403-048761	PAGE 1	BROADCAST MONTH JULY, 1984
SCHEDULE DATES 07/16/84-08/12/84		CONTRACT YEAR
BILLING INSTRUCTIONS		

LINE#	TIME	DAYS	START	END	SPOTS	DATE	DAY	PROGRAM	SPOTS	RATE	TOTAL
F LINE# 1	600A- 800A	10	9000	7/16	M	731A	30	HFS-850-A	9000	9000	2000
				7/17	T	720A	30	HFS-850-A	9000		
				7/18	W	721A	30	HFS-850-A	9000		
				7/19	TH	734A	30	HFS-850-A	9000		
				7/20	F	726A	30	AFR-1	9000		
				7/23	M	759A	30	HFS-850-A	9000		
				7/24	T	759A	30	HFS-850-A	9000		
				7/25	W	659A	30	HFS-850-A	9000		
				7/26	TH	732A	30	HFS-850-A	9000		
				7/27	F	629A	30	HFS-850-A	9000		
-F LINE# 2	800A- 900A	10	4500	7/16	M	850A	30	HFS-850-A	4500	4500	2000
				7/17	T	856A	30	HFS-850-A	4500		
				7/18	W	846A	30	HFS-850-A	4500		
				7/19	TH	835A	30	HFS-850-A	4500		
				7/20	F	840A	30	AFR-1	4500		
				7/23	M	847A	30	HFS-850-A	4500		
				7/24	T	835A	30	HFS-850-A	4500		
				7/25	W	840A	30	HFS-850-A	4500		
				7/26	TH	849A	30	HFS-850-A	4500		
				7/27	F	835A	30	HFS-850-A	4500		
-F LINE# 5	358P- 401P	4	12500	7/19	TH	358P	30	HFS-850-A	12500	12500	2000
				7/20	F	359P	30	AFR-1	12500		
				7/24	T	358P	30	HFS-850-A	12500		
J LINE# 9	657A- 858A	4	4000	7/22	SU	659A	30	AFR-1(R)	4000	4000	2000
				7/22	SU	829A	30	AFR-1(R)	4000		
				7/29	SU	658A	30	HFS-850-A	4000		
				7/29	SU	759A	30	HFS-850-A	4000		
-TH	900A-1200N		8500	7/18	M	1005A	30	HFS-850-A	8500		

MONTHLY COST PER ORDER CONFIRMATION	ACTUAL GROSS BILLING	SUB-TOTALS
WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG.	AGENCY COMMISSION	TOTAL RECONCILING ITEMS
	NET DUE	

DUE 15TH OF MONTH FOLLOWING BROADCAST

NIAS 740

8 6 0 3 0 6 0 4 4 1 4



wfmy-TV

P.O. Box TV-2 • Greensboro, North Carolina 27420 • (919) 379-9369
A Meadmark Television Station

AGENCY/CLIENT

AGENCY JEFFERSON MARKETING
BILLING PO BOX 19807
ADDRESS RALEIGH, N.C. 27619

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

WFMY DATE 07/22/84

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

ORDER TYPE 2	AGENCY EST. NO. 532
INVOICE NO. 403-048595	BROADCAST MONTH JULY, 1984
SCHEDULE DATES 07/20/84-07/22/84	CONTRACT YEAR
BILLING INSTRUCTIONS	

SCHEDULED				ACTUAL BROADCAST								RECONCILIATION		
LINE#	TIME	DAYS	RATE	DATE	DAY	TIME	TYPE	CLASS	P/B	MG FOR	PRODUCT/FILM AC	RATE	MARK	COM
LINE# 1	728P- 731P		44000	7/20	F	729P 30					AFR-1	44000		
A LINE# 2	130P- 357P		7500	7/21	SA	146P 30					AFR-1(R)	7500		
A LINE# 3	357P- 558P		45000	7/21	SA	530P 30					AFR-1(R)	45000		
J LINE# 4	558P- 601P		52500	7/22	SU	558P 30					AFR-1(R)	52500		
MONTHLY COST PER ORDER CONFIRMATION			149000	ACTUAL GROSS BILLING								149000	SUB-TOTALS	
WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG.				AGENCY COMMISSION								22350	TOTAL RECONCILING ITEMS	
				NET DUE								126650	HIAH 380	

DUE 15TH OF MONTH FOLLOWING BROADCAST

8 5 0 3 0 5 0 4 4 1 5



wfmy-TV

P.O. Box TV-3 • Greensboro, North Carolina 27438 • (919) 379-8989
A News-Headline Television Station

AGENCY/CLIENT

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

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

WFMY DATE 07/29/84

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

ORDER TYPE 2	AGENCY EST. NO. 532
INVOICE NO. 403-048762	PAGE 1
SCHEDULE DATES 07/23/84-07/27/84	BROADCAST MONTH JULY, 1984
CONTRACT YEAR	
BILLING INSTRUCTIONS	

LINE #	TIME	DAYS	START	END	SEC	SPOTS	PAID FOR BY	PROGRAM	SPOTS	AMOUNT	PRODUCT	AMOUNT
F	600A - 800A						PAID FOR BY HELMS FOR SENATE AND NATIONAL CONGRESSIONAL CLUB					
			7/23	M	655A	30		AFR-1(R)		10000		
			7/24	T	615A	30		AFR-1(R)		10000		
			7/25	W	622A	30		AFR-1(R)		10000		
LINE # 1			7/26	TH	720A	30	5	AFR-1(R)		10000		
			7/27	F	721A	30		AFR-1(R)		10000		
-F	558P - 601P											
LINE # 2			7/26	TH	558P	30	2	AFR-1(R)		52500		
			7/27	F	558P	30		AFR-1(R)		52500		
-F	1058P - 1101P											
LINE # 3			7/26	TH	1059P	30	2	AFR-1(R)		110000		
			7/27	F	1059P	30		AFR-1(R)		110000		

MONTHLY COST PER ORDER CONFIRMATION	375000	ACTUAL GROSS BILLING	375000	SUB-TOTALS	OKW
WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG.		AGENCY COMMISSION	56250	TOTAL RECONCILING ITEMS	
		NET DUE	318750		

DUE 15TH OF MONTH FOLLOWING BROADCAST

HLAS 519 270

AGENCY BILLING ADDRESS
 JEFFERSON MARKETING
 P.O. BOX 19807
 RALEIGH NC 27619

GUILFORD TELECASTERS, INC.
 P.O. BOX 1618
 GREENSBORO, NC 27402

WGGT-TV

INVOICE NUMBER	DATE	PAGE
8407603443	7-29-84	1

RATE CARD	BROA	CA	MONTHS	AGENCY
202	02		JULY	YES

MAKE PAYMENT TO
 WGGT-TV
 P.O. BOX 1618
 GREENSBORO, NC 27402

REPRESENTATIVE	PRODUCT	CONTRACT END DATE
CLT PETRY	CAND FOR US SENATE	7-29-84
ADVERTISER	SALESPERSON NUMBER	CONTRACT NUMBER
JESSE HELMS -REP-	SHO 4202	603443
		CUSTOMER NUMBER
		006708

SCHEDULE			ACTUAL BROADCAST										RECONCILIATION		
START DATE	END DATE	MTWTFSS	TIME	SPOTS	PLAN	RATE	NO.	DATE	DAY	LENGTH	TIME	STATION	SPOTS	AMOUNT	REMARKS
7-09	7-15		7-730P	1		100	1	7-13	FR	30	729P	HFS-811		100	
7-16	7-22	1 1 1	7-730P			100		7-16	MO	30	715P	HFS-850A		100	
								7-18	WE	30	704P	HFS-850A		100	
								7-20	FR	30	728P	AFB-1		100	(2623)
7-23	7-29	1 1	7-730P			100		7-23	MO	30	716P	HFS-850A		100	
								7-25	WE	30	728P	HFS-850A		100	
7-23	7-29	1 1	CAMELOT			200		7-23	MO	30	928P	HFS-850A		200	
								7-24	TU	30	841P	HFS-850A		200	
7-16	7-22		7-9AM	1			1	7-20	FR	30	816A	HFS-850A		N/C	
7-23	7-29	1 1 1 1	7-9AM					7-23	MO	30	807A	HFS-850A		N/C	
								7-24	TU	30	859A	HFS-850A		N/C	
								7-25	WE	30	718A	HFS-850A		N/C	
							4	7-26	TH	30	815A	HFS-850A		N/C	

MONTHLY COST CONFIRMATION

1,000

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

ACTUAL GROSS BILLING	1,000.00	SUB-TOTAL
AGENCY COMMISSION	150.00	TOTAL RECONCLING ITEMS
NET DUE AMOUNT	850.00	OK SM

ORIGINAL COPY

8600504416

AGENCY BILLING ADDRESS
 JEFFERSON MARKETING
 P. O. BOX 19807
 RALEIGH NC 27619

MAKE PAYMENT TO
 WGHP-TV, INC.
 P.O. BOX 2688
 HIGH POINT, N.C. 27261

INVOICE NUMBER	DATE	PAGE
8407386865	7-29-84	1
RATE CARD #	BROADCAST MONTH	AGENCY
323 1C	JULY	YES

REPRESENTATIVE	PRODUCT	CONTRACT END DATE
LOCAL	R-CAND/U.S.SENATE/K	7-26-84
ADVERTISER	SALESPERSON NUMBER	CONTRACT NUMBER
HELMS FOR SENATE COM	POL 7002	386865
		331799

SCHEDULE										ACTUAL BROADCAST										RECONCILIATION	
START DATE	END DATE	MTWTFSS	SPOTS	SEC	TIME PERIOD	PLAN	RATE	NO.	DATED	DAY	LENGTH	TIME	LINE NO.	AGENCY COPY NUMBER	DESCRIPTION	AMOUNT	REMARKS				
7-20	7-20		1		8-11PM/BB		790	1	7-20	FR	30	814P		C 588/AFR-1R		790	2623				
7-23	7-23	1			8-11PM/BB		850	1	7-23	MO	30	838P		242/HFS-850-A		850					
7-26	7-26		1		8-11PM/OG		500	1	7-26	TH	30	928P		242/HFS-850-A		1500					
7-22	7-22			1	1000A0130P		350	1	7-22	SU	30	1138A		588/AFR-1R		350					
7-20	7-20			2	7-9AM		75		7-20	FR	30	713A		588/AFR-1		75	2623				
				2					7-20	FR	30	819A		588/AFR-1		75					
7-23	7-26	2 2 2 2			7-9AM		75		7-23	MO	30	809A		242/HFS-850-A		75					
									7-23	MO	30	846A		242/HFS-850-A		75					
									7-24	TU	30	713A		242/HFS-850-A		75					
									7-24	TU	30	851A		242/HFS-850-A		75					
									7-25	WE	30	717A		242/HFS-850-A		75					
									7-25	WE	30	819A		242/HFS-850-A		75					
									7-26	TH	30	724A		242/HFS-850-A		75					
								8	7-26	TH	30	816A		242/HFS-850-A		75					

MONTHLY COST CONFIRMATION	4,240	ACTUAL GROSS BILLING	4,240.00	SUB-TOTAL
We warrant that the actual broadcast information shown on this invoice was taken from the program log.		AGENCY COMMISSION	636.00	TOTAL RECONCILING ITEMS
		NET DUE AMOUNT	3,604.00	OK 8M

ORIGINAL COPY

860504417

AGENCY BILLING ADDRESS
 JEFFERSON MARKETING
 P. O. BOX 19807
 RALEIGH NC 27619

MAKE PAYMENT TO
 WGHP-TV, INC.
 P.O. BOX 2608
 HIGH POINT, N.C. 27261

INVOICE NUMBER	DATE	PAID
8407386902	7-29-84	
RATE CARD	BROADCAST MONTH	AGENCY
320 1C	JULY	YES

REPRESENTATIVE	PRODUCT	CONTRACT END DATE
LOCAL	R-CAND/P & S	7-22-84
ADVERTISER	SALESPERSON NUMBER	CONTRACT NUMBER
AMER. FOR REG/HELMS S	POL 7002	386902
		CUSTOMER NUMBER
		831799

SCHEDULE				ACTUAL BROADCAST								RECONCILIATION			
DATE	TIME	SPOTS	PROGRAM	SPOTS	DATE	DAY	TIME	PROGRAM	SPOTS	DATE	DAY	TIME	PROGRAM	SPOTS	REMARKS
7-20	7-20	1	600-7 AM	20	1	7-20	FR	30	637A				588/AFR-1	20	✓ ✓ 2905
7-20	7-20	1	12N-1230P	75	1	7-20	FR	30	1229P				588/AFR-1	75	✓ ✓ 2905
7-21	7-21	1	12M-1AM	30	1	7-21	SA	30	1230M				588/AFR-1R	30	✓ ✓ 2905
7-22	7-22	2	7A-1030A	30		7-22	SU	30	758A				588/AFR-1R	30	✓ ✓ 2905
					2	7-22	SU	30	858A				588/AFR-1R	30	✓ ✓ 2905

MONTHLY COST CONFIRMATION	185	ACTUAL GROSS BILLING	185.00	SUB-TOTAL	AFK
We warrant that the actual broadcast information shown on this invoice was taken from the program log.		AGENCY COMMISSION	27.75	TOTAL RECONCILING ITEMS	
		NET DUE AMOUNT	157.25		

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86050504418

OS SM
Womens 11/21/84

AGENCY BILLING ADDRESS -
 JEFFERSON MARKETING
 P. O. BOX 19807
 RALEIGH NC 27619

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

INVOICE NUMBER	DATE	
8407386901	7-29-84	
RATE CARD	BROADCAST MONTH	AGENCY
319 1C	JULY	YES

REPRESENTATIVE	PRODUCT	CONTRACT END DATE
LOCAL	R-CAND/U.S. SENATE/A	7-22-84
ADVERTISER	SALESPERSON NUMBER	CONTRACT NUMBER
AMER. FOR REG/HELMS S	POL 7002	386901
		CUSTOMER NUMBER
		831799

SCHEDULE										ACTUAL BROADCAST										RECONCILIATION	
DATE	TIME	SEC	LEN	SPOTS	PLAN	RATE	NO.	DATE	DAY	LENGTH	TIME	STATION	SPOTS	AMOUNT	REMARKS	AMOUNT	REMARKS				
✓7-20	7-20			1		425	1	7-20	FR	30	659P	C 588/AFR-1R		425							
✓7-22	7-22			1		200	1	7-22	SU	30	559P	588/AFR-1R		200							
✓7-21	7-21			1		325	1	7-21	SA	30	121P	588/AFR-1R		325							
✓7-22	7-22			1		325	1	7-22	SU	30	1051A	588/AFR-1R		325							
✓7-22	7-22			1		350	1	7-22	SU	30	449P	588/AFR-1R		350							

1895

MONTHLY COST CONFIRMATION	1,625	ACTUAL GROSS BILLING	1,625.00	SUB-TOTAL
We warrant that the actual broadcast information shown on this invoice was taken from the program log.		AGENCY COMMISSION	243.75	TOTAL RECONCILING ITEMS
		NET DUE AMOUNT	1,381.25	OK SM

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860304419

AGENCY BILLING ADDRESS

JEFFERSON MARKETING
 P. O. BOX 19807
 RALEIGH NC 27619

INVOICE NUMBER: 8407386887 DATE: 7-29-84 PAGE: 1

RATE CARD: 325 BROADCAST MONTH: JULY AGENCY: YES

MAKE PAYMENT TO
 WGHP-TV, INC.
 P.O. BOX 2688
 HIGH POINT, N.C. 27261

REPRESENTATIVE LOCAL	PRODUCT R-CAND/U.S. SENATE	CONTRACT END DATE 7-27-84
ADVERTISER HELMS FOR SENATE COM	SALESPERSON NUMBER POL 7002	CONTRACT NUMBER 386887
		CUSTOMER NUMBER 331799

SCHEDULE				ACTUAL BROADCAST								RECONCILIATION	
DATE	TIME	SPOTS	SECS	DATE	DAY	LENGTH	SPOTS	AMOUNT	DESCRIPTION	AMOUNT	REMARKS		
7-23	7-27	1	1	1	1	1	7	75	7-23 MO 30 752A ✓	588/AFR-1R	75		
									7-24 TU 30 818A ✓	588/AFR-1R	75		
									7-25 WE 30 745A ✓	588/AFR-1R	75		
									7-26 TH 30 758A ✓	588/AFR-1R	75		
							5		7-27 FR 30 818A ✓	588/AFR-1R	75		
7-23	7-27	1	1	1	1	1	5	100	7-23 MO 30 1158P ✓	588/AFR-1R	100		
									7-24 TU 30 1152P ✓	588/AFR-1R	100		
									7-25 WE 30 1136P ✓	588/AFR-1R	100		
									7-26 TH 30 1151P ✓	588/AFR-1R	100		
							5		7-27 FR 30 1141P ✓	588/AFR-1R	100		
7-26	7-27						2	425	7-26 TH 30 659P ✓	588/AFR-1R	425		
									7-27 FR 30 659P ✓	588/AFR-1R	425		
7-26	7-27						2	225	7-26 TH 30 746P ✓	588/AFR-1R	225		
									7-27 FR 30 715P ✓	588/AFR-1R	225		

v 3045

MONTHLY COST CONFIRMATION

2,175

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

ACTUAL GROSS BILLING	2,175.00	SUB-TOTAL
AGENCY COMMISSION	326.25	TOTAL RECONCILING ITEMS
NET DUE AMOUNT	1,848.75	OK 9/11

ORIGINAL COPY

86030604420

AGENCY BILLING ADDRESS

JEFFERSON MARKETING INC
P O BOX 19807
RALEIGH N.C. 27619

WRAL-TV
2619 WESTERN BOULEVARD
RALEIGH, NORTH CAROLINA 27605

CHANNEL 5
919-821-8556

INVOICE NUMBER	DATE	PAGE
46628001	7-30-84	1
RATE CARD	BROADCAST MONTH	AGENCY
36	JULY	YES

MAKE PAYMENT TO

WRAL-TV
ACCOUNTING DEPT
P O BOX 12000
RALEIGH NC 27605

*ok'd
Lip*

REPRESENTATIVE	PRODUCT	CONTRACT END DATE
LOCAL	POL AMER. REAGAN	7-27-84
ADVERTISER	SALESPERSON NUMBER	CONTRACT NUMBER
NCC - HELMS COMM	QKO 0024	466280
		CUSTOMER NUMBER
		640930

SCHEDULE										ACTUAL BROADCAST										RECONCILIATION			
START DATE	END DATE	M	T	W	T	F	S	S	AC	TIME PERIOD	PLAN	RATE	NO.	DATES	DAY	LENGTH	TIME	AGENCY	CITY	NUMBER	DESCRIPTION	AMOUNT	REMARKS
7-23	7-27	1	1	1	1	1				7-9A	3	225		7-23	MO	30	754A	AFR-1R	1929/1	(REP)	225	3045	
														7-24	TU	30	848A	AFR-1R	1929/1	(REP)	225		
														7-25	WE	30	719A	AFR-1R	1929/1	(REP)	225		
														7-26	TH	30	810A	AFR-1R	1929/1	(REP)	225		
													5	7-27	FR	30	759A	AFR-1R	1929/1	(REP)	225		
7-20	7-20						2			7-9A	3	225		7-20	FR	30	745A	AFR-1R	1929/1	(REP)	225	2623 2623	
													2	7-20	FR	30	859A	AFR-1R	1929/1	(REP)	225		

MONTHLY COST CONFIRMATION	1,575.00	ACTUAL GROSS BILLING	1,575.00	SUB-TOTAL
We warrant that the actual broadcast information shown on this invoice was taken from the program log.		AGENCY COMMISSION	236.25	TOTAL RECONCILING ITEMS
<i>Leah S. Chauncey, Bus. Mgr.</i> <i>Kathy Shurer</i> My Commission Expires 11-20-88		NET DUE AMOUNT	1,338.75	

ORIGINAL COPY

86030504421

INVOICE

AGENCY BILLING ADDRESS

JEFFERSON MARKETING INC
P O BOX 19807
RALEIGH N.C. 27619

WRAL-TV
2619 WESTERN BOULEVARD
RALEIGH, NORTH CAROLINA 27605

CHANNEL 5
919-821-8556

INVOICE NUMBER	DATE	PAGE
46628201	7-30-84	1
RATE CARD	BROADCAST MONTH	AGENCY
36	JULY	YES

MAKE PAYMENT TO

WRAL-TV
ACCOUNTING DEPT
P O BOX 12000
RALEIGH NC 27605

REPRESENTATIVE	PRODUCT	CONTRACT END DATE
LOCAL	POL AMER FOR REGAN	7-22-84
ADVERTISER	SALESPERSON NUMBER	CONTRACT NUMBER
NCC/HELMS SEN. COMM	QKO 0024	466282
		CUSTOMER NUMBER
		640930

SCHEDULE										ACTUAL BROADCAST				RECONCILIATION									
START DATE	END DATE	M	T	W	T	F	S	S	RO	TIME PERIOD	PLAN	RATE	NO.	DATE	DAY	LENGTH	TIME	M/O FOR	AGENCY COPY NUMBER/DESCRIPTION	AMOUNT	REMARKS	TRUCK	
7-16	7-22								2	5A-12N	3	35		7-22	SU	30	638A		AFR-1R 1929/1 (REP)	35	2905 missed JLS pot 127		
													2	7-22	SU	30	759A		AFR-1R 1929/1 (REP)	35			
7-16	7-22								1	9-10A	3	100	1	7-22	SU	30	912A		AFR-1R 1929/1 (REP)	100			
7-16	7-22								1	5-6P	3	250	1	7-22	SU	30	502P		AFR-1R 1929/1 (REP)	250			
7-16	7-22						1			545-7A	3	100	1	7-20	FR	30	655A		HES-850A	100			

MONTHLY COST CONFIRMATION

520.00

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

Leah S. Chumney, Bus. Mgr.
Kathy Sherer

Communication Expires 11-20-88

ORIGINAL COPY

ACTUAL GROSS BILLING	520.00	SUB-TOTAL
AGENCY COMMISSION	78.00	TOTAL RECONCILING ITEMS
NET DUE AMOUNT	442.00	

86030504422

VOICE/AFFIDAVIT COPY 2
 AGENCY: JEFFERSON MARKETING
 P.O. BOX 17907
 RALEIGH, NC

WXII12

WXII-TV 07/31/84 PAGE: 1

27617
 PERMIT: WXII-TV
 PO BOX 11847
 WINSTON-SALEM, NC
 27106

REPRESENTATIVE	SALESMAN
ADVERTISER	MANNING, ZACK
HELMS FOR SENATE COMM.	HELMS SENATE COMM.

ORDER TYPE	AGENCY ESTIMATE NO.
REVISION-03	
CONTRACT NUMBER	BROADCAST MONTH
INVT 0981-01	6/25-07/29/84
SCHEDULE DATES	BILLING PERIOD
7/20-08/01/84	STANDARD

SCHEDULE						ACTUAL BROADCAST						RECONCILIATION						
TU	W	TH	F	SA	SU	TIME	RATE	NO.	DATES	DAY	TIME	TYPE MIN SEC	M/G FOR	PRODUCT/FILM	RATE	DEBIT	CREDIT	REMARKS
				X		655AM-0715AM	50.00	1	7/20	FR	716A	30		APP-1 OF REGAM	50.00	✓ 2623		
X	X	X				730AM-0820AM	50.00	1	7/23	MO	822A	30		APP-1RV	50.00			2905
									7/24	TU	815A	30		APP-1 RV	50.00			
									7/25	WE	745A	30		APP-1 RV	50.00			
									7/26	TH	826A	30		APP-1 RV	50.00			
				X		M-F 1130-1230A	100.00	1	7/20	FR	1137P	30		APP-1 OF REGAM	100.00	✓ 2623		
X	X	X				M-F 1130-1230A	100.00	1	7/23	MO	1207A	30		APP-1RV	100.00			2905
									7/24	TU	1232A	30		APP-1 RV	100.00			
									7/25	TH	1224A	30		APP-1 RV	100.00			
									7/25	WE								
				X		BSBL PRIME	500.00	1	7/25	WE	1200A	30		APP-1 RV	500.00			
						930PM-1130PM	900.00	1	7/22	SU	1125P	30		APP-1RV	900.00	✓ 2623		

OFFICIAL SEAL
 ELAINE SHANKS
 NOTARY PUBLIC-NORTH CAROLINA
 COUNTY OF FORSYTH
 My Commission Expires November 6, 1985
Elaine Shanks

SCHEDULE COST FOR THIS BILLING PERIOD	ACTUAL GROSS BILLING	AGENCY COMMISSION	NET DUE	SUB-TOTALS	RECONCILIATION
---------------------------------------	----------------------	-------------------	---------	------------	----------------

2,150.00 2,205.00 407.50 1,742.50 100.00 100.00
 WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG

INVOICE/AFFIDAVIT-COPY 2
 AGENCY: JEFFERSON MARKETING
 P.O. BOX 17807
 RALEIGH, NC

WXII12

WXII-TV 08/29/84 PAGE: 1

27617
 REMIT: WXII-TV
 PO BOX 11847
 WINSTON-SALEM, NC
 27106

REPRESENTATIVE	SALESMAN
	MANNING, ZACK
ADVERTISER	PRODUCT
HELMS FOR SENATE COMM.	HELMS SEN/NATL CONG CL.

ORDER TYPE	AGENCY ESTIMATE NO.
REVISION-04	
CONTRACT NUMBER	BROADCAST MONTH
INV# 0981-02	7/30-08/26/84
SCHEDULE DATES	BILLING PERIOD
7/20-08/01/84	STANDARD

SCHEDULE					ACTUAL BROADCAST							RECONCILIATION							
TU	W	TH	F	SA	SU	TIME	RATE	NO.	DATES	DAY	TIME	TYPE MM	SEC	M/G FOR	PRODUCT/FILM	RATE	DEBIT	CREDIT	REMARKS
						1128PM-1130PM	100.00	1	8/01	WE	1129P	30		7/25	AFF-1 RV	100.00	100.00		
SCHEDULE COST FOR THIS BILLING PERIOD					ACTUAL GROSS BILLING			AGENCY COMMISSION			NET DUE		SUB-TOTALS		RECONCILIATION				
					4 2100.00			0 5 012.00			9 8 35.00		100.00		100.00				

2905
 ?!

OFFICIAL SEAL
 ELAINE SHANKS
 NOTARY PUBLIC-NORTH CAROLINA
 COUNTY OF FORSTH
 My Commission Expires November 6, 1985
Elaine Shanks

WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG

VOICE/AFFIDAVIT COPY 2

AGENCY: JEFFERSON MARKETING
 P.O. BOX 17807
 KALEIGH, NC

WXII12

WXII-TV	ORDER TYPE 07/31/86	PAGE NO. 2
REVISION 02	CONTRACT NUMBER	BROADCAST MONTH
INV: 1145-01	SCHEDULE DATES	BILLING PERIOD
7/21-07/27/86		STANDARD

REPRESENTATIVE	SALESMAN
ADVERTISER	MANNING, ZACK PRODUCT
HELMS FOR SENATE COMM. HELMS SEN/NATL CONG CA	

REMIT: WXII-TV
 PO BOX 11847
 WINSTON-SALEM, NC

27617

27135

SCHEDULE					ACTUAL BROADCAST							RECONCILIATION							
TU	W	TH	F	SA	SU	TIME	RATE	NO.	DATES	DAY	TIME	TYPE MIN	SEC	M/G FOR	PRODUCT/FILM	RATE	DEBIT	CREDIT	REMARKS
				X		1000PM-0300PM	300.00	1	7/21	SA	207P	30			AFR-1 RV	300.00	✓1895		
				X		M-SU 11-1130P	225.00	1	7/21	SA	1129P	30			AFR-1 RV	225.00	✓1895		
				X		12:30-1:00 PM	100.00	1	7/22	SU	1229P	30			AFR-1RV	100.00	✓1895		
				X		200PM-0600PM	200.00	1	7/22	SU									200.00 SPORTS
				X		628PM-0630PM	150.00	1	7/22	SU	717P	30	7/22		AFR-1RV	200.00	✓200.00	895	
				X		300PM-0600PM	300.00	1	7/21	SA	318P	30			AFR-1 RV	150.00	✓1895		
				X		1128PM-1130PM	300.00	1	7/21	SA	318P	30			AFR-1 RV	300.00	✓1895		
				X		1128PM-1130PM	225.00	1	7/22	SU	1158P	30			AFR-1RV	225.00	✓1895		

OFFICIAL SEAL
 ELAINE SHANKS
 NOTARY PUBLIC-NORTH CAROLINA
 COUNTY OF FORSTH
 My Commission Expires November 6, 1985

Elaine Shanks

SCHEDULE COST FOR THIS BILLING PERIOD ACTUAL GROSS BILLING AGENCY COMMISSION NET DUE SUB-TOTALS RECONCILIATION

1,500.00 5 2,400.00 5 0 225.00 9 8 1,275.00 200.00 200.00

WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE BROADCAST LOG

VOICE/AFFIDAVIT-COPY 2

AGENCY: JEFFERSON MARKETING
 P.O. BOX 19807
 RALEIGH, NC

WXII12

WXII-TV ORDER TYPE 07/31/84 AGENCY ESTIMATE NO. 1

REMIT: WXII-TV 27610
 PO BOX 11847
 WINSTON-SALEM, NC
 27106

REPRESENTATIVE	SALESMAN
ADVERTISER	PRODUCT
REP. SENATE COMMITTEE	MANNING, ZACK
	HELMS, SEN. NAT'L CON. CH

REVISION-02	BROADCAST MONTH
CONTRACT NUMBER	6/25-07/29/84
INV# 1093-01	BILLING PERIOD
SCHEDULE DATES	7/23-08/01/84
	STANDARD

SCHEDULE						ACTUAL BROADCAST							RECONCILIATION						
TU	W	TH	F	SA	SU	TIME	RATE	NO.	DATES	DAY	TIME	TYPE MIN SEC	M/G FOR	PRODUCT/FILM	RATE	DEBIT	CREDIT	REMARKS	
X	X	X	X	A		7-5AM-0820AM	50.00	5	7/23	MO	820A	30		AFR-1 RV	50.00	} 3045			
									7/24	TU	722A	30		AFR-1 RV	50.00				
									7/25	WE	822A	30		AFR-1 RV	50.00				
									7/26	TH	813A	30		AFR-1 RV	50.00				
									7/27	FR	828A	30		AFR-1 RV	50.00				
			X	X		525PM-0630PM	350.00	2	7/26	TH	628P	30		AFR-1 RV	350.00	} 3045			
									7/27	FR	628P	30		AFR-1 RV	350.00				
			X	A		1123PM-1130PM	225.00	2	7/26	TH	1129P	30		AFR-1 RV	225.00	- 3045			
									7/27	FR								225.00 NO AVIL	
SCHEDULE COST FOR THIS BILLING PERIOD						1,400.00	ACTUAL GROSS BILLING		9 2 6 2 6		AGENCY COMMISSION		8 6 0 3 0 5		NET DUE		SUB-TOTALS		RECONCILIATION

OFFICIAL SEAL
 ELAINE SHANKS
 NOTARY PUBLIC-NORTH CAROLINA
 COUNTY OF FORSYTH
 My Commission Expires November 6, 1985
Elaine Shanks

AGENCY: JEFFERSON MARKETING
 P.O. BOX 19607
 RALEIGH, NC

WXII12

WXII-TV 06/29/94 PAGE 1

REMIT: WXII-TV 27619
 PO BOX 11847
 WINSTON-SALEM, NC
 27106

REPRESENTATIVE	SALESMAN
	MANNING, ZACK
ADVERTISER	PRODUCT
REP. SENATE COMMITTEE	HELMS SEN/NAT'L CNG CB

ORDER TYPE	AGENCY ESTIMATE
REVISION-02	
CONTRACT NUMBER	BROADCAST MONTH
INV# 1093-02	7/30-08/26/
SCHEDULE DATES	BILLING PERIOD
7/23-08/01/94	STANDARD

SCHEDULE					ACTUAL BROADCAST							RECONCILIATION					
M	TU	W	TH	F SA SU	TIME	RATE	NO.	DATES	DAY	TIME	TYPE MIN SEC	M/G FOR	PRODUCT/FILM	RATE	DEBIT	CREDIT	REMA
X					558PM-0600PM	225.00	1	8/01	WE	558P		30	7/27	AFR-1 RV	225.00	225.00	
																3046	

OFFICIAL SEAL
 ELAINE SHANKS
 NOTARY PUBLIC-NORTH CAROLINA
 COUNTY OF FORSYTH
 My Commission Expires November 6, 1995
Elaine Shanks

COPY

SCHEDULE COST FOR THIS BILLING PERIOD	ACTUAL GROSS BILLING	AGENCY COMMISSION	NET DUE	SUB-TOTALS	RECONC
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8 6 0 3 0 4 4 2 7
 225.00
 30.75
 194.25
 225.00



A TVX STATION 3500 Myer Lee Dr, Winston-Salem, NC 27101 919-722-4545

CLIENT COPY

AGENCY BILLING ADDRESS
 JEFFERSON MARKETING
 PO BOX 19807
 RALEIGH NC 27619

NAME: WNRW-TV
 3500 MYER-LEE
 PAYMENT WINSTON-SALEM, NC 27101

WNRW DATE 07/29/84

REPRESENTATIVE	SALESMAN
ADVERTISER	PRODUCT
TONY HOLLOWAY	HELMS
HELMS FOR SENATE COM 1239	

ORDER TYPE	5	AGENCY EST. NO.
INVOICE NO.	PAGE	BROADCAST MONTH
1146-003096	1	JULY, 1984
SCHEDULE DATES	CONTRACT YEAR	
07/10/84-07/29/84		
BILLING INSTRUCTIONS		

LINE#	DAY	TIME	SPOTS	START	END	PRODUCT	RATE	REMARKS
T-F LINE# 1	7/12	TH 726P	30			HFS-811 HELMS FOR SENATE	7000	
	7/12	TH 756P	30			HFS-811 HELMS FOR SENATE	7000	
	7/13	F 713P	30			HFS-811 HELMS FOR SENATE	7000	
	7/17	T 732P	30			HFS-850-A CENTRAL AMERICA	7000	
	7/18	W 743P	30			HFS-850-A CENTRAL AMERICA	7000	
	7/20	F 715P	30			AFR-1 R	7000	2905
	7/24	T 701P	30			HFS-850 A CENTRAL AMERICA	7000	
	7/26	TH 721P	30			HFS-850 A CENTRAL AMERICA	7000	
	7/27	F 748P	30			HFS-850 A CENTRAL AMERICA	7000	
SU LINE# 2	7/15	SU 351P	30			HFS-811 HELMS FOR SENATE	7000	
	7/22	SU 536P	30			AFR-TR DEFENDING REAGAN	7000	2905
LINE# 3	7/29	SU 516P	30			HFS-850 A CENTRAL AMERICA	7000	
	7/18	W 838P	30			HFS-850-A CENTRAL AMERICA	40000	
LINE# 4	7/19	TH 810P	30			HFS-850-A CENTRAL AMERICA	40000	

MONTHLY COST PER ORDER CONFIRMATION	164000	ACTUAL GROSS BILLING	164000	SUB-TOTALS
WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG.		AGENCY COMMISSION	24600	TOTAL RECONCILING ITEMS
		NET DUE	139400	

8 2 7 0 5 0 2 0 9 8

AGENCY BILLING ADDRESS
 JEFFERS MARKETING INC.
 P O BOX 1907
 RALEIGH NC 27610

JOURNAL LIFE BROADCASTING, INC.
 P O BOX 1511
 RALEIGH, NORTH CAROLINA 27602

LPTF-TV
 CHANNEL 28
 910-832-8311

INVOICE NUMBER	DATE	PAGE
57732101	7-31-84	1
RATE CARD	BROADCAST MONTH	AGENCY
17	JULY	YES

MAKE PAYMENT TO
 LPTF-TV
 JOURNAL LIFE BROADCASTING, INC.
 P O BOX 1511
 RALEIGH NC 27602

REPRESENTATIVE	PRODUCT	CONTRACT END DATE
LOCAL	LPL POLITICAL	7-27-84
ADVERTISER	SALESPERSON NUMBER	CONTRACT NUMBER
RELMS FOR SENATE	RBU 0006	577321
		CUSTOMER NUMBER
		700675

SCHEDULE				ACTUAL BROADCAST								RECONCILIATION	
DATE	TIME	SPOTS	SECS	DATE	DAY	TIME	SPOTS	SECS	PROGRAM	COPY NUMBER/DESCRIPTION	AMOUNT	MARKS	CHG
7-23	7-27	1 1 1 1 1		7-23	MO	30	15		758A	AFR-1	15	3045	
				7-24	TU	30			724A	AFR-1	15		
				7-25	WE	30			710A	AFR-1	15		
				7-26	TH	30			759A	AFR-1	15		
				7-27	FR	30	5		710A	AFR-1	15		

PRE-PAID

MONTHLY COST CONFIRMATION	75.00	ACTUAL GROSS BILLING	75.00	SUB-TOTAL
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.	AGENCY COMMISSION	11.25
		ORIGINAL COPY	NET DUE AMOUNT	63.75
			TOTAL RECONCILING ITEMS	

86030504429

AGENCY BILLING ADDRESS

JEFFERSON MARKETING INC.
 P. O. BOX 19007
 RALEIGH, N.C. 27619

DURHAM LIFE BROADCASTING, INC.
 P. O. BOX 1511
 RALEIGH, NORTH CAROLINA 27602

WCTM-TV
 CHANNEL 28
 934-832-8311

INVOICE NUMBER	DATE	PAGE
67733101	7-31-84	1

RATE CARD	BROADCAST MONTH	AGENCY
17	JULY	YES

MAKE PAYMENT TO

WCTM-TV
 DURHAM LIFE BROADCASTING, INC.
 P. O. BOX 1511
 RALEIGH, N.C. 27602

REPRESENTATIVE	PRODUCT	CONTRACT END DATE
LUCAL	LPL POLITICAL	7-22-84
ADVERTISER	SALESPERSON NUMBER	CONTRACT NUMBER
HELMES FOR SENATE	RBU 0006	677331
		CUSTOMER NUMBER
		760670

SCHEDULE		ACTUAL BROADCAST										RECONCILIATION				
START DATE	END DATE	SPOTS	TIME	DAY	DATE	NO.	DATE	DAY	LENGTH	TIME	NO. FOR	AGENCY COPY NUMBER	DESCRIPTION	AMOUNT	MARK	DRY
7-16	7-22	2		OWENS		35	7-22	SU	30	202P			4FR-IR	35		
						2	7-22	SU	30	417P			4FR-IR	35		

PRE-PAID

71895

MONTHLY COST CONFIRMATION

70.00

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	70.00	SUB-TOTAL
AGENCY COMMISSION	1.50	TOTAL RECONCILING ITEMS
NET DUE AMOUNT	59.50	

85030504430

AGENCY BILLING ADDRESS

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N.C. 27619

DURHAM LIFE BROADCASTING, INC.
P.O. BOX 1511
RALEIGH, NORTH CAROLINA 27602

PTF-TV
CHANNEL 28
919-832-8311

INVOICE NUMBER	DATE	PAGE
67729701	7-31-64	2
RATE CARD	BROADCAST MONTH	AGENCY
17	JUL	YES

MAKE PAYMENT TO

WPTF-TV
DURHAM LIFE BROADCASTING, INC.
P.O. BOX 1511
RALEIGH, N.C. 27602

REPRESENTATIVE	PRODUCT	CONTRACT END DATE
LOCAL	LPL POLITICAL	8-12-64
ADVERTISER	SALESPERSON NUMBER	CONTRACT NUMBER
HELMS FOR SENATE	PHO 0006	677297
		CUSTOMER NUMBER
		700076

SCHEDULE										ACTUAL BROADCAST										CONCILIATION	
LINE	START	END	SPOTS	SPOTS	SPOTS	SPOTS	RATE	NO.	DATE	DAY	LENGTH	TIME	STATION	DESCRIPTION	AMOUNT	MARKS	DISC.				
7-16	8-12	1	1	1	1	1	15	30	7-26	TH	30	959A	HFS-850-A	V-60	15						
									7-26	TH	30	1254P	HFS-850-A	V-60	15						
									7-26	TH	30	229P	HFS-850-A	V-60	15						
									7-27	FR	30	1059A	HFS-850-A	V-60	15						
									7-27	FR	30	1229P	HFS-850-A	V-60	15						
									7-27	FR	30	1258P	HFS-850-A	V-60	15						
									7-16	MO	30	1219A	HFS-850-A	V-60	15						
									7-17	TU	30	1215A	HFS-850-A	V-60	15						
									7-18	WE	30	1205A	HFS-850-A	V-60	15						
									7-19	TH	30	1215A	HFS-850-A	V-60	15						
									7-20	FR	30	1145P	HFS-850-A	V-60	15						
									7-23	MO	30	1225A	HFS-850-A	V-60	15						
									7-24	TU	30	1255A	HFS-850-A	V-60	15						
									7-25	WE	30	1155P	HFS-850-A	V-60	15						
									7-26	TH	30	1215A	HFS-850-A	V-60	15						
7-16	8-12	1	1	1	1	1	10	1	7-27	FR	30	1150P	HFS-850-A	V-60	15						
									7-18	WE	30	503A	HFS-850-A	V-60	15						
									7-19	TH	30	632A	HFS-850-A	V-60	10						
									7-22	FR	30	653A	HFS-850-A	V-645P	10						
									7-23	MO	30	632A	HFS-850-A	V-60	10						
									7-25	TU	30	654A	HFS-850-A	V-60	10						
									7-27	FR	30	652A	HFS-850-A	V-60	10						

Bob missed "Shogun" spot
5/1 7/22 9 11:30p 450

PRE-PAID

MONTHLY COST CONFIRMATION	660.00	ACTUAL GROSS BILLING	630.00	SUB-TOTAL	630.00
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.	AGENCY COMMISSION	94.50	TOTAL RECONCILING ITEMS	0.00
	ORIGINAL COPY	NET DUE AMOUNT	535.50		

86030504431

AGENCY BILLING ADDRESS

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH N.C. 27619

DURHAM LIFE BROADCASTING, INC.
P. O. BOX 1511
RALEIGH, NORTH CAROLINA 27602

WPTF-TV
CHANNEL 28
919-832-8311

INVOICE NUMBER	DATE	PAGE
67729701	7-31-84	1
RATE CARD	BROADCAST MONTH	AGENCY
17	LY	YES

MAKE PAYMENT TO

WPTF-TV
DURHAM LIFE BROADCASTING, INC.
P. O. BOX 1511
RALEIGH N.C. 27602

REPRESENTATIVE	PRODUCT	CONTRACT END DATE
LOCAL	LPL POLITICAL	8-12-84
ADVERTISER	SALESPERSON NUMBER	CONTRACT NUMBER
HELMS FOR SENATE	RBU 0006	677297
		CUSTOMER NUMBER
		700676

SCHEDULE			ACTUAL BROADCAST										RECONCILIATION	
START DATE	END DATE	SPOTS	TIME	LENGTH	TIME	MSG FOR	SPOTS	COPY NUMBER	DESCRIPTION	AMOUNT	REMARKS	DR/CR		
7-16	8-12	3 3 3 3 3	10A-3P		15									
				7-16	MO	30	1058A		HFS-850-A	v-60	15			
				7-16	MO	30	1128A		HFS-850-A	v-60	15			
				7-16	MO	30	228P		HFS-850-A	v-60	15			
				7-17	TU	30	1058A		HFS-850-A	v-60	15			
				7-17	TU	30	1259P		HFS-850-A	v-60	15			
				7-17	TU	30	129P		HFS-850-A	v-60	15			
				7-18	WE	30	958A		HFS-850-A	v-60	15			
				7-18	WE	30	1058A		HFS-850-A	v-60	15			
				7-18	WE	30	1229P		HFS-850-A	v-60	15			
				7-19	TH	30	958A		HFS-850-A	v-60	15			
				7-19	TH	30	1058A		HFS-850-A	v-60	15			
				7-19	TH	30	229P		HFS-850-A	v-60	15			
				7-20	FR	30	1058A		AFR-1 v-6458		15			
				7-20	FR	30	1228P		AFR-1 v-6458		15			
				7-20	FR	30	1259P		AFR-1 v-6458		15			
				7-23		30	1028A		HFS-850-A	v-60	15			
				7-23		30	1058A		HFS-850-A	v-60	15			
				7-23		30	129P		HFS-850-A	v-60	15			
				7-24	TU	30	1028A		HFS-850-A	v-60	15			
				7-24	TU	30	1058A		HFS-850-A	v-60	15			
				7-24	TU	30	1229P		HFS-850-A	v-60	15			
				7-25	WE	30	958A		HFS-850-A	v-60	15			
				7-25	WE	30	1058A		HFS-850-A	v-60	15			
				7-25	WE	30	129P		HFS-850-A	v-60	15			

CONTINUED NEXT PAGE

72905

MONTHLY COST CONFIRMATION

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	SUB-TOTAL
AGENCY COMMISSION	TOTAL RECONCILING ITEMS
NET DUE AMOUNT	

86030504432

AGENCY BILLING ADDRESS

JEFFERS MARKETING INC.
P. O. BOX 1511
RALEIGH, N.C. 27619

DURHAM LIFE BROADCASTING, INC.
P. O. BOX 1511
RALEIGH, NORTH CAROLINA 27612

WTF-TV
CHANNEL 28
(919) 32-8311

INVOICE NUMBER	DATE	PAGE
67729801	7-31-84	1
RATE CARD	BROADCAST MONTH	AGENCY
1	JUL	YES

MAKE PAYMENT TO

WTF-TV
DURHAM LIFE BROADCASTING, INC.
P. O. BOX 1511
RALEIGH, N.C. 27602

ok

REPRESENTATIVE	PRODUCT	CONTRACT END DATE
LOCAL	POLITICAL	7-26-84
ADVERTISER	SALESPERSON NUMBER	CONTRACT NUMBER
HELP FOR SENATE	RFU 006	677298
		CUSTOMER NUMBER
		760075

SCHEDULE										ACTUAL BROADCAST										RECONCILIATION	
START DATE	END DATE	MTWTFSS	SPOTS	TIME PERIOD	PLAN	RATE	NO.	DATE	DAY	LENGTH	TIME	M/G FOR	AGENCY	NUMBER/DESCRIPTION	AMOUNT	REMARKS	DR/CR				
7-13	7-19	1 1 1 1 1		7-9A		15		7-13	FR	30	759A		HFS-811	v-65	15						
								7-16	TH	30	820A		HFS-850-A	v-60	15						
								7-17	TH	30	710A		HFS-850-A	v-60	15						
								7-18	FR	30	821A		HFS-850-A	v-60	15						
							5	7-19	TH	30	759A		HFS-850-A	v-60	15						
7-13	7-19	1 1 1 1 1		1130-1230A		15		7-13	FR	30	1215A		HFS-811	v-65	15						
								7-16	TH	30	1208A		HFS-850-A	v-60	15						
								7-17	TH	30	1252A		HFS-850-A	v-60	15						
								7-19	FR	30	1215A		HFS-850-A	v-60	15						
							5	7-19	TH	30	1135P		HFS-850-A	v-60	15						
7-13	7-19	1 1 1 1 1		730-8P		125		7-16	TH	30	732P		HFS-850-A	v-60	125						
							2	7-14	FR	30	732P		HFS-850-A	v-60	125						
7-13	7-19	1 1 1 1 1	1	VARIOUS		125	1	7-14	SA	30	258P		HFS-811	v-65	125						
7-13	7-19	1 1 1 1 1	1	SPOTS ORLD		50	1	7-15	SU	30	547P		HFS-811	v-65	50						
7-2	7-26	1 1 1 1 1		7-9A		15		7-20	FR	30	110A		HFS-811	v-6453	15	2623					
								7-23	TH	30	844A		HFS-850-A	v-60	15						
								7-24	TH	30	711A		HFS-850-A	v-60	15						
								7-25	FR	30	920A		HFS-850-A	v-60	15						
							5	7-26	TH	30	821A		HFS-850-A	v-60	15						
7-20	7-26	1 1 1 1 1		1130-1230A		15		7-20	FR	30	1205A		HFS-811	v-60	15	2623					
								7-23	TH	30	1229A		HFS-850-A	v-60	15						
								7-24	TH	30	1225A		HFS-850-A	v-60	15						
								7-25	FR	30	1215A		HFS-850-A	v-60	15						
							5	7-26	TH	30	1135P		HFS-850-A	v-60	15						

CONTINUED NEXT PAGE

MONTHLY COST CONFIRMATION

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	SUB-TOTAL
AGENCY COMMISSION	TOTAL RECONCILING ITEMS
NET DUE AMOUNT	

8693504433

WTVD

WTVD-TV
 P.O. BOX 2000
 DURHAM, NC 27702

WOMEN

DATE **AUG 02 1984** 2229 L

REPRESENTATIVE	SALESMAN
FCA	J. PEARCY
ADVERTISER	PRODUCT
ELMS SEN	HELMS REP CAND
CONGRESSIONAL CL	US SENATE

AGENCY: JEFFERSON MARKETING
 P.O. BOX 19807
 BILLING ADDRESS: RALEIGH, NC 27619
 ATTN: LYNDA HAWLEY

INVOICE NO. 4765	PAGE 1	OF 1	CONTRACT NO. 005180
SCHEDULE DATES 07/20/84 - 07/20/84		BROADCAST MONTH JULY 1984	
BILLING INSTRUCTIONS			

SCHEDULE				ACTUAL BROADCAST								RECONCILIATION	
2 TIME	3 RATE	4 No. This Month	5 DATES	6 DAY	7 TIME	8 TYPE	9 M/G For	10 PRODUCT/FILM NO.	11 RATE	12 REMARKS	13 DR.	14 CR.	
9a-12p	140	1	7/20	7	1059a	30		AFB 1 REV	140	2405			
1230-4p	280	1	7/20	7	329P	30		AFB 1 REV	280	2905			
12-1230p	240	1	7/20	7	1158a	30		AFB 1 REV	240	2405			



SWORN AND SUBSCRIBED BEFORE ME THIS DAY OF 7-19-84
 NOTARY PUBLIC IN AND FOR THE STATE OF NORTH CAROLINA
 My Commission Expires May 1, 1989

MONTHLY COST CONFIRMATION 15	660.00	ACTUAL GROSS BILLING 18	660.00	SUB TOTALS 21	—
MINUS CONCILING ITEMS 16	—	AGENCY COMMISSION 19	99.00	TOTAL RECONCILING ITEMS TO LINE 17 22	—
NET DUE WTVD 17	660.00	NET DUE WTVD 20	561.00	NET DUE 23	561.00

WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG.

OK

WTVD

WTVD-TV
 P.O. BOX 2000
 DURHAM, NC 27702

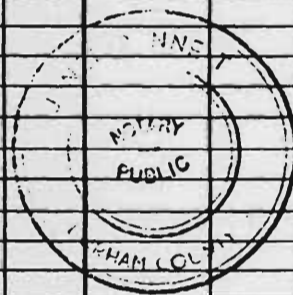
DATE **AUG 02 1984** 2229 L

PRESENTATIVE I-GA	SALESMAN J. PEARCY
ADVERTISER HELMS GEN PROFESSIONAL CL	PRODUCT HELMS REP (CA'D) US SENATE

AGENCY: JEFFERSON MARKETING
 P.O. BOX 14807
 BILLING RALEIGH, NC 27610
 ADDRESS: ATTN: LYNDA HAWLEY

INVOICE NO. 4764	PAGE 1	OF 1	CONTRACT NO. 005185
SCHEDULE DATES 07/23/84 - 07/27/84		BROADCAST MONTH JULY 1984	
BILLING INSTRUCTIONS			

SCHEDULE				ACTUAL BROADCAST							RECONCILIATION		
2 TIME	3 RATE	4 No. This Month	5 DATES	6 DAY	7 TIME	8 TYPE	9 M/G For	10 PRODUCT/FILM NO.	11 RATE	12 REMARKS	13 DR.	14 CR.	
-P 7-9a	50	5	7/23	m	824a	30		AFB 1 Rev	50	w/of 7/23			
			24	w	823a			/	50				
			25	w	724a			/	50	3045			
			26	th	819a			/	50				
			27	f	759a			/	50				
-Tu 12-1230p	240	2	7/23	m	1227P	30		AFB 1 Rev	240	3045			
			7/24	w	1158P			AFB 1 Rev	240				
-F 6-7p	650	3	7/25	w	559P	30		AFB 1 Rev	650				
			7/26	th	659P	30		AFB 1 Rev	650	3045			
			7/27	f	559P	30		AFB 1 Rev	650				
1-F 11-1130p	650	2	7/26	th	1127P	30		AFB 1 Rev	650				
			7/27	f	1128P	30		AFB 1 Rev	650				



SWORN AND SUBSCRIBED BEFORE ME THIS DAY OF AUG 1984
 NOTARY PUBLIC IN AND FOR THE STATE OF NORTH CAROLINA
 My Commission Expires May 1, 1989

MONTHLY COST CONFIRMATION	15	3980.00	ACTUAL GROSS BILLING	18	3980.00	SUB TOTALS	21	—
MINUS RECONCILING ITEMS	16	—	AGENCY COMMISSION	19	597.00	TOTAL RECONCILING ITEMS TO LINE 17	22	—
NET BILLING	17	3980.00	NET DUE WTVD	20	3383.00	NET DUE	23	3383.00

WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG.

ok

WTVD

WTVD-TV
 P.O. BOX 2009
 DURHAM, NC 27702

DATE **AUG 02 1984** 2229 L

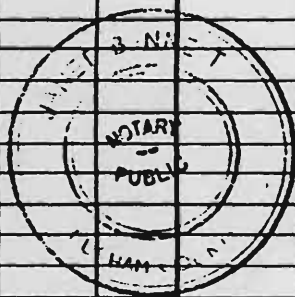
PRESENTATIVE FCA	SALESMAN J. PEARCY
ADVERTISER HELMS REP CONGRESSIONAL CL	PRODUCT HELMS REP CAMD US SENATE

AGENCY: JEFFERSON MARKETING
 P.O. BOX 19807

BILLING RALEIGH, NC 27619
 ADDRESS: ATTN: LYNDA HAWLEY

INVOICE NO. 4766	PAGE 1	OF 1	CONTRACT NO. 005181
SCHEDULE DATES 07/22/84 - 07/29/84		BROADCAST MONTH JULY 1984	
BILLING INSTRUCTIONS			

SCHEDULE				ACTUAL BROADCAST							RECONCILIATION		
2 TIME	3 RATE	4 No. This Month	5 DATES	6 DAY	7 TIME	8 TYPE	9 M/G For	10 PRODUCT/FILM NO.	11 RATE	12 REMARKS	13 DR.	14 CR.	
7-8p	400	1	7/28	Sa	756P	30		AFB1 REV	400	1895			
9-1030a	250	1	7/29			30						250	
11-1130p	650	1	7/22	Su	1119P	30		AFB 1 REV	650	1895			
1230-2p	140	1	7/22	Su	132P	30		AFB 1 REV	140	1895			



SHOWN AND SIGNED BEFORE ME THIS DAY OF JULY 1984
 NOTARY PUBLIC IN AND FOR THE STATE OF NORTH CAROLINA
 My Commission Expires May 1, 1989

MONTHLY COST CONFIRMATION ¹⁵	1440.00	ACTUAL GROSS BILLING ¹⁸	1190.00	SUB TOTALS ²¹	— (250)
MINUS CONCILING ITEMS ¹⁶	(250.00)	AGENCY COMMISSION ¹⁹	178.50	TOTAL RECONCILING ITEMS TO LINE 17 ²²	(250.00)
NET DUE WTVD ¹⁷	1190.00	NET DUE WTVD ²⁰	1011.50	NET DUE ²³	1011.50

WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG.

OK

AGENCY BILLING ADDRESS
 JEFFERSON MARKETING
 POST OFFICE BOX 19807
 RALEIGH NC 27619

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WLFL-TV 22
 P.O. BOX 15366 • DURHAM, NORTH CAROLINA 27704 • (919) 471-4461

INVOICE NUMBER: 54103001
 DATE: 7-31-84

DATE ORDERED: 22
 BROADCAST MONTH: JULY
 AGENCY: YES

MAKE PAYMENT TO
 WLFL-TV
 2410 BROAD STREET
 P.O. BOX 15366
 DURHAM NC 27704

REPRESENTATIVE: LOCAL
 PRODUCT: POLITICAL

CONTRACT END DATE: 7-27-84

ADVERTISER: HILLARY FOR SENATE
 SALES PERSON NUMBER: 4154

CONTRACT NUMBER: 541030
 CUSTOMER NUMBER: 450111

SCHEDULE				ACTUAL BROADCAST										RECONCILIATION				
START DATE	END DATE	LINE	SPOTS	SEC	TIME PERIOD	PLAN	SPOTS	NO.	DATE	DAY	LENGTH	TIME	SPOTS	AGENCY CONTRACT NUMBER	DESCRIPTION	AMOUNT	REMARKS	PRICE
7-22	7-22				5-7P	1		1	7-22	SU	30	631P		OFF AIR			MISSET	
7-21	7-21				1-2P	1		1	7-21	SA	30	157P		OFF AIR			MISSET	
7-29	7-29				5-7P	1		1	7-29	SU	30	535P		HILLARY			MAKEGOOD	



[Handwritten signature]
 My Commission Expires October 7, 1989

MONTHLY COST CONFIRMATION: 160.00
PLEASE NOTE: Accounts payable in full upon receipt of invoice.
 We warrant that the actual broadcast information shown on this invoice was taken from the program log.
 ACCOUNTING

ACTUAL GROSS BILLING	SUB-TOTAL
AGENCY COMMISSION	TOTAL RECONCILING ITEMS
NET DUE AMOUNT	

33730301138

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

WNCT-TV 9 
 Roy H. Park Broadcasting, Inc.
 P.O. Box 898 Greenville, N.C. 27834 (919) 756-3180

27834

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

27619

REGIONAL	PERETIC, BOB/REGIONAL
HELMS FOR SENATE	HELMS FOR SENATE/YB PL

REVISION-01	
INV# 8128-03	6/25-07/29/84
7/13-07/26/84	STANDARD

TERMS: DUE AND PAYABLE UPON RECEIPT OF INVOICE

LN	W	TH	F	SA	SU	TIME	RATE	SEC	DATE	DAY	SPOTS	CLASS	START	END	PRICE	ADJ	INT
			X			M-F 8-10 AM	40.00	1	7/13	FR	30	HFSB11			40.00		
				X		SAT 430-6PM	85.00	2	7/14	SA						85.00	INT ADJ
									7/21	SA	30	HESB11			85.00	85.00	INT ADJ
									7/14	SA	30	518P	7/14		85.00		
									7/21	SA	30	559P	7/21		85.00		
	X	X	X	X		M-F 8-10 AM	40.00	5	7/16	MO	30	HFSB50A			40.00		
									7/17	TU	30	HFSB50A			40.00		
									7/18	WE	30	HFSB50A			40.00		
									7/19	TH	30	HFSB50A			40.00		
									7/20	FR	30	AFR#1			40.00		
	X	X	X			M-F 8-10 AM	40.00	4	7/23	MO	30	HFSB50			40.00		
									7/24	TU	30	HFSB50			40.00		
									7/25	WE	30	HFSB50			40.00		
									7/26	TH	30	HFSB50			40.00		

PAYMENT DUE WITHIN 10 DAYS OF RECEIPT OF INVOICE

INVOICE / AFFIDAVIT

Lorie Boyd

My Commission Expires May 14, 1988

SCHEDULE COST FOR THE BILLING PERIOD	570.00	6	2	\$70.00	5	0	85.50	9	8	484.50	170.00	170.00
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PLEASE RETURN COPY WITH YOUR REMITTANCE

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

27834

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

27619

CLIENT 1

WNCT-TV 9 
 Roy H. Park Broadcasting, Inc.
 P.O. Box 898 Greenville, N.C. 27834 (919) 756-3180

WNCT-TV 07/26/84 PAGE: 1

REGIONAL	PERETIC, BOB/REGIONAL
ADVERTISER	PROGRAM
HELMS FOR SENATE	HELMS FOR SENATE/WM. #1

ORIGINAL	
INV# 8112-02	THRU 07/25/84
7/16-07/20/84	STANDARD

TERMS: DUE AND PAYABLE UPON RECEIPT OF INVOICE

LN	SP	TH	FR	SA	SU	SCHEDULE	RATE	NO.	DATE	DAY	TIME	SECS	LINE	SP	PRICE	TOTL
X	X	X				M-F 6-7AM	45.00	5	7/16	MO	633A	30		HFS850A	45.00	
									7/17	TU	611A	30		HFS850A	45.00	
									7/18	WE	616A	30		HFS850A	45.00	
									7/19	TH	559A	30		HFS850A	45.00	
									7/20	FR	647A	30		AERA1	45.00	2905
X	X	X	X			M-F 7-8 AM	50.00	5	7/16	MO	659A	30		HFS850A	50.00	
									7/17	TU	756A	30		HFS850A	50.00	
									7/18	WE	717A	30		HFS850A	50.00	
									7/19	TH	737A	30		HFS850A	50.00	
									7/20	FR	751A	30		AERA1	50.00	2905
X	X	X	X			900AM-1000AM	35.00	5	7/16	MO	906A	30		HFS850A	35.00	
									7/17	TU	759A	30		HFS850A	35.00	
									7/18	WE	907A	30		HFS850A	35.00	
									7/19	TH	916A	30		HFS850A	35.00	
									7/20	FR	858A	30		AERA1	35.00	2905
	X	X				M-F 10A-12P	40.00	4	7/16	MO	1029A	30		HFS850A	40.00	
									7/17	TU	1009A	30		HFS850A	40.00	
									7/19	TH	959A	30		HFS850A	40.00	
									7/20	FR	1059A	30		AERA1	40.00	2905
X		X				M-F 1230-4PM	125.00	3	7/16	MO	359P	30		HFS850A	125.00	
									7/18	WE	1229P	30		HFS850A	125.00	
									7/20	FR	1229P	30		AERA1	125.00	2905

PAYMENT DUE
 WITHIN 10 DAYS
 OF RECEIPT OF INVOICE

INVOICE / AFFIDAVIT

Louie Boyd

My Commission Expires May 14, 1988

SCHEDULE COST FOR THIS BILLING PERIOD	ACTUAL COST	NET GROSS	TOTAL
1,185.00	0.00	0778750	81,007.25

PLEASE RETURN COPY WITH YOUR REMITTANCE

CLIENT 1

WNCT-TV 07/26/84 PAGE: 1

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

WNCT-TV 9 
Roy H. Park Broadcasting, Inc.
P.O. Box 888 Greenville, N.C. 27834 (919) 756-3180

27834

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

27619

REGIONAL PERETIC, BOB/REGIONAL

HELMS FOR SENATE HELMS FOR SENATE

ORIGINAL

INV# 8200-02 THRU 07/25/84

7/21-07/22/84 STANDARD

TERMS: DUE AND PAYABLE UPON RECEIPT OF INVOICE

SCHEDULE		TIME		RATE		SPOTS		DAYS		CLASS		AMOUNT	
LN	SP	SA	SU	TIME	RATE	SPOTS	DAYS	CLASS	AMOUNT	REMARKS	AMOUNT	REMARKS	
	X			400PM-0600PM	275.00	1	7/21	8A	455P	30	AFR#1	275.00	✓ 1895
	X			SUN 9-1030AM	100.00	1	7/22	SU	931A	30	AFR#1R	100.00	✓ 1895
					375.00	1							
						1			875000	5	0	\$6.25	8
												318.75	

**PAYMENT DUE
WITHIN 10 DAYS
OF RECEIPT OF INVOICE**

Louie Boyd

My Commission Expires May 14, 1988

INVOICE / AFFIDAVIT

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

CLIENT 1

WNCT-TV 9 
 Roy H. Park Broadcasting, Inc.
 P.O. Box 898 Greenville, N.C. 27834 (919) 756-3180

WNCT-TV 07/31/84 PAGE: 1

27834
 AGENCY: JEFFERSON MARKETING
 3825 BARRETT DRIVE
 RALEIGH, N.C.

27619

REGIONAL	PERETIC, BOB/REGIONAL
ADVERTISER	HELMS F/SENATE/REAGAN
HELMS FOR SENATE	HELMS F/SENATE/REAGAN

ORIGINAL	
INV# 8154-02	6/25-07/29/84
7/23-07/27/84	STANDARD

TERMS: DUE AND PAYABLE UPON RECEIPT OF INVOICE

TU	W	TH	F	SA	SU	TIME	RATE	NO	DATES	DAY	SEC	SPOTS	AMOUNT	STATION	CLASS
X	X	X	X			800AM-0900AM	40.00	5	7/23	MO	759A	30	40.00	AFR#1	40.00
									7/24	TU	825A	30	40.00	AFR#1	40.00
									7/25	WE	859A	30	40.00	AFR#1	40.00
									7/26	TH	759A	30	40.00	AFR#1	40.00
									7/27	FR	800A	30	40.00	AFR#1	40.00
	X	X				M-SAT 559-6P	250.00	2	7/26	TH	558P	30	250.00	AFR#1	250.00
									7/27	FR	558P	30	250.00	AFR#1	250.00
	X	X				1130PM	160.00	2	7/26	TH	1129P	30	160.00	AFR#1	160.00
									7/27	FR	1129P	30	160.00	AFR#1	160.00

30%

**PAYMENT DUE
 WITHIN 10 DAYS
 OF RECEIPT OF INVOICE.**

INVOICE / AFFIDAVIT

Lina Boyd
 My Commission Expires May 14, 1988

SCHEDULE COST FOR THIS INVOICE	1,020.00	7	1,020.00	5	0	153.00	9	8	867.00
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PLEASE RETURN COPY WITH YOUR REMITTANCE

GE 21 7/31/84

INVOICE AFFIDAVIT **WITN-TV, INC.**

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

COPY 1



ADVERTISER	2435
HELMS POL/REP	
SALESMAN	FRANK BRADY

BROADCAST MONTH	JULY
BILLING PERIOD	7/23-7/29/84

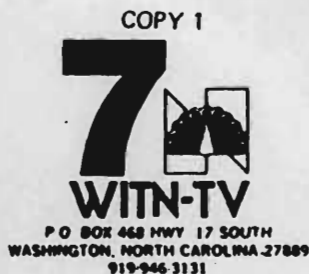
/29/84 INVOICE #: 8407121 PAGE 1

SCHEDULE										ACTUAL BROADCAST						RECONCILIATION			
TIME	RATE	NO.	M	TU	W	TH	F	SA	SU	DATES	DAY	TIME	DUR.	M/G FOR	PRODUCT/FILM	RATE	DEBIT/CREDIT	REMARKS	
***** 8075 U.S. SEN(REAGAN) *****																			
F 7-9A	\$30	5	1	1	1	1	1												
										7/23	MO	7:24A	30		AFR-1	\$30	✓	30x1	
										7/24	TU	7:15A	30		HFS-850-A	\$30		-miscel	
										7/25	WE	8:14A	30		AFR-1	\$30	✓	30x1	
										7/26	TH	7:15A	30		AFR-1-R	\$30	✓		
										7/27	FR	8:21A	30		AFR-1-R	\$30	✓		
SU 5:58-7P	\$140	1				1				RUN BETWEEN		6:28 PM AND 6:30 PM							
***										7/26	TH	6:28P	30		HFS-850-A	\$140		-miscel	
SU 5:58-7P	\$140	1					1			RUN AFTER		6:57 PM							
***										7/27	FR	6:58P	30		HFS-850-A	\$140		-miscel	
SU 11-11:30P	\$65	2				1	1			RUN AFTER		11:28 PM							
***										7/26	TH	11:29P	30		HFS-850-A	\$65		-miscel	
										7/27	FR	11:29P	30		HFS-850-A	\$65		-miscel	
SCHEDULE COST FOR THIS BILLING PERIOD										ACTUAL GROSS BILLING		AGENCY COMMISSION		NET DUE		SUB-TOTALS		RECONCILIATION	
\$560.00										\$560.00		\$84.00		\$476.00				\$.00	

Frank Brady

INVOICE AFFIDAVIT WITN-TV, INC. 0

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



ADVERTISER	2435
HELMS POL/REP	
SALESMAN	FRANK BRADY

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

7/22/84 INVOICE #: 8407095 PAGE 1

SCHEDULE											ACTUAL BROADCAST					RECONCILIATION		
TIME	RATE	NO.	M	TU	W	TH	F	SA	SU	DATES	DAY	TIME	DUR.	M/G FOR	PRODUCT/FILM	RATE	DEBIT/CREDIT	REMARKS

7-9A	\$30	3	1		1		1			7/16	MO	8:11A	30		HFS-101	\$30		
										7/18	WE	8:29A	30		HFS-850-A	\$30		
										7/20	FR	7:20A	30		AFR-1	\$30		
7-9A	\$30	2		1		1				7/17	TU	8:29A	30		HFS-850-A	\$30		
										7/19	TH	7:29A	30		HFS-850-A	\$30		
SU 11-11:30P	\$65	1					1			RUN AFTER 11:28 PM								
										7/19	TH	11:29P	30		HFS-850-A	\$65		
SU 11-11:30P	\$65	2					1	1		RUN AFTER 11:28 PM								
										7/20	FR	11:28P	30		HFS-850-A	\$65		
										7/21	SA	11:28P	30		HFS-850-A	\$65		
1130P-1230A	\$35	1		1						7/17	TU	12:28A	30		HFS-850-A	\$35		
1130P-1230A	\$35	1			1					7/18	WE		30		NONE		\$35CR	NET OVER RUN
SCHEDULE COST FOR THIS BILLING PERIOD											ACTUAL GROSS BILLING		AGENCY COMMISSION		NET DUE		SUB-TOTALS	RECONCILIATION
\$415.00											P 386.00 0		5 0 \$7.00 9 8		\$323.00			\$35.00CR

22 7/24/84

INVOICE AFFIDAVIT **WITN-TV, INC.**

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



ADVERTISER	2435
HELMS POL/REF	
SALESMAN	FRANK BRADY

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

7/22/84 INVOICE #: 8407096 PAGE 1

SCHEDULE											ACTUAL BROADCAST						RECONCILIATION		
TIME	RATE	NO.	M	TU	W	TH	F	SA	SU	DATES	DAY	TIME	DUR.	M/G FOR	PRODUCT/FILM	RATE	DEBIT/CREDIT	REMARKS	
***** 1024 J.S. BEN (WOM) *****																			
12:28-3:30P	\$35	5	1	1	1	1	1			7/16	MO	3:15P	30		HFS-850-A	\$35		✓	
										7/17	TU	12:29P	30		HFS-850-A	\$35			
										7/18	WE	2:24P	30		HFS-850-A	\$35			
										7/19	TH	3:25P	30		HFS-850-A	\$35			
										7/20	FR	3:56P	30		AFR-1-R	\$35			
1158A-1227P ***	\$30	3	1		1		1			NOON									
										7/16	MO	11:59A	30		HFS-850-A	\$30		✓	
										7/18	WE	11:59A	30		HFS-850-A	\$30			
										7/20	FR	11:59A	30		AFR-1	\$30			
6-7A	\$25	5	1	1	1	1	1			7/16	MO	6:11A	30		HFS-850-A	\$25		✓	
										7/17	TU	6:36A	30		HFS-850-A	\$25			
										7/18	WE	6:52A	30		HFS-850-A	\$25			
										7/19	TH	6:58A	30		HFS-850-A	\$25			
										7/20	FR	6:20A	30		AFR-1	\$25			
9-11:57A	\$30	5	1	1	1	1	1			7/16	MO	9:33A	30		HFS-850-A	\$30		✓	
										7/17	TU	10:58A	30		HFS-850-A	\$30			
										7/18	WE	9:32A	30		HFS-850-A	\$30			
										7/19	TH	9:31A	30		HFS-850-A	\$30			
										7/20	FR	9:31A	30		AFR-1	\$30			
5:00-5:57P	\$50	2		1		1													

SCHEDULE COST FOR THIS BILLING PERIOD	ACTUAL GROSS BILLING	AGENCY COMMISSION	NET DUE	SUB-TOTALS	RECONCILIATION
	54445	50308	8		

IE 24 7/24/84

INVOICE AFFIDAVIT **WITN-TV, INC.**

JEFFERSON MARKETING
 PO BOX 19807
 3925 BARRETT DR. SUITE 301
 RALEIGH, NC 27619

COPY 1



ADVERTISER	2435
HELMS POL/REP	
SALESMAN	
FRANK BRADY	

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

7/22/84 INVOICE #: 8407097

PAGE 1

SCHEDULE											ACTUAL BROADCAST						RECONCILIATION			
TIME	RATE	NO.	M	TU	W	TH	F	SA	SU	DATES	DAY	TIME	DUR.	M/G FOR	PRODUCT/FILM	RATE	DEBIT/CREDIT	REMARKS		
***** 3026 U.S. SEN (KNOX) *****																				
7-9A	\$30	1					1			7/20	FR	8:21A	30		AFR-1	\$30	✓ 2623			
7-9A	\$30	4	1	1	1	1				7/16	MO	7:15A	30		HFS-850-A	\$30				
										7/17	TU	8:14A	30		HFS-850-A	\$30				
										7/18	WE	8:59A	30		HFS-850-A	\$30	✓			
										7/19	TH	7:59A	30		HFS-850-A	\$30				
1130P-1230A	\$35	1					1			7/20	FR	11:59P	30		AFR-1-R	\$35	✓ 2623			
1130P-1230A	\$35	4	1	1	1	1				7/16	MO	12:03A	30		HFS-850-A	\$35				
										7/17	TU	12:17A	30		HFS-850-A	\$35				
										7/18	WE		30		NONE					
										7/19	TH	11:37P	30		HFS-850-A	\$35	Ⓞ	NET OVER RUN		
SPECIALS	\$100	1							1	RUN BETWEEN		3:58 PM AND 5:30 PM								
										7/22	SU	2:08P	30		AFR-1-R	\$100	✓ 2623			
GENERAL	\$125	1							1	RUN BETWEEN		3:58 PM AND 7:00 PM								
										7/21	SA	4:36P	30		AFR-1-R	\$125	✓ 2623			
SCHEDULE COST FOR THIS BILLING PERIOD											ACTUAL GROSS BILLING		AGENCY COMMISSION		NET DUE		SUB-TOTALS		RECONCILIATION	
\$550.00											\$515.00		\$77.25		\$437.75		\$35.00CR			

JE 25 7/26/84

INVOICE AFFIDAVIT **WITN-TV, INC.**

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



ADVERTISER	2435
HELMS POL/REF	
SALESMAN	
FRANK BRADY	

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

22/84 INVOICE #: 8407098 PAGE 1

SCHEDULE											ACTUAL BROADCAST						RECONCILIATION			
TIME	RATE	NO.	M	TU	W	TH	F	SA	SU	DATES	DAY	TIME	DUR.	M/G FOR	PRODUCT/FILM	RATE	DEBIT/CREDIT	REMARKS		

\$141 US SEN (REAGAN) 2																				

SU 5:58-7P	\$140	1							1	7/22	SU	6:30P	30		AFR-1-R	\$140	} 1895	✓		
SEE ALL	\$125	1						1		RUN BETWEEN 1:30 PM AND 7:00 PM										
										7/21	SA	2:08P	30		AFR-1-R	\$125				
7-7:57P	\$130	1						1		7/21	SA	7:56P	30		AFR-1-R	\$130				

SCHEDULE COST FOR THIS BILLING PERIOD	ACTUAL GROSS BILLING	AGENCY COMMISSION	NET DUE	SUB-TOTALS	RECONCILIATION
\$395.00	2 6 7 5 0 5 0 \$395.00	\$59.25	\$335.75		\$.00

2325
N. N.C.



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

28560

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

27619

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

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

SCHEDULE						ACTUAL BROADCAST							RECONCILIATION						
TU	W	TH	F	SA	SU	TIME	RATE	NO.	DATES	DAY	TIME	TYPE LN SEC	M/G FOR	COPY NUMBER	RATE	DEBIT	CREDIT	REMARKS	
			X			7-9A M-F	35.00	4	7/13	FR	846A	30		HFS811	35.00				
									7/13	FR	859A	30		HFS811	35.00				
									7/20	FR	818A	30		HFS-850A	35.00			} MISSED	
									7/20	FR	850A	30		HFS-850A	35.00				
X	X	X				7-9A M-F	35.00	16	7/16	MO	745A	30		HFS850A	35.00				✓
									7/16	MO	817A	30		HFS850A	35.00				
									7/17	TU	759A	30		HFS-850A	35.00				
									7/17	TU	811A	30		HFS-850A	35.00				
									7/18	WE	711A	30		HFS-850A	35.00				
									7/18	WE	720A	30		HFS-850A	35.00				
									7/19	TH	752A	30		HFS-850A	35.00				
									7/19	TH	850A	30		HFS-850A	35.00				
									7/23	MO	753A	30		HFS850A	35.00				
									7/23	MO	859A	30		HFS850A	35.00				
									7/24	TU	743A	30		HFS850A	35.00				
									7/24	TU	846A	30		HFS850A	35.00				
									7/25	WE	718A	30		HFS850A	35.00				
									7/25	WE	759A	30		HFS850A	35.00				
									7/26	TH	710A	30		HFS850A	35.00				
									7/26	TH	812A	30		HFS850A	35.00				
				X		5-630P SAT	60.00	2	7/14	SA	523P	30		HFS811	60.00			D2623	
									7/21	SA	629P	30		AFR-1	60.00				
				X		AM. SPORTSMAN	60.00	1	7/15	SU	238P	30		HFS811	60.00				
			X			800PM-1100PM	225.00	1	7/13	FR	813P	30		HFS811	225.00				
				X		800PM-1100PM	300.00	1	7/15	SU	1032P	30		HFS811	300.00				

INVOICE / AFFIDAVIT

Marybeth Lopez James

SCHEDULE CHG FOR THIS BILLING PERIOD	ACTUAL GROSS BILLING	AGENCY COMMISSION	NET DUE	SUB-TOTALS	RECONCILIATION
	844448	502098			

WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG.

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

28560

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

27619

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

ORDER TYPE ORIGINAL	AGENCY ESTIMATE NO.
INVOICE NUMBER INV# 2616-01	BROADCAST MONTH 6/25-07/29/84
SCHEDULE DATES 7/20-07/21/84	BILLING PERIOD STANDARD

SCHEDULE						ACTUAL BROADCAST							RECONCILIATION										
TU	W	TH	F	SA	SU	TIME	RATE	NO.	DATES	DAY	TIME	TYPE MIN SEC	M/G FOR	COPY NUMBER	RATE	DEBIT	CREDIT	REMARKS					
			X			6-7P M-F	175.00	1	7/20	FR	600P	30		AFR-1	175.00								
				X		11-1130P M-S	100.00	1	7/21	SA	1129P	30		AFR-1	100.00								
					X	5-630P SAT	60.00	1	7/21	SA	559P	30		AFR-1	60.00								
SCHEDULE COST FOR THIS BILLING PERIOD						335.00	ACTUAL GROSS BILLING		67	335.00	AGENCY COMMISSION		5	0	30.25	5	NET DUE		8	284.75	SUB-TOTALS		RECONCILIATION

1895

INVOICE / AFFIDAVIT

Mary Ann Lopez James

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

WCTI-TV 07/30/84 PAGE: 1

REMIT TO:

28560

BILL TO:

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

27619

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

ORDER TYPE ORIGINAL	AGENCY ESTIMATE NO.
INVOICE NUMBER INV# 2523-01	BROADCAST MONTH 6/25-07/29/84
SCHEDULE DATES 7/23-07/27/84	BILLING PERIOD STANDARD

SCHEDULE							ACTUAL BROADCAST							RECONCILIATION						
M	TU	W	TH	F	SA	SU	TIME	RATE	NO.	DATES	DAY	TIME	TYPE SEC	M/G FOR	COPY NUMBER	RATE	DEBIT	CREDIT	REMARKS	
X	X	X	X	X			7-9A M-F	35.00	5	7/23	MO	859A	30		AFR-1	35.00	} v 3046			
										7/24	TU	811A	30		AFR-1	35.00				
										7/25	WE	859A	30		AFR-1	35.00				
										7/26	TH	747A	30		AFR-1	35.00				
										7/27	FR	819A	30		AFR-1	35.00				
X	X	X	X	X			130PM-1230AM	40.00	5	7/23	MO	1228A	30		AFR-1	40.00				
										7/24	TU	1215A	30		AFR-1	40.00				
										7/25	WE	1147P	30		AFR-1	40.00				
										7/26	TH	1215A	30		AFR-1	40.00				
										7/27	FR	1211A	30		AFR-1	40.00				
			X	X			6-7P M-F	175.00	2	7/26	TH	559P	30		AFR-1	175.00				
										7/27	FR	659P	30		AFR-1	175.00				
			X	X			1-1130P M-S	100.00	2	7/26	TH	1129P	30		AFR-1	100.00				
										7/27	FR	1130P	30		AFR-1	100.00				

Maryland Angel James

INVOICE / AFFIDAVIT

SCHEDULE COST FOR THIS BILLING PERIOD	ACTUAL GROSS BILLING	AGENCY COMMISSION	NET DUE	SUB-TOTALS	RECONCILIATION
925.00	0 5 025100	0 38759	786.25		

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

28560

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

27619

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

ORDER TYPE REVISION-06	AGENCY ESTIMATE NO.
INVOICE NUMBER INV# 2388-01	BROADCAST MONTH 6/25-07/29/84
SCHEDULE DATES 7/16-08/10/84	BILLING PERIOD STANDARD

SCHEDULE						ACTUAL BROADCAST							RECONCILIATION					
TU	W	TH	F	SA	SU	TIME	RATE	NO.	DATES	DAY	TIME	TYPE MIN SEC	M/G FOR	COPY NUMBER	RATE	DEBIT	CREDIT	REMARKS
X	X	X				11A-4P M-F	40.00	10	7/16	MO	1259P	30		HFS850A	40.00			
									7/17	TU	234P	30		HFS-850A	40.00			
									7/18	WE	159P	30		HFS-850A	40.00			
									7/19	TH	159P	30		HFS-850A	40.00			
									7/20	FR	359P	30		HFS-850A	40.00			
									7/23	MO	1159A	30		HFS850A	40.00			
									7/23	MO	1228P	30		HFS850A	40.00			
									7/24	TU	1129A	30		HFS850A	40.00			
									7/25	WE	234P	30		HFS850A	40.00			
									7/27	FR	1159A	30		HFS850A	40.00			
X		X				7-730P M-F	135.00	4	7/17	TU	721P	30		HFS-850A	135.00			
									7/19	TH	708P	30		HFS-850A	135.00			
									7/24	TU	726P	30		HFS850A	135.00			
									7/26	TH	712P	30		HFS850A	135.00			
X		X				530-6P M-F	100.00	6	7/16	MO	558P	30		HFS850A	100.00			
									7/18	WE	529P	30		HFS-850A	100.00			
									7/20	FR	556P	30		HFS-850A	100.00			
									7/23	MO	542P	30		HFS850A	100.00			
									7/25	WE	557P	30		HFS850A	100.00			
									7/27	FR	530P	30		HFS850A	100.00			

Musical
✓
2 weeks

Musical

INVOICE / AFFIDAVIT

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SCHEDULE TOTAL FOR THE BILLING PERIOD	ACTUAL GROSS BILLING	AGENCY COMMISSION	NET DUE	SUB-TOTALS	RECONCILIATION
1,540.00	1,540.00	301.00	1,309.00		

INVOICE

AGENCY BILLING ADDRESS

JEFFERSON MARKETING INC
P O BOX 19807
RALEIGH NC 27619

ATLANTIC TELECASTING, CORP.
P O BOX 4029-AZALEA STATION
WILMINGTON, NORTH CAROLINA 28406

WECT-TV
CHANNEL 6
915-751-8070

INVOICE NUMBER	DATE	PAGE
474735C1	7-25-84	1
RATE CARD	BROADCAST MONTH	AGENCY
CC	JULY	YES

MAKE PAYMENT TO

ATLANTIC TELECASTING
P O BOX 4029-AZALEA STATION
WILMINGTON NC 28406

REPRESENTATIVE	PRODUCT	CONTRACT END DATE
REGIONAL	FCL US SENATE REP	6-05-84
ADVERTISER	SALES PERSON NUMBER	CONTRACT NUMBER
FELKS FOR SENATE	HSE 9999	474735
		CUSTOMER NUMBER
		740620

SCHEDULE		ACTUAL BROADCAST										RECONCILIATION	
INVOICE	BILLING DATES	MTWTFSS	TIME PERIOD	RATE	SPOTS	DATE	DAY	TIME	STATION	PROGRAM	AMOUNT	REMARKS	ORIG
7-16	7-22	11111	6-7AM	35		7-16	MO	30	625A	HFS-850-A	35		
						7-17	TU	30	650A	HFS-850-A	35		
						7-18	WE	30	656A	HFS-850-A	35		
						7-19	TH	30	651A	HFS-850-A	35		
					5	7-20	FR	30	651A	AFR-1 AMERICAN FOR REA	35	v2905	
7-16	7-22	11111	7-9AM	45		7-16	MO	30	828A	HFS-850-A	45		
						7-17	TU	30	721A	HFS-850-A	45		
						7-18	WE	30	723A	HFS-850-A	45		
						7-19	TH	30	822A	HFS-850-A	45		
					5	7-20	FR	30	822A	AFR-1 AMERICAN FOR REA	45	v2623	
7-16	7-22	ROTATING	110-1130AM	35		7-17	TU	30	1028A	HFS-850-A	35		
					2	7-18	WE	30	1058A	HFS-850-A	35		
7-16	7-22	11111	12N ACJ	35		7-16	MO	30	1159A	HFS-850-A	35		
						7-17	TU	30	1159A	HFS-850-A	35		
						7-18	WE	30	1159A	HFS-850-A	35		
						7-19	TH	30	1159A	HFS-850-A	35		
					5	7-20	FR	30	1159A	AFR-1 REV	35	v2905	
7-16	7-22	1 1 1	1130A-12N	35		7-16	MO	30	1143A	HFS-850-A	35		
						7-18	WE	30	1131A	HFS-850-A	35		
					3	7-20	FR	30	1131A	AFR-1 REV	35	v2905	
7-16	7-22	ROTATING	1230-4P	80		7-16	MO	30	227P	HFS-850-A	80		
						7-19	TH	30	258P	HFS-850-A	80		
					3	7-20	FR	30	129P	AFR-1 AMERICAN FOR REA	80	v2623	

CONTINUED NEXT PAGE

MONTHLY COST CONFIRMATION

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

Phyllis E. H...
3/25/84

ACTUAL GROSS BILLING	SUB TOTAL
AGENCY COMMISSION	TOTAL RECONCILING ITEMS
NET DUE AMOUNT	

86030604452

INVOICE

AGENCY BILLING ADDRESS

JEFFERSON MARKETING INC
P O BOX 198C7
RALFICH NC 27619

ATLANTIC TELECASTING, CORP.
P O BOX 4029-AZALEA STATION
WILMINGTON, NORTH CAROLINA 28406

WECT-TV
CHANNEL 6
919-761-8070

INVOICE NUMBER	DATE	PAGE
47473501	7-25-84	2
RATE CARD	BROADCAST MONTH	AGENCY
CG	JULY	YES

MAKE PAYMENT TO

ATLANTIC TELECASTING
P O BOX 4029-AZALEA STATION
WILMINGTON NC 28406

REPRESENTATIVE	PRODUCT	CONTRACT END DATE
REGIONAL	US SENATE REP	8-05-84
ADVERTISER	SALESPERSON NUMBER	CONTRACT NUMBER
HELMS FOR SENATE	FSE 9999	474735
		CUSTOMER NUMBER
		740620

SCHEDULE					ACTUAL BROADCAST					RECONCILIATION	
DATE	TIME	SPOTS	SECS	SPOTS	DATE	TIME	SPOTS	SECS	SPOTS	REMARKS	
7-16	7-22	ROTATING	21230-4P	80	7-17	TU	30	326P	80		
				2	7-18	WE	20	326P	60		
7-16	7-22	1 1	9-10AM	35	7-17	TU	20	935A	35		
				2	7-19	TH	20	919A	35		
7-16	7-22	1 1 1	9-10AM	35	7-16	MO	30	929A	35	REPLACEMENT	
					7-18	WE	30	910A	35	REPLACEMENT	
				3	7-20	FR	20	936A	35	REPLACEMENT	

MONTHLY COST CONFIRMATION

1,325.00

Phyllis E. Hall
3/25/86

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

ACTUAL GROSS BILLING	1,325.00	SUB-TOTAL
AGENCY COMMISSION	198.75	TOTAL RECONCILING ITEMS
NET DUE AMOUNT	1,126.25	

ORIGINAL COPY-1

86030504453

MAILING ADDRESS

JEFFERSON MARKETING INC
P O BOX 19807
RALEIGH NC 27619

ATLANTIC TELECASTING, CORP.
P O BOX 4029-AZALEA STATION
WILMINGTON, NORTH CAROLINA 28406

WECT-TV
CHANNEL 6
919-791-8070

INVOICE NUMBER	DATE	PAGE
47473801	7-31-84	1
RATE CARD	BROADCAST MONTH	AGENCY
00	JULY	YES

MAKE PAYMENT TO

ATLANTIC TELECASTING
P O BOX 4029-AZALEA STATION
WILMINGTON NC 28406

REPRESENTATIVE	PRODUCT	CONTRACT END DATE
REGIONAL	POL US SENATE REP	8-05-84
ADVERTISER	SALES PERSON NUMBER	CONTRACT NUMBER
HELMS FOR SENATE	HSE 9999	474738
		CUSTOMER NUMBER
		740620

SCHEDULE				ACTUAL BROADCAST				RECONCILIATION						
DATE	TIME	SPOTS	SECS	DATE	TIME	SPOTS	SECS	DATE	TIME	SPOTS	SECS	REMARKS	ADJUST	
7-13	7-19	1 1 1 1 1		7-9AM		45		7-13	FR	30	813A	HFS 811	45	
								7-16	MO	30	723A	HFS-850-A	45	
								7-17	TU	30	822A	HFS-850-A	45	
								7-18	WE	30	828A	HFS-850-A	45	
								7-19	TH	30	813A	HFS-850-A	45	
7-13	7-19		1	4P-CC SW		80	1	7-15	SU	30	418P	HFS 811	80	
7-13	7-19		1	130P-CC BB		80	1	7-14	SA	30	332P	HFS 811	80	
7-13	7-19	1	1 1	1130-1230A		50		7-13	FR	30	1226A	HFS 811	50	
								7-16	MO	30	1203A	HFS-850-A	50	
								7-19	TH	30	1219A	HFS-850-A	50	
7-20	7-26	1 1 1 1		1130-1230A		50	3	7-23	MO	30	1136P	HFS-850-A	50	
								7-24	TU	30	1213A	HFS-850-A	50	
								7-25	WE	30	1229A	DUE BASEBALL RAN OVER	N/C AIR INCORR	50-
								7-26	TH	30	1229A	HFS-850-A	50	
7-20	7-26		1	2P-CC RC		80	1	7-22	SU	30	613P	AFR-1 REV.	80	
7-20	7-26	1 1 1 1 1		7-9AM		45		7-20	FR	30	859A	AFR-1 AMERICAN FOR REA	45	
								7-23	MO	30	716A	HFS-850-A	45	
								7-24	TU	30	828A	HFS-850-A	45	
								7-25	WE	30	858A	HFS-850-A	45	
								7-26	TH	30	722A	HFS-850-A	45	
7-20	7-26		1	8P-CC BB		300	1	7-25	WE	30	826P	HFS-850-A	300	

MONTHLY COST CONFIRMATION

1,340.00

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

[Signature]

My Commission Expires March 31, 1987

W.M.

ORIGINAL COPY-1

ACTUAL GROSS BILLING	1,290.00	SUB-TOTAL	50CR
AGENCY COMMISSION	193.50	TOTAL RECONCILING ITEMS	50CR
NET DUE AMOUNT	1,096.50		

86030504454

INVOICE

AGENCY BILLING ADDRESS

JEFFERSON MARKETING INC
P O BOX 19807
RALEIGH NC 27619

ATLANTIC TELECASTING, CORP.
P O BOX 4029-AZALEA STATION
WILMINGTON, NORTH CAROLINA 28406

HECT-TV
CHANNEL 6
919-791-8070

INVOICE NUMBER	DATE	PAGE
47475801	7-31-84	1
RATE CARD #	BROADCAST MONTH	AGENCY #
00	JULY	YES

MAKE PAYMENT TO

ATLANTIC TELECASTING
P O BOX 4029-AZALEA STATION
WILMINGTON NC 28406

REPRESENTATIVE	PRODUCT	CONTRACT END DATE
REGIONAL	POL U S SENATE-R REAGAN	7-29-84
ADVERTISER	SALES PERSON NUMBER	CONTRACT NUMBER
HELMS FOR SENATE	HSE 9999	474758
		CUSTOMER NUMBER
		740620

SCHEDULE				ACTUAL BROADCAST								RECONCILIATION	
7-23	7-29	1 1 1 1 1	7-9AM	45		7-23	MO	30	813A	AFR-1 REV	45	} 30+5	
						7-24	TU	30	714A	AFR-1 REV	45		
						7-25	WE	30	821A	AFR-1 REV	45		
						7-26	TH	30	714A	AFR-1 REV	45		
				5		7-27	FR	30	714A	AFR-1 REV	45		
7-23	7-29	1 1	6P ADJ	250		7-26	TH	30	558P	AFR-1 REV	250		
						7-27	FR	30	559P	AFR-1 REV	250		
7-23	7-29	1 1	1130P BRK	125		7-26	TH	30	1129P	AFR-1 REV	125		
						7-27	FR	30	1128P	AFR-1 REV	125		

MONTHLY COST CONFIRMATION

975.00

Signature

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

ACTUAL GROSS BILLING	975.00	SUB-TOTAL
AGENCY COMMISSION	146.25	TOTAL RECONCILING ITEMS
NET DUE AMOUNT	828.75	

86030504455

INVOICE

6

AGENCY BILLING ADDRESS

JEFFERSON MARKETING INC
P O BOX 19807
RALEIGH NC 27619

ATLANTIC TELECASTING, CORP.
P O BOX 4029-AZALEA STATION
WILMINGTON, NORTH CAROLINA 28406

WECT-TV
CHANNEL 6
919-791-8070

INVOICE NUMBER	DATE	PAGE
47476901	7-31-84	1
RATE CARD	BROADCAST MONTH	AGENCY
00	JULY	YES

MAKE PAYMENT TO

ATLANTIC TELECASTING
P O BOX 4029-AZALEA STATION
WILMINGTON NC 28406

REPRESENTATIVE	PRODUCT	CONTRACT END DATE
REGIONAL	POL US SEN REAGAN II	7-27-84
ADVERTISER	SALES ORDER NUMBER	CONTRACT NUMBER
HELMS FOR SENATE (R)	HSE 9999	474769
		CUSTOMER NUMBER
		740620

SCHEDULE				ACTUAL BROADCAST								RECONCILIATION			
START DATE	END DATE	LN	REV	TIME PERIOD	RATE	NO.	DATE	DAY	LENGTH	TIME	AGENCY	REV	AMOUNT	MARKS	DRY
7-21	7-27		1	1P-CC BB	80	1	7-21	SA	30	435P	AFR-1 REV	80	} 1895		
7-21	7-27		1	1230-1P	60	1	7-22	SU	30	1259P	AFR-1 REV	60			
7-21	7-27		1	630P ADJ	250	1	7-22	SU	30	629P	AFR-1 REV	250			
7-21	7-27		1	12M ADJ	125	1	7-22	SU	30	1159P	AFR-1 REV	125			

MONTHLY COST CONFIRMATION

515.00

ACTUAL GROSS BILLING	515.00	SUB-TOTAL
AGENCY COMMISSION	77.25	TOTAL RECONCILING ITEMS
NET DUE AMOUNT	437.75	

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

Thomas Suberville

NC Commission Expires March 31, 1987

ORIGINAL COPY-1

86030504456

WWAY-TV3
 PO BOX 2068
 WILMINGTON NC

28402

JEFFERSON MARKETING IN
 BOX 19807
 RALEIGH, NC

Knox

WWAY
3

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

WWAY-TV 08/01/84 PAGE: 2

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

ORDER TYPE	AGENCY ESTIMATE NO.
ORIGINAL	
CONTRACT NUMBER	BROADCAST MONTH
INVS 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

SCHEDULE						ACTUAL BROADCAST						RECONCILIATION															
TU	W	TH	F	SA	SU	TIME	RATE	NO.	DATES	DAY	TIME	TYPE MIN	SEC	M/G FOR	PRODUCT/FILM	RATE	DEBIT	CREDIT	REMARKS								
									7/26	TH	820A				HFS850-A	30.00											
		X				800PM-1101PM	325.00	1	7/26	TH	926P				HFS850-A	325.00											
				X		WVOS SAT	75.00	1	7/21	SA	559P				AFR-1	75.00			V 23								
						8P-CC BASEBAL	225.00	1	7/23	MO	839P				HFS850-A	225.00											
SCHEDULE COST FOR THIS BILLING PERIOD						2,025.00		ACTUAL GROSS BILLING		2,715.00		AGENCY COMMISSION		502.25		PAY THIS AMOUNT		81,508.75		SUB-TOTALS		250.00		RECONCILIATION		250.00	

*Celeste Radwick
 Mary Heiden*

TV3
PO BOX 2068
WILMINGTON NC

WWAY 3

HWAY-TV 08/01/84 PAGE: 1

28402

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

ORDER TYPE	AGENCY ESTIMATE NO.
ORIGINAL	
CONTRACT NUMBER	BROADCAST MONTH
INV# 6731-01	6/25-07/29/84
SCHEDULE DATES	BILLING PERIOD
7/13-07/26/84	STANDARD

JEFFERSON MARKETING (N
BOX 19807
RALEIGH, NC

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

ANY DISCREPANCIES SHOULD BE REPORTED IMMEDIATELY

PAYMENT IS DUE 30 DAYS FROM DATE OF INVOICE.

SCHEDULE							ACTUAL BROADCAST						RECONCILIATION						
TU	W	TH	F	SA	SU	TIME	RATE	NO.	DATES	DAY	TIME	TYPE MIN SEC	M/G FOR	PRODUCT/FILM	RATE	DEBIT	CREDIT	REMARKS	
			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				
						7A-9A	30.00	8	7/13	FR	853A	30		HFS-811	30.00				
X	X	X				7A-9A	30.00	8	7/16	MO	711A	30		HFS850-A	30.00				
						7A-9A	30.00		7/16	MO	859A	30		HFS850-A	30.00				
						7A-9A	30.00		7/17	TU	744A	30		HFS850-A	30.00				
						7A-9A	30.00		7/17	TU	810A	30		HFS850-A	30.00				
						7A-9A	30.00		7/18	WE	810A	30		HFS850-A	30.00				
						7A-9A	30.00		7/18	WE	849A	30		HFS850-A	30.00				
						7A-9A	30.00		7/19	TH	710A	30		HFS850-A	30.00				
						7A-9A	30.00		7/19	TH	859A	30		HFS850-A	30.00				
				X		WMOS SAT	75.00	1	7/14	SA	459P	30		HFS-811	75.00				
				X		800PM-1101PM	250.00	1	7/15	SU						250.00		PREEMPT	
				X		800PM-1101PM	250.00	1	7/20	FR	834P	30		AFR-1	250.00				
				X		7A-9A	30.00	2	7/20	FR	752A	30		AFR-1	30.00				
				X		7A-9A	30.00	2	7/20	FR	849A	30		AFR-1	30.00				
X	X	X				7A-9A	30.00	8	7/23	MO	709A	30		HFS850-A	30.00				
						7A-9A	30.00		7/23	MO	859A	30		HFS850-A	30.00				
						7A-9A	30.00		7/24	TU	810A	30		HFS850-A	30.00				
						7A-9A	30.00		7/24	TU	851A	30		HFS850-A	30.00				
						7A-9A	30.00		7/25	WE	746A	30		HFS850-A	30.00				
						7A-9A	30.00		7/25	WE	859A	30		HFS850-A	30.00				
						7A-9A	30.00		7/26	TH	714A	30		HFS850-A	30.00				
SCHEDULE COST FOR THIS BILLING PERIOD							ACTUAL GROSS BILLING			AGENCY COMMISSION			PAY THIS AMOUNT			SUM-TOTALS			RECONCILIATION
							857705			450309			8						

VOICE

WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG

WWAY-TV3
 P.O. BOX 2068
 WILMINGTON NC

WWAY
3

WWAY-TV 08/01/84 PAGE: 1

Beach

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

28402

JEFFERSON MARKETING IN
 BOX 19807
 RALEIGH, NC

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

ANY DISCREPANCIES SHOULD BE REPORTED IMMEDIATELY.

PAYMENT IS DUE 30 DAYS FROM DATE OF INVOICE.

SCHEDULE						ACTUAL BROADCAST							RECONCILIATION					
TU	W	TH	F	SA	SU	TIME	RATE	NO.	DATES	DAY	TIME	TYPE MIN SEC	M/G FOR	PRODUCT/FILM	RATE	DEBIT	CREDIT	REMARKS
X	X	X	X	X		7A-9A	25.00	20	7/02	MO	714A	30		HFS-101	25.00			
									7/03	TU	859A	30		HFS-105	25.00			
									7/04	WE	747A	30		HFS-101	25.00			
									7/05	TH	817A	30		HFS-105	25.00			
									7/06	FR	659A	30		HFS-101	25.00			
									7/09	MO	752A	30		HFS-101	25.00			
									7/10	TU	812A	30		HFS-105	25.00			
									7/11	WE	711A	30		HFS-101	25.00			
									7/12	TH	859A	30		HFS-105	25.00			
									7/13	FR	759A	30		HFS-101	25.00			
									7/16	MO	850A	30		HFS-101	25.00			
									7/17	TU	859A	30		HFS850-A	25.00			
									7/18	WE	746A	30		HFS-850A	25.00			
									7/19	TH	850A	30		HFS-850A	25.00			
									7/20	FR	811A	30		AFR-1	25.00			
									7/23	MO	852A	30		HFS-850A	25.00			
									7/25	WE	709A	30		HFS-850A	25.00			
									7/26	TH	738A	30		HFS-850A	25.00			
									7/27	FR	852A	30		HFS-850A	25.00			
									7/24	TU								
									7/27	FR	711A	30	7/24	HFS-850A	25.00	25.00		
				X	X	11-1130P	80.00	8	7/06	FR	1131P	30		HFS-101	80.00			
									7/07	SA	1100P	30		HFS-105	80.00			
									7/13	FR	1137P	30		HFS-101	80.00			
									7/14	SA	1059P	30		NEWS RAN	LATE DUE			SPORTS EVENT
									7/20	FR	1129P	30		AFR-1	80.00			
									7/21	SA	1100P	30		AFR-1	80.00			
									7/27	FR	1059P	30		HFS-850A	80.00			
									7/28	SA	1111P	30		HFS-850A	80.00			

Celeste Padwick
 25.00 TEC DIF
Mary Heider

223

223

SCHEDULE COST FOR THIS BILLING PERIOD	ACTUAL GROSS BILLING	AGENCY COMMISSION	PAY THIS AMOUNT	SUB-TOTALS	RECONCILIATION
1,140.00	6 51,440.00	9 0 181.00 9	8 969.00	25.00 25.00	

INVOICE

WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG.

WWAY-TV3
 PO BOX 2068
 WILMINGTON NC

WWAY
3

WWAY-TV 08/01/84 PAGE: 1

28402

JEFFERSON MARKETING IN
 BOX 19807
 RALEIGH, NC

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

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

ANY DISCREPANCIES SHOULD BE REPORTED IMMEDIATELY

PAYMENT IS DUE 30 DAYS FROM DATE OF INVOICE

SCHEDULE							ACTUAL BROADCAST							RECONCILIATION				
TU	W	TH	F	SA	SU	TIME	RATE	NO.	DATES	DAY	TIME	TYPE MIN SEC	M/G FOR	PRODUCT/FILM	RATE	DEBIT	CREDIT	REMARKS
	X					7P-730P	105.00	1	7/18	WE	722P	30		HFS850-A	105.00			
X		X				7A-9A	30.00	2	7/17	TU	710A	30		HFS850-A	30.00			
					X	500PM-0600PM	60.00	1	7/22	SU	537P	30		AFR-1	60.00			+2905
X	X	X	X			1230PM-0400PM	50.00	4	7/16	MO	159P	30		HFS850-A	50.00			
					X	HEE HAW	90.00	1	7/21	SA	713P	30		AFR-1	90.00			+2905
	X					7P-730P	105.00	1	7/25	WE	707P	30		HFS850-A	105.00			
X		X				1230PM-0400PM	50.00	2	7/24	TU	332P	30		HFS850-A	50.00			
					X	7A-9A	30.00	5	7/23	MO	745A	30		HFS850-A	30.00			
					X	500PM-0600PM	50.00	1	7/29	SU	532P	30		HFS850-A	50.00			
									7/24	TH	134P	30		HFS850-A	50.00			
									7/24	TU	710A	30		HFS850-A	30.00			
									7/25	WE	851A	30		HFS850-A	30.00			
									7/26	TH	859A	30		HFS850-A	30.00			
									7/27	FR	859A	30		HFS850-A	30.00			

*Celeste Kadunick
 Mary Heiden*

SCHEDULE COST FOR THIS BILLING PERIOD	ACTUAL GROSS BILLING	AGENCY COMMISSION	PAY THIS AMOUNT	SUB-TOTALS	RECONCILIATION
920.00	0 9 1620.00	9 0 138.00	8 782.00		

VOICE

WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG

WWAY-TV3
PO BOX 2068
WILMINGTON NC

WWAY
3

WWAY-TV 07/26/84 PAGE: 1

28402

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

JEFFERSON MARKETING IN
BOX 19807
RALEIGH, NC

REPRESENTATIVE CHARLOTTE, NC	SALESPERSON SELTEL, INC. CHAR
ADVERTISER REPUBLICAN SENATORIAL	PRODUCT HELMS' FOR SEN/REAGAN 2

ORDER TYPE ORIGINAL	AGENCY ESTIMATE NO.
CONTRACT NUMBER INVS 6843-02	BROADCAST MONTH THRU 07/22/84
SCHEDULE DATES 7/20-07/22/84	BILLING PERIOD STANDARD

ANY DISCREPANCIES SHOULD BE REPORTED IMMEDIATELY.

PAYMENT IS DUE 30 DAYS FROM DATE OF INVOICE.

SCHEDULE						ACTUAL BROADCAST							RECONCILIATION										
TU	W	TH	F	SA	SU	TIME	RATE	NO.	DATES	DAY	TIME	TYPE MIN	SEC	M/G FOR	PRODUCT/FILM	RATE	DEBIT	CREDIT	REMARKS				
			X			6P-630P	125.00	1	7/20	FR	629P	30			AFR-1	125.00							
				X		1200PM-0200PM	100.00	1	7/21	SA	1240P	30			AFR-1	100.00							
				X		430PM-0500PM	40.00	1	7/21	SA	459P	30			AFR-1	40.00							
					X	1100AM-0100PM	100.00	1	7/22	SU	1139A	30			AFR-1	100.00							
					X	230PM-0300PM	50.00	1	7/22	SU	307P	30			AFR-1	50.00							
					X	SUN NEWS	125.00	1	7/22	SU	618P	30			AFR-1	125.00							
SCHEDULE COST FOR THIS BILLING PERIOD						540.00	ACTUAL GROSS BILLING			1	9	540.00	AGENCY COMMISSION		5	0	81.00	PAY THIS AMOUNT		8	459.00	SUB-TOTALS	reconciliation

✓ 1895

*Celeste Radwick
Mary Heider*

WWAY-TV3
 PO BOX 2068
 WILMINGTON NC

Reagan **WWAY 3**

WWAY-TV 08/01/84 PAGE: 1

28402

JEFFERSON MARKETING (N
 BOX 19807
 RALEIGH, NC

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

REPRESENTATIVE	SALESPERSON
CHARLOTTE, NC	SELTEL, INC. CHAR
ADVERTISER	PRODUCT
REPUBLICAN SENATORIAL	HELMS FOR SEN/REAGAN

ORDER TYPE	AGENCY ESTIMATE NO.
ORIGINAL	
CONTRACT NUMBER	BROADCAST MONTH
INV# 6769-02	6/25-07/29/84
SCHEDULE DATES	BILLING PERIOD
7/23-07/27/84	STANDARD

ANY DISCREPANCIES SHOULD BE REPORTED IMMEDIATELY

PAYMENT IS DUE 30 DAYS FROM DATE OF INVOICE.

SCHEDULE						ACTUAL BROADCAST							RECONCILIATION					
TU	W	TH	F	SA	SU	TIME	RATE	NO.	DATES	DAY	TIME	TYPE MIN SEC	M/G FOR	PRODUCT/FILM	RATE	DEBIT	CREDIT	REMARKS
X	X	X	X			7A-9A	30.00	5	7/23	MO	818A	30		AFR-1	30.00			
									7/24	TU	743A	30		AFR-1	30.00			
									7/25	WE	810A	30		AFR-1	30.00			
									7/26	TH	853A	30		AFR-1	30.00			
									7/27	FR	810A	30		AFR-1	30.00			
X	X	X	X			1130P-12M	30.00	5	7/23	MO	1158P	30		AFR-1	30.00			
									7/24	TU	1139P	30		AFR-1	30.00			
									7/25	WE	1137P	30		AFR-1	30.00			
									7/26	TH	1200A	30		AFR-1	30.00			
									7/27	FR	1145P	30		AFR-1	30.00			
		X	X			600PM-0700PM	125.00	2	7/26	TH	628P	30		AFR-1	125.00			
									7/27	FR	629P	30		AFR-1	125.00			
		X	X			11-1130P	90.00	2	7/26	TH	1106P	30		AFR-1	90.00			
									7/27	FR	1129P	30		AFR-1	90.00			

v Boys

*Celeste Hadwick
 Mary Heiden*

SCHEDULE COST FOR THIS BILLING PERIOD	ACTUAL GROSS BILLING	AGENCY COMMISSION	PAY THIS AMOUNT	SUB-TOTALS	RECONCILIATION
730.00	7980.00	50199.50	620.50		

VOICE

WE WARRANT THAT THE ACTUAL BROADCAST INFORMATION SHOWN ON THIS INVOICE WAS TAKEN FROM THE PROGRAM LOG.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
National Congressional Club)	MUR 1748
R.E. Carter Wrenn, treasurer)	
Helms for Senate)	
Mark L. Stephens, treasurer)	

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.
2. 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

Date

Marjorie W. Emmons

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

85030504463

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

In the Matter of)
)
National Congressional Club)
R.E. Carter Wrenn, treasurer)
Helms for Senate)
Mark L. Stephens, treasurer)

MUR 1758 NOV 25 P 3: 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

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request 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, 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

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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 General Counsel believes that the issuance of a Subpoena and Order is warranted.

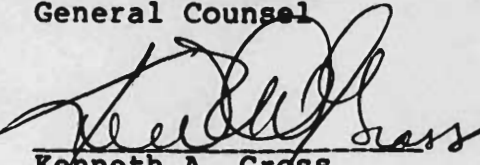
RECOMMENDATIONS

The Office of General Counsel recommends that the Commission:

1. Authorize the attached Order and Subpoena with questions and request for documents to be sent to Jefferson Marketing, Inc.
2. Approve the attached cover letter.

Charles N. Steele
General Counsel

November 20, 1985
Date

BY: 
Kenneth A. Gross
Associate General Counsel

Attachments

1. Order and Subpoena (1)
2. Letter (1)

85030504466

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

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:

Majorie W. Emmons
Secretary to the Commission

Attachment
Questions

86030504467

QUESTIONS TO AND REQUEST FOR DOCUMENTS FROM:

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 advertisement? 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.

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 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. 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.

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- 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

- 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.

86030504469



FEDERAL ELECTION COMMISSION
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:

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

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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

Enclosure
Subpoena and Order
Questions
Request for documents

8 6 0 3 0 5 0 4 4 7 1



FEDERAL ELECTION COMMISSION
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

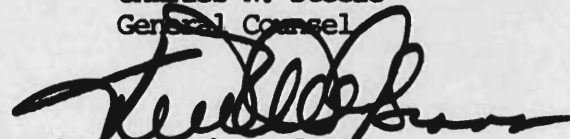
RE: MUR 1748

Dear Mr. Schulder:

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

8 6 0 3 0 5 0 4 4 7 2



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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

Ex 10/20

RE: MUR 1748

Dear Mr. Schulder:

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

R 5 0 3 0 5 0 4 4 7 3

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
National Congressional Club)
R.E. Carter Wrenn, 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 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.
2. 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

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

86030504474

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

95 OCT 21 P 3:42

RECORDED
OFFICE OF THE FEC
COMMISSION SECRETARY

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

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request 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 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. 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 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

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General Counsel believes that the issuance of a Subpoena and Order is warranted.


RECOMMENDATIONS

The Office of General Counsel recommends that the Commission:

1. Decline to grant Jefferson Marketing, Inc. its requested extension of 30 days to respond to the Commission's questions and request for documents.
2. 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

October 18, 1985
Date

BY: 
Kenneth A. Gross
Associate General Counsel

Attachments

1. Request for extension
2. Order and Subpoena (1)
3. Letter (1)

86030604477

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ATTACHMENT 1 ①

COVINGTON & BURLING
1201 PENNSYLVANIA AVENUE, N. W.
P. O. BOX 7566
WASHINGTON, D. C. 20044

TELEPHONE
(202) 662-5462

WRITER'S DIRECT DIAL NUMBER

TWX: 710 822-0006 (CS WSH)
TELEX: 88-593 (COVLING WSH)
TELECOPIER INFORMATION:
(202) 662-6260
CABLE: COVLING

October 15, 1985

K(Err-fid)

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.

Sincerely,



Elliott Schulder

NOV 16 9:13

86030504478

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

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:

Majorie W. Emmons
Secretary to the Commission

Attachment
Questions

86030504479

QUESTIONS TO AND REQUEST FOR DOCUMENTS FROM:

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 advertisement? 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.

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 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. 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.

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- 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

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

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

RE: MUR 1748

Dear Mr. Schulder:

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

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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

Enclosure
Subpoena and Order
Questions
Request for documents

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662# 8723

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

TELEPHONE
(202) 662-5462

WRITER'S DIRECT DIAL NUMBER

TWX: 710 622-0006 (CB WSM)
TELEX: 88-593 (COVING WSM)
TELECOMPAR INFORMATION:
(202) 662-6260
CABLE: COVING

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. 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.

Sincerely,



Elliott Schulder

OCT 16 11 49:13
GENERAL COUNSEL

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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 General Counsel

86030504485



FEDERAL ELECTION COMMISSION

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

86030604485

100-5050

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: 710 622-0005 (CS WSH)
TELEX: 88-523 (COVING WSH)
TELECOPIER INFORMATION:
(202) 662-6280
CABLE: COVING

September 27, 1985

Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

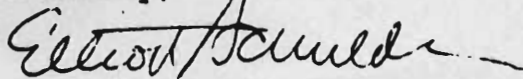
SEP 31 9 49

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

tlm

86030504487

GCC# 8650

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

TELEPHONE
(202) 682-6000

WRITER'S DIRECT DIAL NUMBER

TWX: 710 822-0006 (CB WSM)
TELEX: 89-593 (COVLING WSM)
TELECOPIER INFORMATION:
(202) 682-6280
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

tlm

RECEIVED
GENERAL COUNSEL
15 SEPT 31 4 8: 49

86030504488

COVINGTON & BURLING
11 PENNSYLVANIA AVENUE, N.W.
P.O. BOX 7566
WASHINGTON, D.C. 20044

Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

1 1980-06-01 11:00 AM



FEDERAL ELECTION COMMISSION
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:

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.

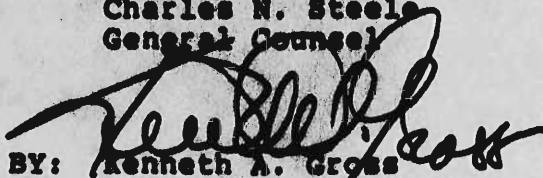
You may consult with an attorney and have an attorney assist you in the preparation of your responses. However, the Commission requests that you submit the information within ten days of your receipt of this letter.

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MUR

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

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W. J. P.

QUESTIONS TO AND REQUEST FOR
DOCUMENTS FROM:

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 advertisement? 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.

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 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. 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.

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- 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

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

Douglas Davidson, President
Jefferson Marketing, Inc.
3825 Barrett Drive
Raleigh, North Carolina 27609

EK 9/13

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 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.

86030504494

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

86030604495

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 September 4, 1985, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1748:

1. Reject the General Counsel's recommendation to issue a subpoena.
2. Direct the General Counsel to seek through 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:
 - a) deletion of questions 1e, 1f, 2e, 2f, and 2 g.
 - b) expansion of question 2d as agreed in the meeting.

(continued)

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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

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

86030504497

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

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RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

GENERAL COUNSEL'S REPORT

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

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so, 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 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

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latest 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 Jefferson Marketing, Inc.

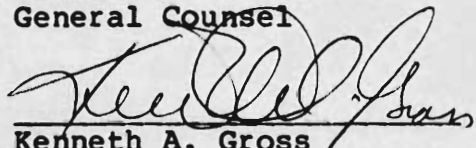
RECOMMENDATIONS

The Office of General Counsel recommends that the Commission:

1. Authorize the attached Order and Subpoena with questions and request for documents to be sent to Jefferson Marketing, Inc.
2. Approve the attached cover letter.

Charles N. Steele
General Counsel

BY:


 Kenneth A. Gross
 Associate General Counsel

Date

August 14, 1985

Attachments

1. Order and Subpoena (1)
2. Letter (1)

86030604500

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

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:

Marjorie W. Emmons
Secretary to the Commission

Attachment
Questions

86030504501

SUBPOENA AND ORDER TO:

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 advertisement? 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

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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. 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.
- 2(g) 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.

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.

86030504503



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.

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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
Subpoena & Order
Questions

86030604505

QCC# 8038

Kleinfield

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

TWX: 710 622-0008 (CB WSH)
TELEX: 88-893 (COVING WSH)
TELECOPIER INFORMATION:
(202) 662-8280
CABLE: COVLING

July 18, 1985

BY HAND

Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
Seventh Floor
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1748

Dear Mr. Gross:

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, 1985, in the above matter.

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

Sincerely,

Elliott Schulder

Enclosures

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RECEIVED
COMMUNICATIONS SECTION

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
THE NATIONAL CONGRESSIONAL CLUB

MUR 1748

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

1. 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.

Yes. Jefferson Marketing, Inc. produced the advertisement, subcontracting the editing to Cinema Sound of Arlington,

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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 to HFS for production of the advertisement.

None. See answer to 1.a.

2. 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' 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?

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.

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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?

NCC has no knowledge of the "profit charged" by the media time buyer.

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.

N/A.

RESPONSE TO 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.

NCC has no such documents in its possession.

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.

NCC has no such documents in its possession.

R. E. Carter Wrenn
R.E. Carter Wrenn

Subscribed and sworn to before me this 17 day of July, 1985.

Virginia D. Anderson
Notary Public

My Commission expires: April 27, 1986

86030604509

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
THE NATIONAL CONGRESSIONAL CLUB

MUR 1748

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

1. 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.

Yes. Jefferson Marketing, Inc. produced the advertisement, subcontracting the editing to Cinema Sound of Arlington,

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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 to HFS for production of the advertisement.

None. See answer to 1.a.

2. 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' 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?

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.

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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?

NCC has no knowledge of the "profit charged" by the media time buyer.

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.

N/A.

RESPONSE TO 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.

NCC has no such documents in its possession.

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.

NCC has no such documents in its possession.

R. E. Carter Wrenn
R.E. Carter Wrenn

Subscribed and sworn to before me this 7 day of July, 1985.

[Signature]
Notary Public

My Commission expires: July 27, 1986

86030504512



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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:

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.

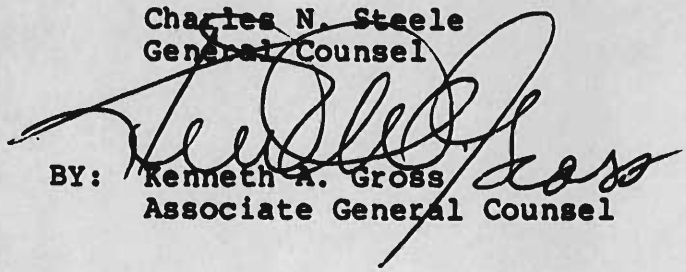
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Elliott Schulder, Esquire
Page 2

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

86030604514

Subpoena and Order to: National Congressional Club

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

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- 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 advertisement? 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.
- 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.

2. 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?

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- 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.

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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.

86030604517

BEFORE THE FEDERAL ELECTION COMMISSION

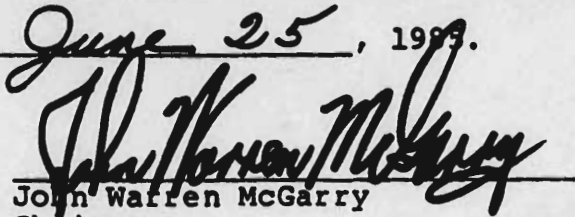
In the Matter of)	
)	
National Congressional Club)	MUR 1748
Carter Wrenn, treasurer)	
Helms for Senate)	
Mark L. Stephens, treasurer)	

**SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS**

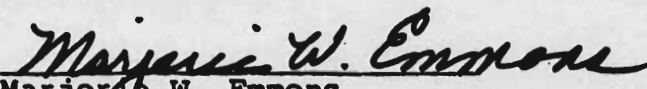
Pursuant to 2 U.S.C. § 437d(a)(1) and (3) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and Subpoenas you to produce requested documents.

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 June 25, 1993.


 John Warren McGarry
 Chairman

ATTEST:


 Marjorie W. Emmons
 Secretary to the Commission

Attachment
Questions

8 6 0 3 0 5 0 4 5 1 8



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

Handwritten initials and date: 6/20

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.

9 6 0 3 0 5 0 4 5 1 9

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

85030604520

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.
3. 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:

6-19-85

Date

Mary W. Dove

Mary W. Dove
Administrative Assistant

86030604521

BEFORE THE FEDERAL ELECTION COMMISSION
RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

In the Matter of)
National Congressional Club)
Carter Wrenn, treasurer)
Helms for Senate)
Mark L. Stephens, treasurer)

MUR 1708 JUN 14 P 4:11

SENSITIVE

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.

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II. LEGAL ANALYSIS

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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investigation in MUR 1792 is broad in scope in order to adequately cover all events which were the subject of the reason to believe determinations in that MUR, the investigation being conducted in MUR 1748 is narrowly tailored to the television commercial, the sole subject of the Commission's reason to believe determinations here. To merge MUR 1748 into MUR 1792 would delay resolution of the former while the latter was being fully investigated.

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:

1. decline to consolidate Matters Under Review 1748 and 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.

Charles N. Steele
General Counsel

June 14, 1985
Date

BY: 
Kenneth A. Gross
Associate General Counsel

Attachments

1. Order and Subpoena (1)
2. Letter (1)

86030604525

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:

Marjorie W. Emmons
Secretary to the Commission

Attachment
Questions

86030504526

Subpoena and Order to: National Congressional Club

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 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 advertisement? 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.
- 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.

2. 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?

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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.

86030504528

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.

R 6 0 3 0 5 0 4 5 2 9



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.

86030504530

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

86030604531



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

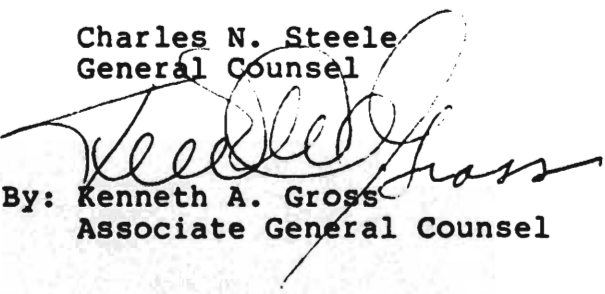
Dear Mr. Bolton:

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

86030604532



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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:

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

86030504533

COVINGTON & BURLING
1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566
WASHINGTON, D. C. 20044

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JAMES H. MCDONALD
EDNEY W. JENNES
COUNSEL

JOHN SHERMAN COOPER
OF COUNSEL

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TELE 60-662 (20 WSH)
TELEOPER (202) 662-6250
CABLE COVING

86030504534
Kleinfeld

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DAVID W. DUMMAR
COWEN K. KUMERMAN
JESOME ACHERMAN
HENRY E. SAUER
JOHN H. SCHERER
ALFRED H. MOSES
JOHN L. BRODIE ELLIOTT
DAVID E. MCDONALD
H. EDWARD GUNDELBERGER, JR.
BRUCE MADDOX CLAGETT
RICHARD P. BRADY
ROBERT C. COONEY
EUGENE L. LAMBERT
MARY A. WEISS
HARVEY H. GILBERT
MICHAEL S. HORN
CHARLES T. C. RUFF
MICHAEL S. BURNETT
BINGHAM L. EVERICH
ALLAN TOPOL
VIRGINIA G. WATKIN
RICHARD S. COFARIEN
CHARLES L. IYER
PETER E. TROGDOFF
WILEY S. WILLIAMS, JR.
DORIS D. BLAVER
WILLIAM D. IVERSON
S. WILLIAM LIVINGSTON, JR.
JAMES D. ATWOOD
COLLEMAN S. NICKS
STUART C. STOCK
EUGENE D. GULLAND
O. THOMAS JOHNSON, JR.
EUGENE A. LUDWIG
PATRICIA A. BRADY
REYES C. VERTSBOEK
THEODORE VOORHEES, JR.
JEFFREY S. HUVELLE
PAUL J. BERMAN
WILLIAM A. SKINNER

HARRY L. SMUNDERMAN
EDWIN L. GOMER
JAMES C. JOSEY
JOHN W. BULLOCK
MARK TON BROTHERS
A. BARNETT, JR.
ROBERT H. COHEN
EDWARD V. CLARK, JR.
WILLIAM H. ALLEN
DAVID B. BRILL
JOHN A. JONES, JR.
PAUL R. STANSBURY
PHILIP S. STANSBURY
CHARLES A. MILLER
PETER BOSTON HUTT
JOHN W. HARTMAN
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HARVEY WINSTON
LEWIS A. BURNETT
PETER J. NICKLES
JONATHAN S. BLAKE
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ROBERT C. BRYAN
E. EDWARD BRUCE
DAVID H. BRUCE
PAUL T. YAMAMOTO
ANDREW W. RINDER
DAVID H. NICHMAN
RUSSELL M. GARDNER, JR.
NICHOLAS W. FELS
THEODORE L. GARRETT
DANA T. ACHENLY
JOHN T. WINE
JOHN THOMAS SMITH II
JOHN R. RUFF
CLAUDEN ELY, JR.
RICHARD F. KINGHAM
ROBERT M. SUESSMAN
MICHAEL S. LEVY
GEORGE S. REID, JR.
THOMAS S. WILLIAMSON, JR.
JOHN R. BOLTON
JOANNE S. GROSSMAN

July 2, 1985

86030504534

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
John R. Bolton

15 JUL 2 12:00
RECEIVED
OFFICE OF THE
GENERAL COUNSEL

GC#7903
Kreinfield

COVINGTON & BURLING
1201 PENNSYLVANIA AVENUE, N. W.
P. O. BOX 7566
WASHINGTON, D. C. 20044

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WRITER'S DIRECT DIAL NUMBER
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JOHN T. SAFERBA
JAMES H. MCELLOTHLIN
ERNEST W. JENNES
COUNSEL
—
JOHN SHERMAN COOPER
OF COUNSEL

TWR 710 662-0005 (CS WSH)
TELEX 88-883 COVING WSH)
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DANIEL M. GIBSON
STANLEY L. THOMAS
DON V. LAMAR
WILLIAM S. ... JR.
WALTER M. ...
EDWIN M. ...
JAMES A. ...
HENRY H. ...
ALFRED ...
DAVID ...
H. ...
BRUCE ...
RICHARD ...
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CLAVER ...
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MICHAEL ...
GEORGE ...
THOMAS ...
JOHN ...
JOANNE ...

July 2, 1985

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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:

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Sincerely yours,
John R Bolton
John R. Bolton

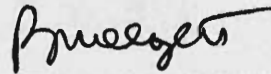
RECEIVED
GENERAL COUNSEL
15 JUL 2 12:00

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,



Brice M. Clagett
John R. Bolton
Elliott Schulder

86030604537



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

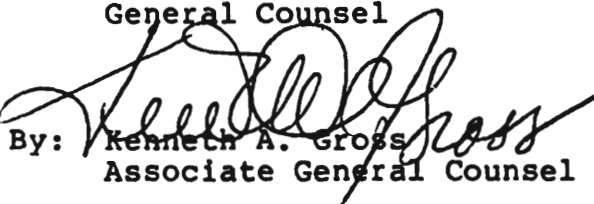
Dear Mr. Schulder:

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


By: Kenneth A. Gross
Associate General Counsel

86030604538



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:

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

By: Kenneth A. Gross
Associate General Counsel

86030604539

BCC# 7398
Kleinfeld

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

7 All: 36

TELEPHONE
(202) 662-6000

WRITER'S DIRECT DIAL NUMBER

(202) 662-5462

TWX: 710 622-0008 (CB WSH)
TELEX: 88-883 (COVLING WSH)
TELECOPIER INFORMATION:
(202) 662-6260
CABLE: COVLING

4/25

May 7, 1985

BY HAND

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

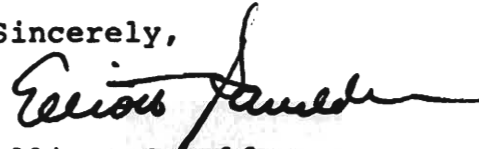
Re: MUR 1748

Dear Mr. Kleinfeld:

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

36030504540

BCC# 7398
Kleinfeld

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

RECEIVED
MAY 7 1985

All: 36

TELEPHONE
(202) 662-6000

WRITER'S DIRECT DIAL NUMBER

(202) 662-5462

TWX: 710 622-0005 (CB WSH)
TELEX: 69-593 (COVLING WSH)
TELECOPIER INFORMATION:
(202) 662-6260
CABLE: COVLING

May 7, 1985

BY HAND

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

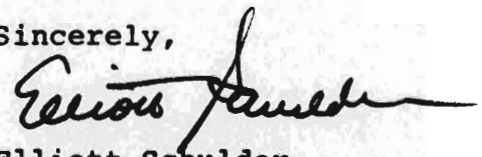
Re: MUR 1748

Dear Mr. Kleinfeld:

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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

86030604541

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

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7 14 33

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

BY HAND

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
National Congressional Club) MUR 1748
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).
2. 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)

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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

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION
COMMUNICATIONS SECRETARY

In the Matter of)
)
)
National Congressional Club)
R.E. Carter Wrenn, as treasurer)
Helms for Senate)
Mark L. Stephens, as treasurer)

MUR 1748

APR 11 11:39

GENERAL COUNSEL'S REPORT

I. BACKGROUND

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

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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 ANALYSIS**

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**

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During 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.

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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

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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.

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§ 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. RECOMMENDATIONS

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).

2. 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).

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 attached letters.

April 10, 1985
Date

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Assistant General Counsel

Attachments

- I. NCC's response
- II. Proposed Letters

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ATTACHMENT I = 135
COVINGTON & BURLING
1201 PENNSYLVANIA AVENUE, N. W.
P. O. BOX 7566
WASHINGTON, D. C. 20044

MUR 1748
Johansen ①

TWX: 710 622-0005 (CB WSH)
TELE: 662-6623 (COVLING WSH)
TELECOPIER INFORMATION:
(202) 662-6660
CABLE: COVLING

January 16, 1985

TELEPHONE
(202) 662-6000

WRITER'S DIRECT DIAL NUMBER

(202) 662-5344

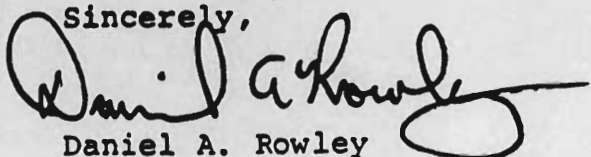
HAND DELIVER

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

Re: MUR 1748

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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5:05 PM

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 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 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.

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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.

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 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;

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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:

<u>STATION</u>	<u>MARKET</u>	<u>DATES</u>	<u>COST</u>	<u>N.C. PENETRATION</u>
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 EFS's September 10, 1984, response to the complaint, NCC and EFS 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 EFS 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

Carter Wrenn
R. E. Carter Wrenn

Sworn and subscribed to before me this 14 day of January, 1985.

Vigie L. Anderson
Notary Public

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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 , 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.

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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
Procedures

86030604560



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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:

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.

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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.

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Sincerely,

John Warren McGarry
Chairman

Enclosure
Procedures

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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:

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 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.

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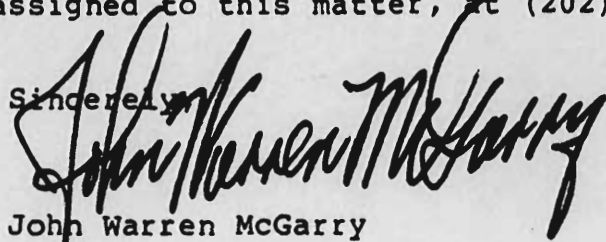
John Bolton, Esquire
Page 2

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,



John Warren McGarry
Chairman

Enclosure
Procedures

86030504564



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. § 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.

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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
Procedures

86030604566

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

GCO#
6433

TELEPHONE
(202) 662-6000

WRITER'S DIRECT DIAL NUMBER

(202) 662-5344

January 16, 1985

TWX: 710 662-0005 (CB WSH)
TELEX: 66-663 (COVLING WSH)
TELECOPIER INFORMATION:
(202) 662-6280
CABLE: COVLING

HAND DELIVER

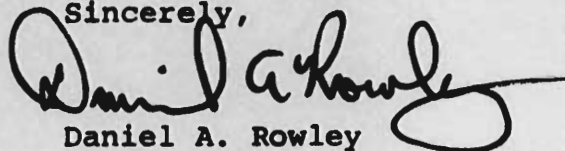
Gary Johansen, Esq.
Federal Election Commission
1325 K Street, N.W.
7th Floor
Washington, D.C. 20463

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

86030604567

10:50 AM

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 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 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.

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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.

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 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;

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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 HFS.

Answer: NCC aired the commercial in the following cities outside North Carolina:

<u>STATION</u>	<u>MARKET</u>	<u>DATES</u>	<u>COST</u>	<u>N.C. PENETRATION</u>
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.

* * *

86030604570

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

R. E. Carter Wrenn
R. E. Carter Wrenn

Sworn and subscribed to before me this 14 day of January, 1985.

Virgie D. Anderson
Notary Public

86030504571



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 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 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.

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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.

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 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;

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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 HFS.

Answer: NCC aired the commercial in the following cities outside North Carolina:

<u>STATION</u>	<u>MARKET</u>	<u>DATES</u>	<u>COST</u>	<u>N.C. PENETRATION</u>
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.

* * *

86030504574

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

R. E. Carter Wrenn
R. E. Carter Wrenn

Sworn and subscribed to before me this 14 day of January, 1985.

Ugoe A. Anderson
Notary Public

86030604575

GCC# 627A

COVINGTON & BURLING
1201 PENNSYLVANIA AVENUE, N. W.
P. O. BOX 7566
WASHINGTON, D. C. 20044

TELEPHONE
(202) 662-6000

WRITER'S DIRECT DIAL NUMBER

January 7, 1985

TWX: 710 822-0008 (CB WSH)
TELEX: 88-883 (COVLING WSH)
TELECOMER INFORMATION:
(202) 662-6280
CABLE: COVLING

(202) 662-5344

HAND DELIVER

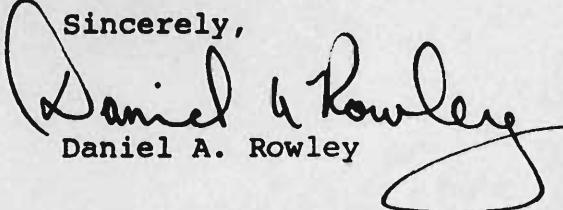
Gary Johansen, Esq.
Federal Election Commission
1325 K Street
7th Floor
Washington, D.C. 20463

Re: MUR 1748

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

86030604576

15 JAN 7 5:27

COVINGTON & BURLING

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 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 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.

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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.

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 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;

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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 HFS.

Answer: NCC aired the commercial in the following cities outside North Carolina:

<u>STATION</u>	<u>MARKET</u>	<u>DATES</u>	<u>COST</u>	<u>N.C. PENETRATION</u>
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.

* * *

R 6 0 3 0 6 0 4 5 7 9

Under penalty of perjury, I declare that the foregoing response is accurate and true to the best of my knowledge and belief.

Date: _____

R. E. Carter Wrenn

Sworn and subscribed to before me this ____ day of January, 1985.

Notary Public

86030604580

8 6 0 3 0 6 0 4 5 8

FIRST CLASS

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.W.
7th Floor
Washington, D.C. 20463

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N.W.

P.O. BOX 7566

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:

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

8 6 0 3 0 5 0 4 5 8 2

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
National Congressional Club and) MUR 1748
Carter Wrenn, as treasurer)
Helms for Senate and)
Mark L. Stephens, as treasurer)

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:

1. Find reason to believe that the National Congressional Club and Carter Wrenn, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).
2. 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:

11-30-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

86030504583



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:

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.

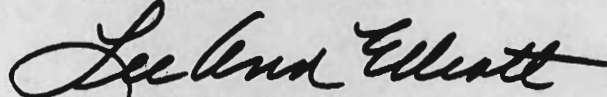
The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against your client, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

86030504584

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

86030504585

Questions to National 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

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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 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 the National Congressional Club and Helms for Senate.

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ATTACHMENT A

HELMS TV AD (30 sec)-ABZUG/JACKSON/REAGAN

VIDEO

HELLA ABZUG SPEAKING
ON TELEVISION.

SUPER: HELLA ABZUG
RADICAL FEMINIST
[HELMS TURNS TV CHANNEL]

JESSE JACKSON SPEAKING
ON TELEVISION. SUPER:
JESSE JACKSON RADICAL
ACTIVIST
[HELMS TURNS OFF TV]

HELMS 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

ABZUG: THERE'S ONLY ONE WAY FOR YOU
TO MOVE, MR. REAGAN, AND THAT
IS TO MOVE OUT.

JACKSON: TO THE WHITE HOUSE, WE WILL
MARCH ON, MARCH ON

HELMS: YOU KNOW, NIGHT AFTER NIGHT THE
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.

ALL AMERICANS SHOULD SUPPORT
OUR PRESIDENT.

ANNCR: AMERICANS FOR REAGAN. A CAMPAIGN
OF THE NATIONAL CONGRESSIONAL CLUB.

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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:

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.

86030604589

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

86030504590

LLA
12/3/84

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
THE FEC
SECRETARY

In the Matter of)	
National Congressional Club and)	MUR 1748
Carter Wrenn, as treasurer)	
Helms for Senate and)	
Mark L. Stephens, as treasurer)	

24 NOV 14 All: 37

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. § 441a(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.

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On September 10 and 11, 1984, Respondents submitted their response which included an affidavit by Carter Wrenn (Attachment II).

II. FACTUAL AND LEGAL ANALYSIS

Complainant states that on July 20, 1984, NCC and the Helms Committee began airing a 30-second television advertisement in which Senator Helms appears speaking on behalf of President Reagan. The advertisement begins by showing Bella Abzug and then Jesse Jackson speaking as they appeared on television. A hand reaches in and turns the television set off and the camera pulls back showing Senator Helms sitting at his desk. Senator Helms then speaks urging Americans to support President Reagan. While speaking he is identified to the viewer by a superimposed statement reading, "U.S. Senator Jesse Helms." As Senator Helms finishes speaking a picture of President Reagan is shown. An announcer then identifies the advertisement as a campaign of the NCC and a superimposed message appears indicating that the advertisement is paid for by NCC and the Helms Committee and is not authorized by President Reagan or his committee.

Complainant asserts that Senator Helms has a continuous visual and vocal presence in the advertisement and that the focus of the advertisement is on Senator Helms.

Complainant states that the television advertisement is being aired 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.

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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

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advertisement was previously booked by the Helms Committee.

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 on a 50/50 basis, each paying \$30,502.50.

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 advertisement.

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

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contribution. 2 U.S.C. § 441a(a)(7)(B)(i) provides that expenditures made by any person in cooperation with a candidate or his campaign committee shall be considered to be a contribution to such committee.

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.

^{1/} 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 Reagan^{3/}, 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.

^{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.

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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. § 441a(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. § 441a(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. § 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 attached letter to respondents.

Charles N. Steele
General Counsel

Nov. 13, 1984
Date

By:

Kenneth A. Gross
Associate General Counsel

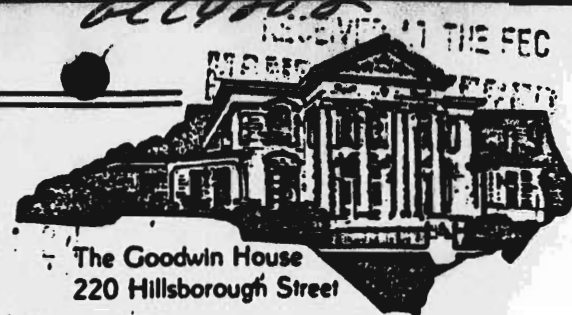
Attachments:

- I. Complaint
- II. Response from NCC and the Helms Committee
- III. Letter and Questions

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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

Tape in Docket

MUR

1748

ATTACHMENT

I ①

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

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

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Page Two

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 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

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Mr. Charles N. Steele
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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 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

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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. 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).

Allocation 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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Page Five

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. 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.

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Mr. Charles N. 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 26th day
of July, 1984.


Notary Public

My Commission Expires: Feb 25, 1985

86030604604

7

HELMS TV AD (30 sec)-ABZUG/JACKSON/REAGAN

VIDEO
BELLA ABZUG SPEAKING
ON TELEVISION.
SUPER: BELLA ABZUG
RADICAL FEMINIST
[HELMS TURNS TV CHANNEL]

AUDIO
ABZUG: THERE'S ONLY ONE WAY FOR YOU
TO MOVE, MR. REAGAN, AND THAT
IS TO MOVE OUT.

JESSE JACKSON SPEAKING
ON TELEVISION. SUPER:
JESSE JACKSON RADICAL
ACTIVIST
[HELMS TURNS OFF TV]

JACKSON: TO THE WHITE HOUSE, WE WILL
MARCH ON, MARCH ON

HELMS AT DESK.
SUPER: U.S. SEN JESSE HELMS

HELMS: YOU KNOW, NIGHT AFTER NIGHT THE
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.

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 CLUB.

86030504605

8

Under the dome



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.

In the commercial, Helms tells

See DOME, page 6A

Under the dome



Continued from page 1A

viewers that the liberal news 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 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.

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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.

86030504607

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO. 11166	2623
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

ENDOR WRAL - TV
2619 Western Blvd.
Raleigh, NC. 27605

SHIP TO

10

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.

ORDER DATE	DATE REQUIRED	JOB NUMBER	JOB	PROOF REQUIRED		NO OF SAMPLES REQUIRED	ACCOUNT
7-18-84	7-18-84			Y	N		HFS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL
86030604608		To purchase :30 television time for Helms for Senate Committee. Ads to be announced Ads to run Fri. July 20 - Thur. July 27, 1984 * M-F 7-9a Good Morning America Mon. 9-cc Baseball Tue. 8-10p Movie "Nadia"				10 @ 225	2250.00
							800.00
							900.00
						gross	3950.00
						less 15%	592.50
						net	\$3357.50
Advertising/Hawley - HFS - TV Purchase CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED * TWO SPOTS TO RUN 7/20/84 IN 7-9A MOVED TO PURCHASE ORDER # 11110 TO RUN IN APR-1.							

CHANGES WILL BE BINDING ON CLIENT LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

Quinn Koontz
PURCHASING AGENT



AGREEMENT FORM FOR POLITICAL BROADCASTS



STATION and LOCATION WRAL-TV, Raleigh, N.C. 7/18 19 84
 WE Jefferson Marketing, Inc. (being) U.S. Senator Jesse Helms
 x Jefferson Marketing, Inc. (on behalf of)

a legally qualified candidate of the Republican political party for the office of
United States Senate

in the _____ election to be held on November, 1984 do hereby request station time as follows:

LENGTH OF BROADCAST HOUR DAYS TIMES PER WEEK TOTAL NO. WEEKS RATE

9
6
0
6
4
0
5
0
3
0
6
0
8

DATE OF FIRST BROADCAST <u>July 20, 1984</u>	DATE OF LAST BROADCAST <u>July 27, 1984</u>
---	--

Total Charges: \$3,357.50

The broadcast time will be used by _____
 I represent that the advance payment for the above-described broadcast time has been furnished by
Helms for Senate Committee / National Congressional Club

_____ and you are authorized to so describe that sponsor in your log and to announce the program as paid for by such person or entity. The entity furnishing the payment, if other than an individual person, is: () a corporation; () a committee; () an association; or () other unincorporated group. The names and offices of the chief executive officers of the entity are:
Mark Stephens, Treasurer / Carter Wrenn - Treasurer

It is my understanding that: If the time is to be used by the candidate himself within 45 days of a primary or primary runoff election, or within 60 days of a general or special election, the above charges represent the lowest unit charge of the station for the same class and amount of time for the same period; where the use is by a person or entity other than the candidate or is by the candidate but outside the aforementioned 45 or 60 day periods, the above charges do not exceed the charges made for comparable use of such station by other users.

It is agreed that use of the station for the above-stated purposes will be governed by the Communications Act of 1934, as amended, and the FCC's rules and regulations, particularly those provisions reprinted on the back hereof, which I have read and understand. I further agree to indemnify and hold harmless the station for any damages or liability that may ensue from the performance of the above-stated broadcasts. For the above-stated broadcasts I also agree to prepare a script or transcription, which will be delivered to the station at least _____ before the time of the scheduled broadcasts; (note: the two preceding sentences are not applicable if the candidate is personally using the time).

Date: 7/15/84 Susan Miller
 (Candidate, Supporter or Agent)

Accepted)
 Rejected) by _____ Title _____
Jefferson Marketing, Inc.

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).

12

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27619

No 6214

06-30
531

July 18, 1984

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 P. Holding

0
⑆00006214⑆ 405310030010861143935⑆

DETACH AND RETAIN THIS STATEMENT

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW. IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

JEFFERSON MARKETING INC.

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

860305

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO. 11110	3045
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

VENDOR WRAL - TV
2619 Western Blvd.
Raleigh, N.C. 27605

SHIP TO

13

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 TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

CHASE ORDER DATE	DATE REQUIRED	JOB NUMBER	FOB	PROOF REQUIRED		NO. OF SAMPLES REQUIRED	ACCOUNT
-16-84	7-16-84			BY	NO		HFS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL
86030504611		To purchase television time for Helms for Senate Committee. AFR-1 "Defending Reagan" :30 Ads to run Mon. July 23 - Fri. July 27, 1984 M-F 7-9a Good Morning America less 15% net				5 @ 225.	1125.00 168,75 \$ 956.25
Advertising/Hawley - HFS/AFR - TV Purchase <u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>							

CHANGES WILL BE BINDING ON CLIENT, LISTED ON THIS PURCHASE ORDER UNLESS WRITTEN AUTHORIZATION IS GIVEN.

L. Hawley *RPH* *P. Jones*
PURCHASING AGENT

14



AGREEMENT FORM FOR POLITICAL BROADCASTS

STATION and LOCATION WRAL-TV Raleigh, N.C. 1984
 WE Jefferson Marketing, Inc. (being) U.S. Senator Jesse Helms
 X (on behalf of)

a legally qualified candidate of the Republican political party for the office of United States Senate

in the _____ election to be held on November, 1984 do hereby request station time as follows:

LENGTH OF BROADCAST HOUR DAYS TIMES PER WEEK TOTAL NO. WEEKS RATE

2
1
6
4
0

DATE OF FIRST BROADCAST <u>July 23</u>	DATE OF LAST BROADCAST <u>July 27</u>
---	--

Total Charges: \$956.25

The broadcast time will be used by _____
 I represent that the advance payment for the above-described broadcast time has been furnished by
Helms for Senate Committee / National Congressional Club

and you are authorized to so describe that sponsor in your log and to announce the program as paid for by such person or entity. The entity furnishing the payment, if other than an individual person, is: () a corporation; () a committee; () an association; or () other unincorporated group.
 The names and offices of the chief executive officers of the entity are:

Mark Stephens, Treasurer / Carter Wrenn, Treasurer

It is my understanding that: If the time is to be used by the candidate himself within 45 days of a primary or primary runoff election, or within 60 days of a general or special election, the above charges represent the lowest unit charge of the station for the same class and amount of time for the same period; where the use is by a person or entity other than the candidate or is by the candidate but outside the aforementioned 45 or 60 day periods, the above charges do not exceed the charges made for comparable use of such station by other users.

It is agreed that use of the station for the above-stated purposes will be governed by the Communications Act of 1934, as amended, and the FCC's rules and regulations, particularly those provisions reprinted on the back hereof, which I have read and understand. I further agree to indemnify and hold harmless the station for any damages or liability that may ensue from the performance of the above-stated broadcasts. For the above-stated broadcasts I also agree to prepare a script or transcription, which will be delivered to the station at least _____ before the time of the scheduled broadcasts; (note: the two preceding sentences are not applicable if the candidate is personally using the time).

Date: 7/18/84 Jesse Helms
 (Candidate, Supporter or Agent)

Accepted)
 Rejected) by _____ Title _____
Jefferson Marketing, Inc.

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).

15

JEFFERSON MARKETING INC.
P. O. BOX 19807
RALEIGH, N. C. 27619

No 6160

86-30
531

July 18, 19 84

AY TO THE
ORDER OF

WRAL - TV

\$ 956.25

THE SUM 956 DOLS 25 CTS

DOLLARS

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

Robert P. Holding III

⑈00006160⑈ ⑆053100300⑆0861143935⑈

DETACH AND RETAIN THIS STATEMENT

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW. IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

JEFFERSON MARKETING INC.

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



AGREEMENT FORM FOR POLITICAL BROADCASTS

STATION and LOCATION WXII-TV Winston Salem, N.C. 10 84
WE Jefferson Marketing, Inc. (being) U.S. Senator Jesse Helms
(on behalf of)

a legally qualified candidate of the Republican political party for the office of United States Senate

in the _____ election to be held on November, 1984 do hereby request station time as follows:

LENGTH OF BROADCAST HOUR DAYS TIMES PER WEEK TOTAL NO. WEEKS RATE

86030504614

DATE OF FIRST BROADCAST <u>July 20, 1984</u>	DATE OF LAST BROADCAST <u>July 27, 1984</u>	Total Charges: <u>\$2,465.00</u>
---	--	----------------------------------

The broadcast time will be used by _____
I represent that the advance payment for the above-described broadcast time has been furnished by Helms for Senate Committee / National Congressional Club

_____ and you are authorized to so describe that sponsor in your log and to announce the program as paid for by such person or entity. The entity furnishing the payment, if other than an individual person, is: () a corporation; () a committee; () an association; or () other unincorporated group. The names and offices of the chief executive officers of the entity are: Mark Stephens, Treasurer / Carter Wrenn, Treasurer

It is my understanding that: If the time is to be used by the candidate himself within 45 days of a primary or primary runoff election, or within 60 days of a general or special election, the above charges represent the lowest unit charge of the station for the same class and amount of time for the same period; where the use is by a person or entity other than the candidate or is by the candidate but outside the aforementioned 45 or 60 day periods, the above charges do not exceed the charges made for comparable use of such station by other users.

It is agreed that use of the station for the above-stated purposes will be governed by the Communications Act of 1934, as amended, and the FCC's rules and regulations, particularly those provisions reprinted on the back hereof, which I have read and understand. I further agree to indemnify and hold harmless the station for any damages or liability that may ensue from the performance of the above-stated broadcasts. For the above-stated broadcasts I also agree to prepare a script or transcription, which will be delivered to the station at least _____ before the time of the scheduled broadcasts; (note: the two preceding sentences are not applicable if the candidate is personally using the time).

Date: 7/19/84 Susan Miller
(Candidate, Supporter or Agent)

Accepted } by Raymond H. Coley Title V.P., J.M.
Rejected }

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).

VENDOR WXII - TV
 700 Coliseum Dr.
 Winston Salem, N.C. 27101

SHIP TO

17

Attention: Zack 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 SOLE RESPONSIBLE FOR THE PAYMENT OF ANY INVOICE ARISING OUT OF THIS PURCHASE ORDER.
 MAIL INVOICE IN TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT.

PURCHASE ORDER DATE	DATE REQUIRED	JOB NUMBER	FOR	PROOF REQUIRED	NO OF SAMPLES REQUIRED	ACCOUNT
7-18-84	7-18-84					HFS

860305014515

QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
		To purchase :30 television time for Helms for Senate Committee/Americans for Reagan		
		AFR-1 "Defending Reagan"		
		Ads to run Fri. July 20 - Sun. July 22, 1984		
		Sat. 1-6p Major League Baseball		300.00
		Sat. 11-11:30p Late News		225.00
		Sun. 12:30-1p Meet the Press		100.00
		Sun. 2-6p Michigan		200.00
		Sun. 6-6:30 Early News		350.00
		Sun. 11-11:30p Late News		225.00
			gross	1500.00
			less 15%	225.00
			net	\$1275.00

P.O. Incorrect
 Should be as follows

Advertising/Dawson - HFS/AFR - Television Purchase

CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED

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

R.H.E. Miller *D. Jones*
 PURCHASING AGENT

ORIGINAL

THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE

18

VENDOR

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

SHIP TO

Attention: Zack 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 FORWARDING TO CLIENT.

PURCHASE ORDER DATE		DATE REQUIRED	JOB NUMBER	P.O. #	PROOF REQUIRED		NO OF SAMPLES REQUIRED	ACCOUNT
7-16-84		7-16-84			Y	N		HFS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW					UNIT PRICE	TOTAL
		To purchase television time for Helms for Senate Committee. AFR-1 "Defending Reagan" :30 Ads to run Mon. July 23 - Fri. July 27, 1984 M-F 7-9a Today Show 5 @ 50 = 250.00 Th, F 6p News 2 @ 350 = 700.00 Tg, F 11p News 2 @ 225 = 450.00						
		gross						1400.00
		less 15 %						210.00
		net						\$1190.00
Advertising/Dawson - HFS/AFR - TV Purchase <u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>								

86030604615

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

S. Miller RPH
Purchasing Agent

19

July 18, 19 84

PAY TO THE ORDER OF WXII - TV

\$ 1190.00

THE SUM T 190 DOLS 00 CTS

DOLLARS

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

Robert P. Holding

⑆00006152⑆ ⑆053100300⑆0861143935⑆

DETACH AND RETAIN THIS STATEMENT

THE ATTACHED CHECK IS IN PAYMENT OF THE DEBIT DESCRIBED BELOW. IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT REQUIRED.

JEFFERSON MARKETING INC.

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DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11108 - To purchase TV time for Helms for Senate. RECEIPT & AFFIDAVIT REQUESTED	\$1190.00

20

66-30
331

July 18, 19 84

PAY TO THE ORDER OF WXII - TV \$ 1275.00

THE SUM I 275 DOLS 00 CTS

DOLLARS

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

Robert P. Holding

⑆00006208⑈⑆053100300⑆0861143935⑈

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF THE AMOUNTS RECEIVED BELOW. IF YOU CORRECTLY PLEASE ADVISE US PROMPTLY. NO RECEIPT DESIRED.

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
8 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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/



AGREEMENT FORM FOR POLITICAL BROADCASTS

STATION and LOCATION WGHP-TV High Point, N.C. 1084
WE Jefferson Marketing, Inc. (being) U.S. Senator Jesse Helms
x (on behalf of)

a legally qualified candidate of the Republican political party for the office of United States Senate

in the _____ election to be held on November, 1984 do hereby request station time as follows:

LENGTH OF BROADCAST HOUR DATE TIMES PER WEEK TOTAL NO. WEEKS RATE

DATE OF FIRST BROADCAST	DATE OF LAST BROADCAST
July 20, 1984	July 27, 1984

Total Charges: \$3,230.00

The broadcast time will be used by _____
I represent that the advance payment for the above-described broadcast time has been furnished by Helms for Senate Committee / National Congressional Club

_____ and you are authorized to so describe that sponsor in your log and to announce the program as paid for by such person or entity. The entity furnishing the payment, if other than an individual person, is: () a corporation; () a committee; () an association; or () other unincorporated group. The names and offices of the chief executive officers of the entity are: Mark Stephens, Treasurer / Carter Wrenn, Treasurer

It is my understanding that: If the time is to be used by the candidate himself within 45 days of a primary or primary runoff election, or within 60 days of a general or special election, the above charges represent the lowest unit charge of the station for the same class and amount of time for the same period; where the use is by a person or entity other than the candidate or is by the candidate but outside the aforementioned 45 or 60 day periods, the above charges do not exceed the charges made for comparable use of such station by other users.

It is agreed that use of the station for the above-stated purposes will be governed by the Communications Act of 1934, as amended, and the FCC's rules and regulations, particularly those provisions reprinted on the back hereof, which I have read and understand. I further agree to indemnify and hold harmless the station for any damages or liability that may ensue from the performance of the above-stated broadcasts. For the above-stated broadcasts I also agree to prepare a script or transcription, which will be delivered to the station at least _____ before the time of the scheduled broadcasts; (note: the two preceding sentences are not applicable if the candidate is personally using the time).

Date: 7/18/84 Susan Miller
(Candidate, Supporter or Agent)

Accepted)
Rejected) by _____ Title _____
Jefferson Marketing, Inc.

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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JEFFERSON MARKETING, INC.

P.O. BOX 19807 • RALEIGH, N.C. 27619

PURCHASE ORDER

NO. 11165

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

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

SHIP TO

Attention: Charlie Davis

22

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 DATE	DATE REQUIRED	JOB NUMBER	FOB	PAID REQUIRED	ACCOUNT
7-18-84	7-18-84				HFS

QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
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86030504520

TO purchase :30 television time for Helms for Senate Committee/Americans for Reagan

AFR-1 "Defending Reagan"

Ads to run Fri. July 20 - Sun. July 22, 1984

Sun.	6-6:30p	TV Eyewitness News		200.00
Fri.	6-6:30p	TV Eyewitness News		425.00
Sat/Sun	12-2p	Birtish Open	2 @ 325	650.00
Sun.	4-6p	Aspen Tennis		350.00

gross 1625.00

less 15% 243.75

net \$1381.25

Advertising/Miller - HFS/AFR - TV Purchase

CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED

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

R. S. Miller
PURCHASING AGENT

JEFFERSON MARKETING
P. O. BOX 19607
RALEIGH
S. MILLER

NC 27619

(herein referred to as "station")

23

Contract No. 26902 Agency YES Client No. 831799 Date Entered 07-20-84 Amendment Date _____ Advertiser LOCAL REG LUC STD Billing POL 7002 Station WGHP-TV AMER. FOR REG/HELMS 8 Product R-CAND/P & S Start Date 07-20-84 End Date 07-22-84

Line	Start Date	End Date	Length	Description	Calendar	Spots/Week	Rate
1	07-20-84	07-20-84	30	1-F** 600-7 AM		JL	20
2	07-20-84	07-20-84	30	1-F 12N-1230P		A4	75
3	07-21-84	07-21-84	30	SAT 12M-1AM		ZK	30
4	07-22-84	07-22-84	30	SUN 7A-1030A		S1	30

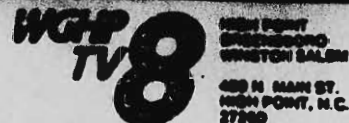
86030504621

January February March April May June July August September October November December Contract To 185.

Agency: JEFFERSON MARKETING Representative _____ Advertiser: AMER. FOR REG/HELMS 8 As Agent for _____ by _____ Television Station WGHP-TV As Agent for _____ by _____

The terms and conditions on the reverse side of this page and any attachments hereto are an integral

Contract Between
 Station WGHP-TV



JEFFERSON MARKETING
 P. O. BOX 14807
 RALEIGH
 LINDA GILLEN

(herein referred to as "station")

24

Order No. 5901 Agency YES Client No. H31799 Date Entered 07-14-84 Amendment Date 07-24-84 Advertiser AMER. FOR REG/HELMS S Ad. No. H-CARD/U.S. SENATE/A Product H-CARD/U.S. SENATE/A Station WGHP-TV Salesman PDL 7002 Start Date 07-20-84 End Date 07-22-84

Order	Start Date	End Date	Length	Description	Calendar	Rate	Class	Plan	Makegood For
NO.			MM:SS		M T W T F S S				Date
5	07-20-84	07-20-84	30	M-F 6-7PM		425	EN		
	07-22-84	07-22-84	30	SUN 5-530PM		200	XP		
	07-21-84	07-21-84	30	SA/SU 1200A0200P		325	GF		
	07-22-84	07-22-84	30	SA/SU 1000A0130P		325	GF		
	07-22-84	07-22-84	30	SUN 5-6PM/1		350	SA		

86030504622

January | February | March | April | May | June | July | August | September | October | November | December | Contract Total 1,625.00

Agency: JEFFERSON MARKETING
 Representative: LINDA GILLEN
 Advertiser: AMER. FOR REG/HFLMS 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 part of this agreement. The station shall not be bound by any terms or conditions not contained herein.



AGREEMENT FORM FOR POLITICAL BROADCASTS

25

STATION and LOCATION WFMY-TV Greensboro, N.C. 10 84
 WE Jefferson Marketing, Inc. (being) U.S. Senator Jesse Helms
 (on-behalf of)

a legally qualified candidate of the Republican political party for the office of United States Senate

in the _____ election to be held on November, 1984 do hereby request station time as follows:

LENGTH OF BROADCAST HOUR DAYS TIMES PER WEEK TOTAL NO. WEEKS RATE

DATE OF FIRST BROADCAST <u>July 20</u>	DATE OF LAST BROADCAST <u>JULY 22</u>	Total Charges: <u>\$459.00 net</u>
---	--	------------------------------------

The broadcast time will be used by _____
 I represent that the advance payment for the above-described broadcast time has been furnished by Helms for Senate Committee / National Congressional Club

_____ and you are authorized to so describe that sponsor in your log and to announce the program as paid for by such person or entity. The entity furnishing the payment, if other than an individual person, is: () a corporation; () a committee; () an association; or () other unincorporated group. The names and offices of the chief executive officers of the entity are: Mark Stephens, Treasurer / Carter Wrenn, Treasurer

It is my understanding that: If the time is to be used by the candidate himself within 45 days of a primary or primary runoff election, or within 60 days of a general or special election, the above charges represent the lowest unit charge of the station for the same class and amount of time for the same period; where the use is by a person or entity other than the candidate or is by the candidate but outside the aforementioned 45 or 60 day periods, the above charges do not exceed the charges made for comparable use of such station by other users.

It is agreed that use of the station for the above-stated purposes will be governed by the Communications Act of 1934, as amended, and the FCC's rules and regulations, particularly those provisions reprinted on the back hereof, which I have read and understand. I further agree to indemnify and hold harmless the station for any damages or liability that may ensue from the performance of the above-stated broadcasts. For the above-stated broadcasts I also agree to prepare a script or transcription, which will be delivered to the station at least _____ before the time of the scheduled broadcasts; (note: the two preceding sentences are not applicable if the candidate is personally using the time).

Date: 7/10/84 Susan Miller
 (Candidate, Supporter or Agent)

Accepted)
 Refected) by _____ Title _____
Jefferson Marketing, Inc.

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).



AGREEMENT FORM FOR POLITICAL BROADCASTS

STATION and LOCATION WFMY - TV Greensboro, N.C. 19 84

WE Jefferson Marketing, Inc. (being) U.S. Senator Jesse Helms
X ion behalf of

a legally qualified candidate of the Republican political party for the office of United States Senate

in the November, 1984 election to be held on November, 1984 do hereby request station time as follows:

LENGTH OF BROADCAST HOUR DAYS TIMES PER WEEK TOTAL NO WEEKS RATE

8
6
0
3
0
5
0
4
6
2
4

DATE OF FIRST BROADCAST	DATE OF LAST BROADCAST
July 20, 1984	July 22, 1984

Total Charges: \$ 518.50 net

The broadcast time will be used by Helms for Senate Committee / National Congressional Club
I represent that the advance payment for the above-described broadcast time has been furnished by

Mark Stephens, Treasurer and you are authorized to so describe that sponsor in your log and to announce the program as paid for by such person or entity. The entity furnishing the payment, if other than an individual person, is: () a corporation; () a committee; () an association; or () other unincorporated group. The names and offices of the chief executive officers of the entity are: Carter Wrenn, Treasurer

It is my understanding that if the time is to be used by the candidate himself within 45 days of a primary or primary runoff election, or within 60 days of a general or special election, the above charges represent the lowest unit charge of the station for the same class and amount of time for the same period; where the use is by a person or entity other than the candidate or is by the candidate but outside the aforementioned 45 or 60 day periods, the above charges do not exceed the charges made for comparable use of such station by other users.

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Date: 7/19/84 Susan Miller
(Candidate, Supporter or Agent)

Accepted) by _____ Title _____
Rejected)

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).



AGREEMENT FORM FOR POLITICAL BROADCASTS

27

STATION and LOCATION WFMY - TV Greensboro, NC 19 84
WE Jefferson Marketing, Inc. (being) U.S. Senator Jesse Helms
(on behalf of)

a legally qualified candidate of the Republican political party for the office of United States Senate

in the _____ election to be held on November, 1984 do hereby request station time as follows:

LENGTH OF BROADCAST HOUR DAYS TIMES PER WEEK TOTAL NO WEEKS RATE

86030504625

DATE OF FIRST BROADCAST <u>July 16, 1984</u>	DATE OF LAST BROADCAST <u>July 19, 1984</u>
---	--

Total Charges: \$1406.75 net

The broadcast time will be used by _____
I represent that the advance payment for the above-described broadcast time has been furnished by Helms for Senate Committee

_____ and you are authorized to so describe that sponsor in your log and to announce the program as paid for by such person or entity. The entity furnishing the payment, if other than an individual person, is: () a corporation; () a committee; () an association; or () other unincorporated group. The names and offices of the chief executive officers of the entity are: _____

Mark Stephens, Treasurer

It is my understanding that: If the time is to be used by the candidate himself within 45 days of a primary or primary runoff election, or within 60 days of a general or special election, the above charges represent the lowest unit charge of the station for the same class and amount of time for the same period; where the use is by a person or entity other than the candidate or is by the candidate but outside the aforementioned 45 or 60 day periods, the above charges do not exceed the charges made for comparable use of such station by other users.

It is agreed that use of the station for the above-stated purposes will be governed by the Communications Act of 1934, as amended, and the FCC's rules and regulations, particularly those provisions reprinted on the back hereof, which I have read and understand. I further agree to indemnify and hold harmless the station for any damages or liability that may ensue from the performance of the above-stated broadcasts. For the above-stated broadcasts I also agree to prepare a script or transcription, which will be delivered to the station at least _____ before the time of the scheduled broadcasts; (note: the two preceding sentences are not applicable if the candidate is personally using the time).

Date: 9/19/84 Susan B. Miller
(Candidate, Supporter or Agent)

Jefferson Marketing, Inc.

Accepted }
Rejected } by _____ Title _____

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 1907 • RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER

NO. 11058

290

VENDOR

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

SHIP TO:

Attention: Jeff Sales

28

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 TRIPPLICATE TO JEFFERSON MARKETING FOR FORWARDING TO CLIENT

CHASE ORDER DATE	DATE REQUIRED	JOB NUMBER	FOR	PERIOD REQUIRED	NO OF SAMPLES REQUIRED	ACCOUNT																																									
7-11-84	7-11-84					HPS																																									
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL																																								
85030504620		<p>To purchase :30 television time for Helms for Senate Committee.</p> <p>Ads to be announced</p> <p>Ads to run Mon. July 16 - Sun. Aug. 5, 1984</p> <table border="0"> <tr> <td>M-F</td> <td>6-8a</td> <td>Good Morning Show</td> <td>5 @ 90.</td> <td>450.00</td> </tr> <tr> <td>M-F</td> <td>8-9a</td> <td>Morning Rotation</td> <td>5 @ 45.</td> <td>225.00</td> </tr> <tr> <td>M-F</td> <td>3:58-4p</td> <td>Weatherbreak</td> <td>2 @ 125.</td> <td>250.00</td> </tr> <tr> <td>M-Th</td> <td>9-12n</td> <td>Morning Rotation</td> <td>4 @ 85.</td> <td>340.00</td> </tr> <tr> <td>(2)M,T,</td> <td>12-4p</td> <td>PM Rotation</td> <td>7 @ 130.</td> <td>910.00</td> </tr> <tr> <td>W,TH,(2)F</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Sun.</td> <td>7-9a</td> <td>Religion</td> <td>2 @ 40.</td> <td>80.00</td> </tr> <tr> <td>Fri.</td> <td>2-6a</td> <td>Movies</td> <td></td> <td>10.00</td> </tr> </table> <p style="text-align: right;">Gross 222</p> <p style="text-align: right;">less 15% 2265.00</p> <p style="text-align: right;">net 339.75</p> <p style="text-align: right;">\$1925.25</p>				M-F	6-8a	Good Morning Show	5 @ 90.	450.00	M-F	8-9a	Morning Rotation	5 @ 45.	225.00	M-F	3:58-4p	Weatherbreak	2 @ 125.	250.00	M-Th	9-12n	Morning Rotation	4 @ 85.	340.00	(2)M,T,	12-4p	PM Rotation	7 @ 130.	910.00	W,TH,(2)F					Sun.	7-9a	Religion	2 @ 40.	80.00	Fri.	2-6a	Movies		10.00		
M-F	6-8a	Good Morning Show	5 @ 90.	450.00																																											
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W,TH,(2)F																																															
Sun.	7-9a	Religion	2 @ 40.	80.00																																											
Fri.	2-6a	Movies		10.00																																											
<p>This is a weekly schedule to be repeated July 23-29 July 30-Aug. 5</p> <p>Weekly payment of \$ 1,925.25 Advertising/Seiber - HPS - TV Purchase</p> <p><u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u></p>																																															

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

TAS RPH

PURCHASING AGENT



AGREEMENT FORM FOR POLITICAL BROADCASTS

STATION and LOCATION WFMY-TV Greensboro, N.C. 19 84
 WE Jefferson Marketing, Inc. (being) U.S. Senator Jesse Helms
 (on behalf of)

a legally qualified candidate of the Republican political party for the office of United States Senate

in the _____ election to be held on November, 1984 do hereby request station time as follows:

LENGTH OF BROADCAST HOUR DAYS TIMES PER WEEK TOTAL NO. WEEKS RATE

7
6
5
4
3
2
1

DATE OF FIRST BROADCAST <u>July 20, 1984</u>	DATE OF LAST BROADCAST <u>July 27, 1984</u>	Total Charges: <u>\$4,454.00</u>
---	--	----------------------------------

The broadcast time will be used by _____
 I represent that the advance payment for the above-described broadcast time has been furnished by
Helms for Senate Committee / National Congressional Club

_____ and you are authorized to so describe that sponsor in your log and to announce the program as paid for by such person or entity. The entity furnishing the payment, if other than an individual person, is: () a corporation; () a committee; () an association; or () other unincorporated group. The names and offices of the chief executive officers of the entity are:
Mark Stephens, Treasurer / Carter Wrenn, Treasurer

It is my understanding that: If the time is to be used by the candidate himself within 45 days of a primary or primary runoff election, or within 60 days of a general or special election, the above charges represent the lowest unit charge of the station for the same class and amount of time for the same period; where the use is by a person or entity other than the candidate or is by the candidate but outside the aforementioned 45 or 60 day periods, the above charges do not exceed the charges made for comparable use of such station by other users.

It is agreed that use of the station for the above-stated purposes will be governed by the Communications Act of 1934, as amended, and the FCC's rules and regulations, particularly those provisions reprinted on the back hereof, which I have read and understand. I further agree to indemnify and hold harmless the station for any damages or liability that may ensue from the performance of the above-stated broadcasts. For the above-stated broadcasts I also agree to prepare a script or transcription, which will be delivered to the station at least _____ before the time of the scheduled broadcasts; (note: the two preceding sentences are not applicable if the candidate is personally using the time).

Date: 7/15/84 Susan Miller
 (Candidate, Supporter or Agent)

Accepted) by _____ Title _____
 Rejected)

Jefferson Marketing, Inc.

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, DC WTTN:

July 23-July 27

July 20-July 22

Greenville, SC, WNS:

Thursday: 8am, 6pm, 11:30 pm

Winston Salem, WJII:

scheduled twice last weekend, but not ordered since

Wilmington, WICT:

July 23-July 29

Mon-Fri, 7-9am

Thu-Fri, 6pm

Mon-Sun, 11:30 pm

Wilmington, WXPY:

July 23-July 27

Mon-Fri, 7-9am

Mon-Fri, 11:30-12am

Thu, Fri, 6-7pm

Thu, Fri, 11-11:30

Asheville, WLOS

Scheduled to run July 20-July 22, but did not appear

Charlotte, WSOC:

July 26-July 27, 5:55-5:57

July 23-July 27, 11:59pm-12:01 am

July 21, British Open

July 23-July 27, Good Morning America

July 21, Star Search

July 22, Star Search

8
2
6
4
0
5
0
3
0
6
2
8

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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 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 Jesse 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 30-second 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. ¶¶ 4, 6.

NCC 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 informed 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. ¶ 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-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 \$61,005 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

1/ 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. In 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

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'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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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. Claggett
Brice M. Claggett

John R. Bolton
John R. Bolton

Daniel A. Rowley
Daniel A. Rowley

Covington & Burling
1201 Pennsylvania Ave., N.W.
P.O. Box 7566
Washington, DC 20044
(202) 662-6000

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GCC# 4645

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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 710 822-0005 (CS WSH)
TELEX 88 883 (COVING WSH)
TELECOPIER (202) 662-6200
CABLE: COVING

September 11, 1984

BY HAND

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
7th Floor
1325 K Street, N.W.
Washington, DC 20463

84 SEP 11 AM 11:20

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

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. Enclosed is an executed copy of the affidavit, which is identical to the affidavit filed yesterday.

Sincerely,

Daniel A. Rowley
Daniel A. Rowley

Enclosure

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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.

4. 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. The 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.

6. 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 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.

7. After we decided to run the 30-second advertisement as part of our independent-expenditure project, we realized that Senator 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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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.

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.

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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.

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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14. Exhibit C to the complaint bears this out. It is 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.

15. The complaint intimates that somehow the times at 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; Anaheim, 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
R.E. Carter Wrenn

Subscribed and sworn to before me this 10 day of September, 1984.

Uigie L Anderson
Notary Public

My Commission expires: 4-27-86

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ATTACHMENT 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

86030504647

Question to National 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

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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 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 the National Congressional Club and Helms for Senate.

86030504649

GCC# 4645

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

TWIX 710 822-0008 (CB WSH)
TELEX 88 583 (COVLING WSH)
TELECOPIER: (202) 662-6290
CABLE: COVLING

September 11, 1984

BY HAND

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
7th Floor
1325 K Street, N.W.
Washington, DC 20463

Re: MUR 1748

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
84 SEP 11
All: 20

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. Enclosed is an executed copy of the affidavit, which is identical to the affidavit filed yesterday.

Sincerely,
Daniel A. Rowley
Daniel A. Rowley

Enclosure

86030504650

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.

4. 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. The 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.

6. 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 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.

7. After we decided to run the 30-second advertisement as part of our independent-expenditure project, we realized that Senator 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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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.

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.

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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.

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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14. Exhibit C to the complaint bears this out. It is 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.

15. The complaint intimates that somehow the times at 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.

* * *

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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
R.E. Carter Wrenn

Subscribed and sworn to before me this 10 day of September, 1984.

Virgie L. Anderson
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)
TELE: 89 593 (COVING 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

1748
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
Daniel A. Rowley

Enclosure

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SEP 10 1984
GENERAL COUNSEL

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 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 Jesse 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 30-second commercial is inaccurate. The Democratic Party states

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Charles N. Steele, Esq.
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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 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. ¶¶ 4, 6.

NCC 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 informed 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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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-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 \$61,005 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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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

1/ 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. In 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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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 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

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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. Claggett
Brice M. Claggett

John R. Bolton
John R. Bolton

Daniel A. Rowley
Daniel A. Rowley

Covington & Burling
1201 Pennsylvania Ave., N.W.
P.O. Box 7566
Washington, DC 20044
(202) 662-6000

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
)
 HELMS FOR SENATE COMMITTEE and) MUR 1748
 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 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.

4. 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. The 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.

6. 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 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.

7. After we decided to run the 30-second advertisement as part of our independent-expenditure project, we realized that Senator 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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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.

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.

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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.

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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14. Exhibit C to the complaint bears this out. It is 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.

15. The complaint intimates that somehow the times at 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.

* * *

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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

My Commission expires: _____

86030604675



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

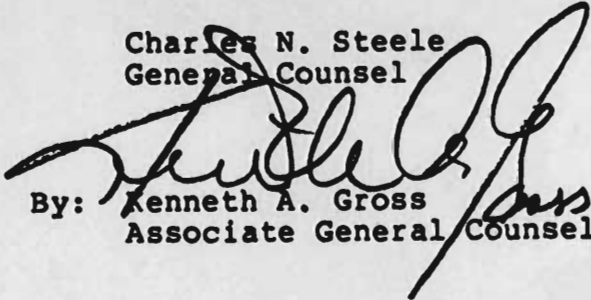
Dear Mr. Rowley:

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
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

86030604676

GCC# 4329

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: 710 662-0005 (CS WSH)
TELE: 66-663 (COVLING WSH)
TELECOPIER INFORMATION
(202) 662-6280
CABLE: COVLING

(202) 662-5344

August 15, 1984

BY HAND

• 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
Daniel A. Rowley

AUG 15 AM 11:06

GENERAL INVESTIGATIVE DIVISION

86030504677

GCC# 4572

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1748

NAME OF COUNSEL: Daniel A. Rowley **

ADDRESS: Covington & Burling
1201 Pennsylvania Ave., N.W.
Washington, DC 20044

TELEPHONE: (202) 662-5344

34 SEP 5 3:08

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

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

Cathy Urban
Signature

RESPONDENT'S NAME: National Congressional Club

ADDRESS: 3825 Barrett Drive
Raleigh, NC 17609

HOME 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.

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CCC 4319
RECEIVED AT THE FEC

STATEMENT OF DESIGNATION OF COUNSEL

84 AUG 12 11:38

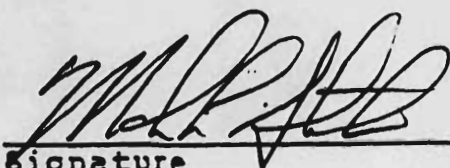
MUR 1748

NAME OF COUNSEL: Tom Farr, Attorney & John Bolton
Covington & Burling
 ADDRESS: Maupin, Taylor & Ellis 1201 Pennsylvania Ave, NW
Suite 200 Washington, D.C. 20044
Merrill Lunch Bldg. (202) 662-6000.
3201 Glenwood Ave.
Raleigh, NC 27612

TELEPHONE: (919) 781-6800

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


Signature

RESPONDENT'S NAME: Mark L. Stephens
3325 Executive Dr, Suite 1113
 ADDRESS: Raleigh, NC 27609

HOME PHONE: (919) 469-3585

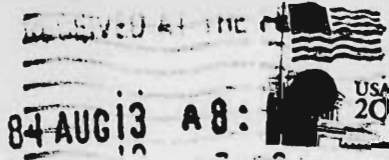
BUSINESS PHONE: (919) 876-8522

86030504679



HELMS for Senate

P. O. BOX 177000, RALEIGH, NORTH CAROLINA 27619



6030504680

Federal Elections Commission
1325 K St., N.W.
Washington, D.C. 20463



GCC#4329

COVINGTON & BURLING
1201 PENNSYLVANIA AVENUE, N.W.
P. O. BOX 7566
WASHINGTON, D. C. 20044

TELEPHONE
(202) 662-6000

TWX: 710 822-0008 (CB WSH)
TELEX: 88-823 (COVING WSH)
TELECOMER INFORMATION:
(202) 662-6260
CABLE: COVING

WRITER'S DIRECT DIAL NUMBER

(202) 662-5344

August 15, 1984

BY HAND

Gary Johansen, Esq.
Federal Election Commission
7th Floor
1325 K Street, N.W.
Washington, DC 20463

1984 AUG 15 AM 11:06

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
Daniel A. Rowley

85030504681



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

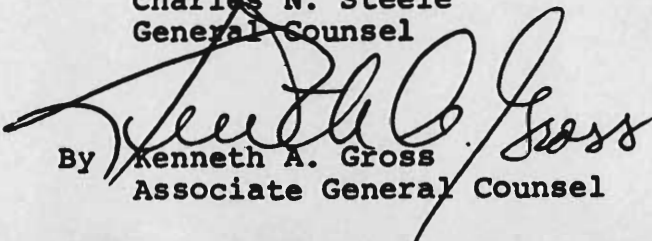
Dear Mr. Price:

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 Counsel


By Kenneth A. Gross
Associate General Counsel

Enclosure

85030504682



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 6, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Carter Wrenn, Treasurer
National Congressional Club
P. O. Box 18848
Raleigh, North Carolina 27619

Re: MUR 1748

Dear Mr. Wrenn:

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.

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.

86030604683

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

Kenneth A. Gross
By: Kenneth A. Gross
Associate General Counsel

Enclosures

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

86030504684

PS Form 3811, Oct. 1980

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).

- Show to whom and date delivered
- Show to whom, date, and address of delivery..
- RESTRICTED DELIVERY (The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$

3. ARTICLE ADDRESSED TO:
Carter Wrenn, Presr.
Natl. Cong. Club
PO Box 18848
Raleigh, NC 27619

4. TYPE OF SERVICE: ARTICLE NUMBER

- REGISTERED INSURED
- CERTIFIED COD
- EXPRESS MAIL

943322

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

Iris Cleaver

5. DATE OF DELIVERY

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

APR 22 1984

MUR 1748 Johansen 8684



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:

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.

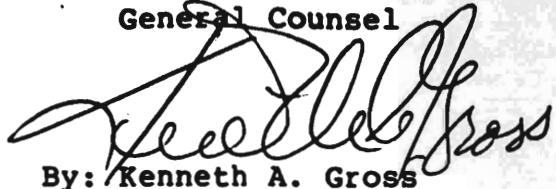
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

86030604695

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

statement

lms

FS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
 Show to whom and date delivered
 Show to whom, date, and address of delivery..
 RESTRICTED DELIVERY
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$

2. ARTICLE ADDRESSED TO:
 Mark L. Stephens, Presr.
 Helms for Senate
 1233 Pond Street
 Cary, NC 27511

4. TYPE OF SERVICE: ARTICLE NUMBER
 REGISTERED INSURED
 CERTIFIED COD
 EXPRESS MAIL
 943323

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent
 X *Mark L. Stephens*

5. DATE OF DELIVERY POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE: 7a. EMPLOYEE'S INITIALS

mark 1748 Johansen 8-6-84

FS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
 Show to whom and date delivered
 Show to whom, date, and address of delivery..
 RESTRICTED DELIVERY
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$

2. ARTICLE ADDRESSED TO:
 Sen. Helms
 402 Dirksen Senate Ofc. Bldg.
 Wash DC 20510

4. TYPE OF SERVICE: ARTICLE NUMBER
 REGISTERED INSURED
 CERTIFIED COD
 EXPRESS MAIL
 943324

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent
Mark L. Stephens

5. DATE OF DELIVERY POSTMARK
 7 6 84

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE: 7a. EMPLOYEE'S INITIALS

mark 1748 Johansen 8-6-84

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



RECEIVED AT THE FEC
HAND DELIVERED
The Goodwin House
220 Hillsborough Street

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
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

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

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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 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 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

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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. 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).

Allocation 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

86030504690

Mr. Charles N. Steele
July 26, 1984
Page Five

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. 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.

85030504691

Mr. Charles N. 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 26th day
of July, 1984.


Notary Public

My Commission Expires: Feb 25, 1985

86030604692

HELMS 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]

HELMS 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

ABZUG: THERE'S ONLY ONE WAY FOR YOU
TO MOVE, MR. REAGAN, AND THAT
IS TO MOVE OUT.

JACKSON: TO THE WHITE HOUSE, WE WILL
MARCH ON, MARCH ON

HELMS: YOU KNOW, NIGHT AFTER NIGHT THE
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.

ALL AMERICANS SHOULD SUPPORT
OUR PRESIDENT.

ANNCR: AMERICANS FOR REAGAN. A CAMPAIGN
OF THE NATIONAL CONGRESSIONAL CLUB.

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Under the dome



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.

In the commercial, Helms tells

See BOME, page 6A

Under the dome



Continued from page 1A

viewers that the liberal news 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 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.

86030504695

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER

NO. 11166

2623

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

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.

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

PURCHASE ORDER DATE		DATE REQUIRED	JOB NUMBER	F.O.B.	PROOF REQUIRED		NO OF SAMPLES REQUIRED	ACCOUNT
7-18-84		7-18-84			YES	NO		HFS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW					UNIT PRICE	TOTAL
86030604690		To purchase :30 television time for Helms for Senate Committee. Ads to be announced Ads to run Fri. July 20 - Thur. July 27, 1984 * M-F 7-9a Good Morning AMerica Mon. 9-cc Baseball Tue. 8-10p Movie "Nadia" gross 3950.00 less 15% 592.50 net \$3357.50 Advertising/Hawley - HFS - TV Purchase <u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQEUSTED</u> * TWO SPOTS TO RUN 7/20/84 IN 7-9A MOVED TO PURCHASE ORDER # 11110 TO RUN IN AFR-1						

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

L. Hawley
PURCHASING AGENT



AGREEMENT FORM FOR POLITICAL BROADCASTS

STATION and LOCATION WRAL-TV, Raleigh, N.C. 7/18 19 84
 WE Jefferson Marketing, Inc. (being) U.S. Senator Jesse Helms
 X (on behalf of)

a legally qualified candidate of the Republican political party for the office of _____
United States Senate

in the _____ election to be held on November, 1984 do hereby request station time as follows:

LENGTH OF BROADCAST _____ HOUR _____ DAYS _____ TIMES PER WEEK _____ TOTAL NO. WEEKS _____ RATE _____

DATE OF FIRST BROADCAST <u>July 20, 1984</u>	DATE OF LAST BROADCAST <u>July 27, 1984</u>	Total Charges: <u>\$3,357.50</u>
---	--	----------------------------------

The broadcast time will be used by _____
 I represent that the advance payment for the above-described broadcast time has been furnished by _____
Helms for Senate Committee / National Congressional Club

_____ and you are authorized to so describe that sponsor in your log and to announce the program as paid for by such person or entity. The entity furnishing the payment, if other than an individual person, is: () a corporation; () a committee; () an association; or () other unincorporated group. The names and offices of the chief executive officers of the entity are: _____
Mark Stephens, Treasurer / Carter Wrenn - Treasurer

It is my understanding that: If the time is to be used by the candidate himself within 45 days of a primary or primary runoff election, or within 60 days of a general or special election, the above charges represent the lowest unit charge of the station for the same class and amount of time for the same period; where the use is by a person or entity other than the candidate or is by the candidate but outside the aforementioned 45 or 60 day periods, the above charges do not exceed the charges made for comparable use of such station by other users.

It is agreed that use of the station for the above-stated purposes will be governed by the Communications Act of 1934, as amended, and the FCC's rules and regulations, particularly those provisions reprinted on the back hereof, which I have read and understand. I further agree to indemnify and hold harmless the station for any damages or liability that may ensue from the performance of the above-stated broadcasts. For the above-stated broadcasts I also agree to prepare a script or transcription, which will be delivered to the station at least _____ before the time of the scheduled broadcasts; (note: the two preceding sentences are not applicable if the candidate is personally using the time).

Date: 7/15/84 Susan Miller
 (Candidate, Supporter or Agent)

Accepted) by _____ Title _____
 Rejected) Jefferson Marketing, Inc.

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 18807
RALEIGH, N. C. 27618

No 6214

06-30
831

July 18, 1984

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 P. Holding

⑈00006214⑈ ⑆05310030010861143935⑈

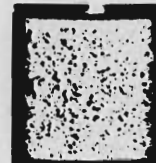
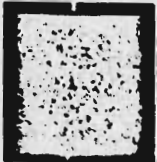
DETACH AND RETAIN THIS STATEMENT

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW IF NOT CORRECT PLEASE NOTIFY US PROMPTLY NO RECEIPT DESIRED

JEFFERSON MARKETING INC.

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

360305



JEFFERSON MARKETING, INC.

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

PURCHASE ORDER

NO.

11110

3045

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

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 DATE	DATE REQUIRED	JOB NUMBER	F.O.B.	PROOF REQUIRED		NO. OF SAMPLES REQUIRED	ACCOUNT
7-16-84	7-16-84			BY	NO		HFS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL
35030604699		To purchase television time for Helms for Senate Committee. AFR-1 "Defending Reagan" :30 Ads to run Mon. July 23 - Fri. July 27, 1984 M-F 7-9a Good Morning America				5 @ 225.	1125.00
						less 15%	168,75
						net	\$ 956.25
Advertising/Hawley - HFS/AFR - TV Purchase <u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>							

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

L. Hawley *RPH* *P. Jones*
PURCHASING AGENT

G
ORIGINAL



AGREEMENT FORM FOR POLITICAL BROADCASTS

STATION and LOCATION WRAL-TV Raleigh, N.C. 1984
 WE Jefferson Marketing, Inc. (being) U.S. Senator Jesse Helms
 X (on behalf of)

a legally qualified candidate of the Republican political party for the office of United States Senate

in the _____ election to be held on November, 1984 do hereby request station time as follows:

LENGTH OF BROADCAST HOUR DAYS TIMES PER WEEK TOTAL NO. WEEKS RATE

0
0
7
0
0

DATE OF FIRST BROADCAST <u>July 23</u>	DATE OF LAST BROADCAST <u>July 27</u>
---	--

Total Charges: \$956.25

The broadcast time will be used by _____
 I represent that the advance payment for the above-described broadcast time has been furnished by Helms for Senate Committee / National Congressional Club

and you are authorized to so describe that sponsor in your log and to announce the program as paid for by such person or entity. The entity furnishing the payment, if other than an individual person, is: () a corporation; () a committee; () an association; or () other unincorporated group.
 The names and offices of the chief executive officers of the entity are: _____

X Mark Stephens, Treasurer / Carter Wrenn, Treasurer

It is my understanding that: If the time is to be used by the candidate himself within 45 days of a primary or primary runoff election, or within 60 days of a general or special election, the above charges represent the lowest unit charge of the station for the same class and amount of time for the same period; where the use is by a person or entity other than the candidate or is by the candidate but outside the aforementioned 45 or 60 day periods, the above charges do not exceed the charges made for comparable use of such station by other users.

It is agreed that use of the station for the above-stated purposes will be governed by the Communications Act of 1934, as amended, and the FCC's rules and regulations, particularly those provisions reprinted on the back hereof, which I have read and understand. I further agree to indemnify and hold harmless the station for any damages or liability that may ensue from the performance of the above-stated broadcasts. For the above-stated broadcasts I also agree to prepare a script or transcription, which will be delivered to the station at least _____ before the time of the scheduled broadcasts; (note: the two preceding sentences are not applicable if the candidate is personally using the time).

Date: 7/18/84 Jesse Helms
 (Candidate, Supporter or Agent)
Jefferson Marketing, Inc.

Accepted }
 Rejected } by _____ Title _____

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 18807
RALEIGH, N. C. 27618

No 6160

66-30
531

July 18, 19 84

PAY TO THE
ORDER OF

WRAL - TV

\$ 956.25

THE SUM 956 DOLS 25 CTS

DOLLARS

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

Robert P. Holding III

⑈00006160⑈ ⑆053100300⑆0861143935⑈

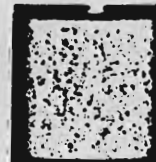
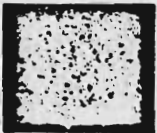
701

DETACH AND RETAIN THIS STATEMENT

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW. IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

JEFFERSON MARKETING INC.

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





AGREEMENT FORM FOR POLITICAL BROADCASTS

STATION and LOCATION WXII-TV Winston Salem, N.C. 10 84
 WE Jefferson Marketing, Inc. (being) U.S. Senator Jesse Helms
 X (on behalf of)

a legally qualified candidate of the Republican political party for the office of United States Senate

in the _____ election to be held on November, 1984 do hereby request station time as follows:

LENGTH OF BROADCAST HOUR DAYS TIMES PER WEEK TOTAL NO. WEEKS RATE

DATE OF FIRST BROADCAST July 20, 1984	DATE OF LAST BROADCAST July 27, 1984	Total Charges: <u>\$2,465.00</u>
--	---	----------------------------------

The broadcast time will be used by _____
 I represent that the advance payment for the above-described broadcast time has been furnished by Helms for Senate Committee / National Congressional Club

_____ and you are authorized to so describe that sponsor in your log and to announce the program as paid for by such person or entity. The entity furnishing the payment, if other than an individual person, is: () a corporation; () a committee; () an association; or () other unincorporated group. The names and offices of the chief executive officers of the entity are: Mark Stephens, Treasurer / Carter Wrenn, Treasurer

It is my understanding that: If the time is to be used by the candidate himself within 45 days of a primary or primary runoff election, or within 60 days of a general or special election, the above charges represent the lowest unit charge of the station for the same class and amount of time for the same period; where the use is by a person or entity other than the candidate or is by the candidate but outside the aforementioned 45 or 60 day periods, the above charges do not exceed the charges made for comparable use of such station by other users.

It is agreed that use of the station for the above-stated purposes will be governed by the Communications Act of 1934, as amended, and the FCC's rules and regulations, particularly those provisions reprinted on the back hereof, which I have read and understand. I further agree to indemnify and hold harmless the station for any damages or liability that may ensue from the performance of the above-stated broadcasts. For the above-stated broadcasts I also agree to prepare a script or transcription, which will be delivered to the station at least _____ before the time of the scheduled broadcasts; (note: the two preceding sentences are not applicable if the candidate is personally using the time).

Date: 7/18/84 Susan Miller
 (Candidate, Supporter or Agent)

Accepted) by Raymond H. Colby Title V.P., C.M.
 Rejected) Jefferson Marketing, Inc.

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).

85030604702

PERSON MARKETING, INC.

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

NO. 11160
<small>THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.</small>

VENDOR WXII - TV
700 Coliseum Dr.
Winston Salem, N.C. 27101

SHIP TO

Attention: Zack 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.

PURCHASE ORDER DATE	DATE REQUIRED	JOB NUMBER	FOB	PROOF REQUIRED	ACCOUNT	
7-18-84	7-18-84			NO	HFS	
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW			UNIT PRICE	TOTAL
		To purchase :30 television time for Helms for Senate Committee/Americans for Reagan AFR-1 "Defending Reagan" Ads to run Fri. July 20 - Sun. July 22, 1984 Sat. 1-6p Major League Baseball Sat. 11-11:30p Late News Sun. 12:30-1p Meet the Press Sun. 2-6p Michigan Sun. 6-6:30 Early News Sun. 11-11:30p Late News <i>Baseball</i>				
					150 300	300.00 225.00 100.00 200.00 350.00 225.00 <hr/> 1500.00 less 15% 225.00 <hr/> net \$1275.00
		Advertising/Dawson - HFS/AFR - Television Purchase <u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>				

860305 79

P.O. Incorrect Should be as follows

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

R.H.E. Miller *D. Jones*
PURCHASING AGENT

ORIGINAL

JEFFERSON MARKETING, INC.
 P.O. BOX 19807 • RALEIGH, NORTH CAROLINA 27619

NO. **11108**
 THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE

VENDOR

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

SHIP TO

Attention: Zack 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.

86030504704

PURCHASE ORDER DATE		DATE REQUIRED		JOB NUMBER	F.O.B.	PROOF REQUIRED		NO OF SAMPLES REQUIRED	ACCOUNT
7-16-84		7-16-84				Y	N		HFS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW						UNIT PRICE	TOTAL
		To purchase television time for Helms for Senate Committee. AFR-1 "Defending Reagan" :30 Ads to run Mon. July 23 - Fri. July 27, 1984 M-F 7-9a Today Show Th, F 6p News Tg, F 11p News						5 @ .50 2 @ 350 2 @ 225	250.00 700.00 450.00
		gross							1400.00
		less 15 %							210.00
		net							\$1190.00
Advertising/Dawson - HFS/AFR - TV Purchase <u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>									

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

S. Miller RPH
 PURCHASING AGENT

ORIGINAL
 J

JEFFERSON MARKETING INC.
P. O. BOX 1887
RALEIGH, N. C. 27610

No 6152

06-30
83T

July 18, 1984

PAY TO THE ORDER OF WXII - TV \$ 1190.00

THE SUM T 9 0 D O L S 0 0 C T S

DOLLARS

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

Robert P. Holding

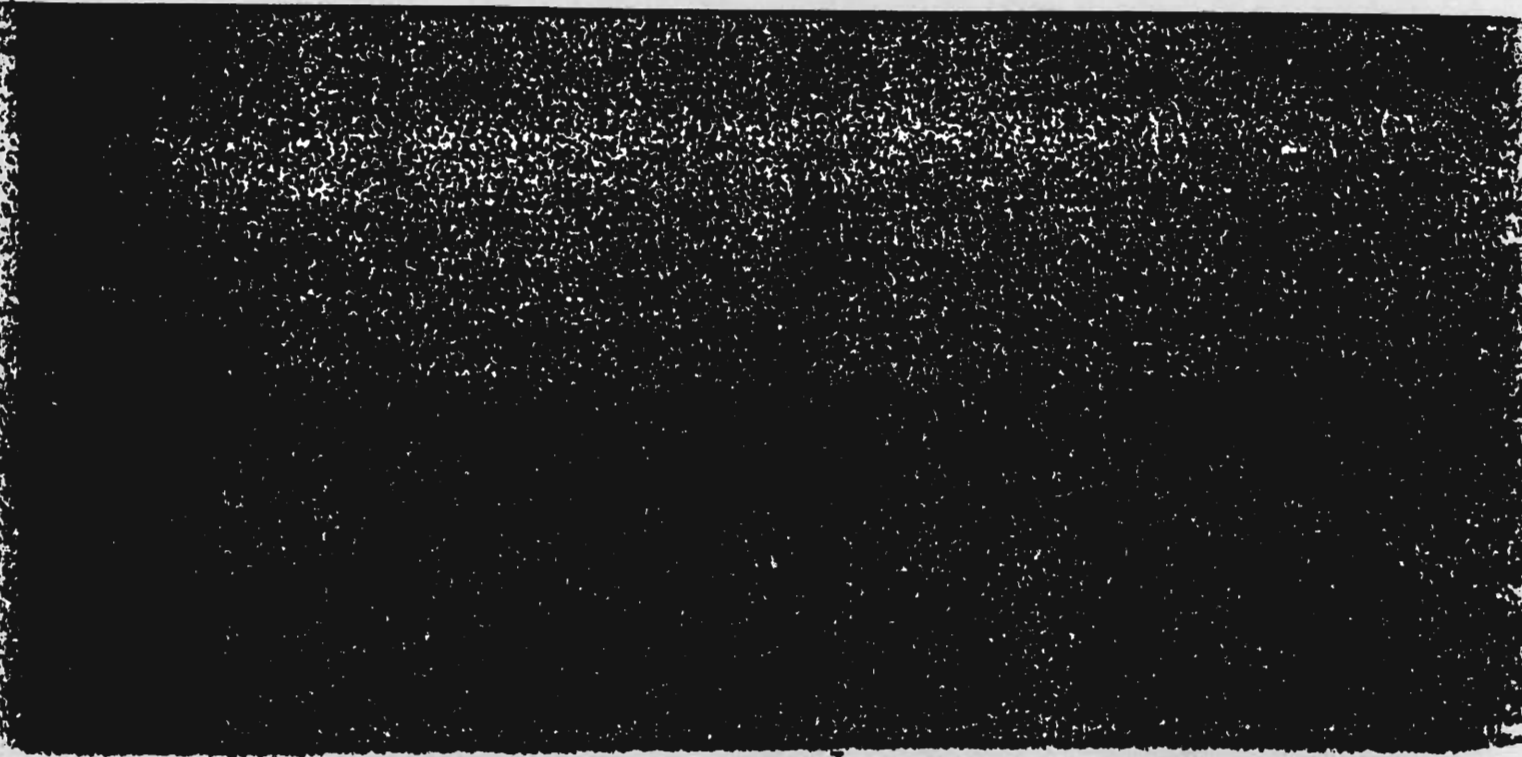
⑈00006152⑈ ⑆053100300⑆0861143935⑈

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF FEES DESCRIBED BELOW. IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

JEFFERSON MARKETING INC.

DATE	DESCRIPTION	AMOUNT
7/18/84	PO #11108 - To purchase TV time for Helms for Senate. RECEIPT & AFFIDAVIT REQUESTED	\$1190.00

30504705



JEFFERSON MARKETING INC.

P. O. BOX 1997
RALEIGH, N. C. 27618

No 6208

08-30
EST

July 18, 19 84

PAY TO THE ORDER OF WXII - TV

\$ 1275.00

THE SUM I 275 DOLS 00 CTS

DOLLARS

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

Robert P. Holding

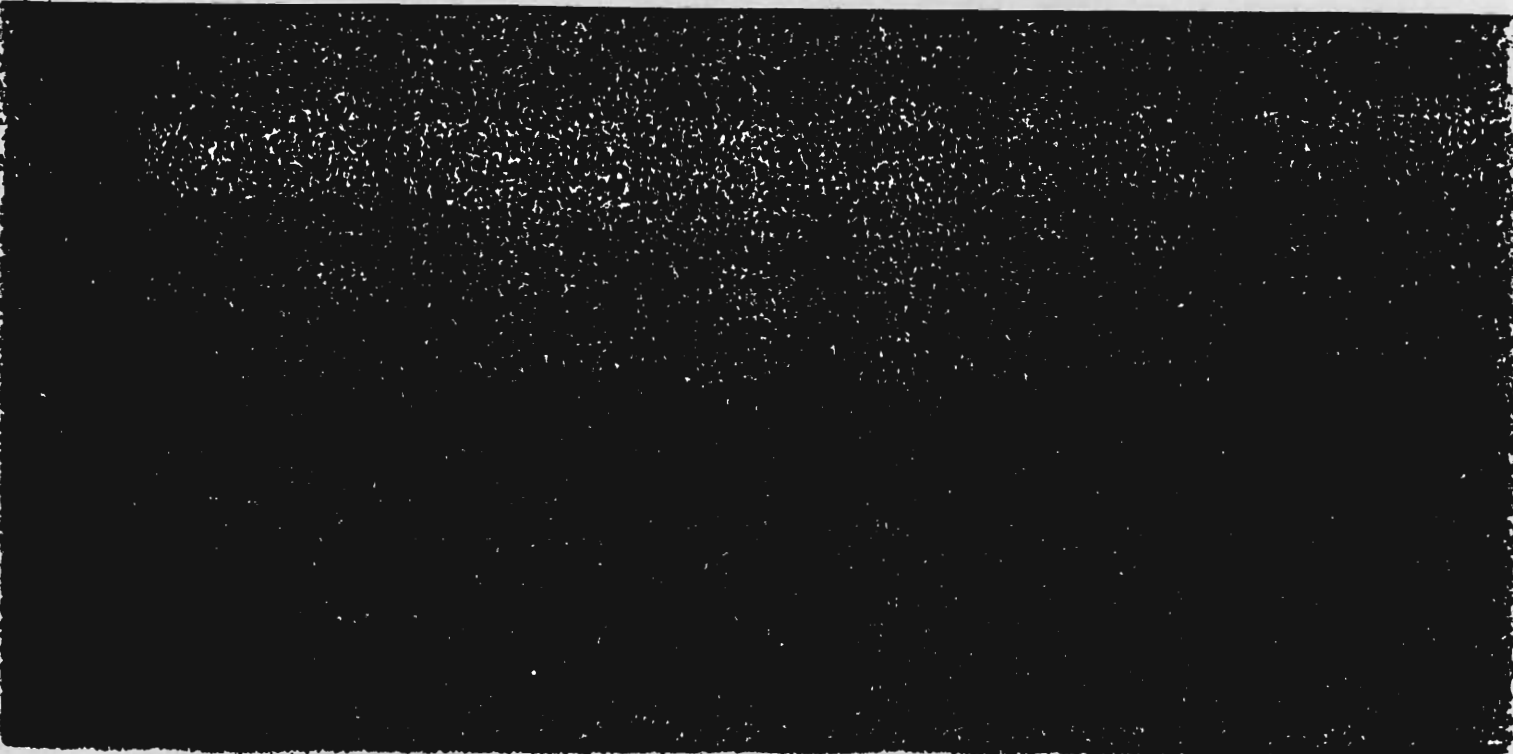
⑈00006208⑈ ⑆05310030010861143935⑈

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW. IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

JEFFERSON MARKETING INC.

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

030507-00





AGREEMENT FORM FOR POLITICAL BROADCASTS

STATION and LOCATION WGHP-TV High Point, N.C. 1084
 WE Jefferson Marketing, Inc. (being) U.S. Senator Jesse Helms
 X (on behalf of)

a legally qualified candidate of the Republican political party for the office of _____
United States Senate

in the _____ election to be held on November, 1984 do hereby request station time as follows:

LENGTH OF BROADCAST HOUR DAYS TIMES PER WEEK TOTAL NO. WEEKS RATE

DATE OF FIRST BROADCAST <u>July 20, 1984</u>	DATE OF LAST BROADCAST <u>July 27, 1984</u>	Total Charges: <u>\$3,230.00</u>
---	--	----------------------------------

The broadcast time will be used by _____
 I represent that the advance payment for the above-described broadcast time has been furnished by
Helms for Senate Committee / National Congressional Club

_____ and you are authorized to so describe that sponsor in your log and to announce the program as paid for by such person or entity. The entity furnishing the payment, if other than an individual person, is: () a corporation; () a committee; () an association; or () other unincorporated group. The names and offices of the chief executive officers of the entity are:
Mark Stephens, Treasurer / Carter Wrenn, Treasurer

It is my understanding that: If the time is to be used by the candidate himself within 45 days of a primary or primary runoff election, or within 60 days of a general or special election, the above charges represent the lowest unit charge of the station for the same class and amount of time for the same period; where the use is by a person or entity other than the candidate or is by the candidate but outside the aforementioned 45 or 60 day periods, the above charges do not exceed the charges made for comparable use of such station by other users.

It is agreed that use of the station for the above-stated purposes will be governed by the Communications Act of 1934, as amended, and the FCC's rules and regulations, particularly those provisions reprinted on the back hereof, which I have read and understand. I further agree to indemnify and hold harmless the station for any damages or liability that may ensue from the performance of the above-stated broadcasts. For the above-stated broadcasts I also agree to prepare a script or transcription, which will be delivered to the station at least _____ before the time of the scheduled broadcasts; (note: the two preceding sentences are not applicable if the candidate is personally using the time).

Date: 7/18/84 Susan Miller
 (Candidate, Supporter or Agent)
Jefferson Marketing, Inc.

Accepted)
 Rejected) by _____ Title _____

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).

86030604707

JEFFERSON MARKETING, INC.

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

PURCHASE ORDER	
NO.	11165
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES AND CORRESPONDENCE.	

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 PURCHASE ORDER.

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

PURCHASE ORDER DATE	DATE REQUIRED	JOB NUMBER	F.O.B.	PAID	REQUARED	NO OF SAMPLES REQUIRED	ACCOUNT
7-18-84	7-18-84			YES	NO		HFS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW				UNIT PRICE	TOTAL
		<p>TO purchase :30 television time for Helms for Senate Committee/Americans for Reagan</p> <p>AFR-1 "Defending Reagan"</p> <p>Ads to run Fri. July 20 - Sun. July 22, 1984</p> <p>Sun. 6-6:30p TV Eyewitness News 200.00 Fri. 6-6:30p TV Eyewitness News 425.00 Sat/Sun 12-2p Birtish Open 650.00 Sun. 4-6p Aspen Tennis 350.00</p> <p>gross 1625.00 less 15% 243.75 net \$1381.25</p>				2 @ 325	
		Advertising/Miller - HFS/AFR - TV Purchase					
		<u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>					

86030104703

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

[Signature]
S. Miller
PURCHASING AGENT

Acknowledgment of Agreement Between Television Station WGHP-TV and



JEFFERSON MARKETING
P. O. BOX 19807
RALEIGH
S. MILLER

NC 27619

(herein referred to as "station")

Contract No. 386902 Agency YES Client No. 831799 Date Entered 07-20-84 Amendment Date Amount \$ LOCAL REG LUC STD Billing VOL 7002 Station
System WGHP-TV Advertiser AMER. FOR REG/HELMS 3 Ad. No. Product K-CAND/P & S Prod. C. PO Card 10 End Date 07-22-84

Line No.	Start Date	End Date	Length	Description	Calendar							No. Spots	Pym/Class	Spots/Plan	Rate	Makegood For
					M	T	W	T	F	S	S					
01	07-20-84	07-20-84	30	M-F** 600-7 AM					1				JL		20	
02	07-20-84	07-20-84	30	M-F 12N-1230P					1				A4		75	
03	07-21-84	07-21-84	30	SAT 12M-1AM						1			ZK		30	
04	07-22-84	07-22-84	30	SUN 7A-1030A							2		S1		30	

86030604709

January February March April May June July August September October November December Contract Total 185.00

Agency JEFFERSON MARKETING Representative As Agent for AMER. FOR REG/HELMS 3 by _____ As Agent for Television Station WGHP-TV by _____

Agreement Between
 Television Station WGHP-TV
 and



1000 POINT
 GREENSBORO
 WISCONSIN SALON
 400 N. MAIN ST.
 10000 POINT, N.C.
 27300

JEFFERSON MARKETING
 P. O. BOX 19807
 RALEIGH
 SUSAN MILLER

(herein referred to as "station")

NC 27619

Order No.	Agency	Client No.	Date Entered	Amendment Date	Amend No.	Representative	Billing	Salesman	Start Date
6901	YES	831799	07-19-84	07-24-84	2	LOCAL REG	LOC STD	POL 7002	07-20-84
on		Advertiser	Adv. No.		Product		Prod. C.	Card	End Date
HP-TV		AMER. FOR REG/HELMS S			F-CAND/U.S.SENATE/A		FD	1C	07-22-84

Order	Start Date	End Date	Length	Description	Calendar							Pgm/Class	Sec/Plan	Rate	Makegood For	Line
					M	T	W	T	F	S	S					
15	07-20-84	07-20-84	30	M-F 6-7PM									EN		425	
	07-22-84	07-22-84	30	SUN 5-530PM								1	XP		200	
	07-21-84	07-21-84	30	SA/SU 1200N0200P							1		GF		325	
	07-22-84	07-22-84	30	SA/SU 1000A0130P							1		GF		325	
	07-22-84	07-22-84	30	SUN 4-6PM/1								1	5A		350	

85030304710

January	February	March	April	May	June
July	August	September	October	November	December

Contract Total
 1,625.00

Agency
 JEFFERSON MARKETING
 representative

As Agent for
 AMER. FOR REG/HFLMS S

As Agent for
 Television Station WGHP-TV

by _____
 by _____

The terms and conditions on the reverse side of this page and any attachments hereto are an integral part of this agreement. The station shall not be bound by any terms or conditions not contained herein.



AGREEMENT FORM FOR POLITICAL BROADCASTS

STATION and LOCATION WFMY-TV Greensboro, N.C. 10 84
 WE Jefferson Marketing, Inc. (being) U.S. Senator Jesse Helms
 X (on behalf of)

a legally qualified candidate of the Republican political party for the office of United States Senate

in the _____ election to be held on November, 1984 do hereby request station time as follows:

LENGTH OF BROADCAST HOUR DAYS TIMES PER WEEK TOTAL NO. WEEKS RATE

8
6
0
3
0
5
0
4
7
1
1

DATE OF FIRST BROADCAST <u>July 20</u>	DATE OF LAST BROADCAST <u>JULY 22</u>
---	--

Total Charges: \$459.00 net

The broadcast time will be used by _____
 I represent that the advance payment for the above-described broadcast time has been furnished by Helms for Senate Committee / National Congressional Club

_____ and you are authorized to so describe that sponsor in your log and to announce the program as paid for by such person or entity. The entity furnishing the payment, if other than an individual person, is: () a corporation; () a committee; () an association; or () other unincorporated group. The names and offices of the chief executive officers of the entity are: Mark Stephens, Treasurer / Carter Wrenn, Treasurer

It is my understanding that: If the time is to be used by the candidate himself within 45 days of a primary or primary runoff election, or within 60 days of a general or special election, the above charges represent the lowest unit charge of the station for the same class and amount of time for the same period; where the use is by a person or entity other than the candidate or is by the candidate but outside the aforementioned 45 or 60 day periods, the above charges do not exceed the charges made for comparable use of such station by other users.

It is agreed that use of the station for the above-stated purposes will be governed by the Communications Act of 1934, as amended, and the FCC's rules and regulations, particularly those provisions reprinted on the back hereof, which I have read and understand. I further agree to indemnify and hold harmless the station for any damages or liability that may ensue from the performance of the above-stated broadcasts. For the above-stated broadcasts I also agree to prepare a script or transcription, which will be delivered to the station at least _____ before the time of the scheduled broadcasts; (note: the two preceding sentences are not applicable if the candidate is personally using the time).

Date: 7/19/84 Susan Miller
 (Candidate, Supporter or Agent)
Jefferson Marketing, Inc.

Accepted }
 Rejected } by _____ Title _____

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).



AGREEMENT FORM FOR POLITICAL BROADCASTS

STATION and LOCATION WFMY - TV Greensboro, N.C. 10 84
 WE Jefferson Marketing, Inc. (being) U.S. Senator Jesse Helms
 X (on behalf of)

a legally qualified candidate of the Republican political party for the office of United States Senate

in the _____ election to be held on November, 1984 do hereby request station time as follows:

(LENGTH OF BROADCAST) (HOUR) (DAYS) (TIMES PER WEEK) (TOTAL NO WEEKS) (RATE)

36030504712

DATE OF FIRST BROADCAST	DATE OF LAST BROADCAST	Total Charges: \$ 518.50 net
July 20, 1984	July 22, 1984	

The broadcast time will be used by _____
 I represent that the advance payment for the above-described broadcast time has been furnished by Helms for Senate Committee / National Congressional Club

_____ and you are authorized to so describe that sponsor in your log and to announce the program as paid for by such person or entity. The entity furnishing the payment, if other than an individual person, is: () a corporation; () a committee; () an association; or () other unincorporated group. The names and offices of the chief executive officers of the entity are: Mark Stephens, Treasurer Carter Wrenn, Treasurer

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Date: 7/19/84 Susan Miller
 (Candidate, Supporter or Agent)

Accepted)
 Rejected) by _____ Title _____
 Jefferson Marketing, Inc.

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).



AGREEMENT FORM FOR POLITICAL BROADCASTS

STATION and LOCATION WFMY - TV Greensboro, NC 19 84
WE Jefferson Marketing, Inc. (being) U.S. Senator Jesse Helms
X (on behalf of)

a legally qualified candidate of the Republican political party for the office of United States Senate

in the _____ election to be held on November, 1984 do hereby request station time as follows:

(LENGTH OF BROADCAST) (HOUR) (DAYS) (TIMES PER WEEK) (TOTAL NO WEEKS) (RATE)

DATE OF FIRST BROADCAST	DATE OF LAST BROADCAST	Total Charges: <u>\$1406.75 net</u>
July 16, 1984	July 19, 1984	

The broadcast time will be used by _____
I represent that the advance payment for the above-described broadcast time has been furnished by Helms for Senate Committee

_____ and you are authorized to so describe that sponsor in your log and to announce the program as paid for by such person or entity. The entity furnishing the payment, if other than an individual person, is: () a corporation; () a committee; () an association; or () other unincorporated group. The names and offices of the chief executive officers of the entity are: Mark Stephens, Treasurer

It is my understanding that: If the time is to be used by the candidate himself within 45 days of a primary or primary runoff election, or within 60 days of a general or special election, the above charges represent the lowest unit charge of the station for the same class and amount of time for the same period; where the use is by a person or entity other than the candidate or is by the candidate but outside the aforementioned 45 or 60 day periods, the above charges do not exceed the charges made for comparable use of such station by other users.

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Date: 9/19/84 Susan B. Miller
(Candidate, Supporter or Agent)
Jefferson Marketing, Inc.

Accepted)
Rejected) by _____ Title _____

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).

86030604713

JEFFERSON MARKETING, INC.

P.O. BOX 19107 • RALEIGH, NORTH CAROLINA 27619

PURCHASE ORDER	
NO.	11058

2905

VENDOR

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

SHIP TO

Attention: Jeff Sales

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 DATE	DATE REQUIRED	JOB NUMBER	JOB	PRICE REQUIRED	NO OF SAMPLES REQUIRED	ACCOUNT
7-11-84	7-11-84					NPS
QUANTITY ORDERED	QUANTITY SHIPPED	PLEASE SUPPLY ITEMS LISTED BELOW			UNIT PRICE	TOTAL
4		To purchase :30 television time for Helms for Senate Committee.				
		Ads to be announced				
		Ads to run Mon. July 16 - Sun. Aug. 5, 1984				
		M-F	6-8a	Good Morning Show	5 @ 90.	450.00
		M-F	8-9a	Morning Rotation	5 @ 45.	225.00
		M-F	3:58-4p	Weatherbreak	2 @ 125.	250.00
		M-Th	9-12n	Morning Rotation	4 @ 85.	340.00
		(2)M,T,	12-4p	PM Rotation	7 @ 130.	910.00
		W,TH,(2)F				
		Sun.	7-9a	Religion	2 @ 40.	80.00
		Fri.	2-6a	Movies		10.00
				Gross		222
				less 15%		2265.00
				net		339.75
						\$1925.25
		This is a weekly schedule to be repeated				
				July 23-29		
				July 30-Aug. 5		
		Weekly payment of \$ 1,925.25				
		Advertising/Saiber - NPS - TV Purchase				
		<u>CHECK ATTACHED: RECEIPT & AFFIDAVIT REQUESTED</u>				

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

JAS RPH
 PURCHASING AGENT



AGREEMENT FORM FOR POLITICAL BROADCASTS

STATION and LOCATION WFMY-TV Greensboro, N.C. 1984
 WE Jefferson Marketing, Inc. (being) U.S. Senator Jesse Helms
 X (on behalf of)

a legally qualified candidate of the Republican political party for the office of United States Senate

in the _____ election to be held on November, 1984 do hereby request station time as follows:

LENGTH OF BROADCAST HOUR DAYS TIMES PER WEEK TOTAL NO. WEEKS RATE

DATE OF FIRST BROADCAST	DATE OF LAST BROADCAST	Total Charges: <u>\$4,454.00</u>
July 20, 1984	July 27, 1984	

The broadcast time will be used by _____
 I represent that the advance payment for the above-described broadcast time has been furnished by Helms for Senate Committee / National Congressional Club

_____ and you are authorized to so describe that sponsor in your log and to announce the program as paid for by such person or entity. The entity furnishing the payment, if other than an individual person, is: () a corporation; () a committee; () an association; or () other unincorporated group. The names and offices of the chief executive officers of the entity are: Mark Stephens, Treasurer / Carter Wrenn, Treasurer

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Date: 7/15/84 Susan Miller
 (Candidate, Supporter or Agent)

Accepted)
 Rejected) by _____ Title _____
Jefferson Marketing, Inc.

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 WTTN:

July 23-July 27

July 20-July 22

Greenville, ^{SC} WNS:

Thursday: 8am, 6pm, 11:30 pm

Winston Salem, WXTI:

scheduled twice last weekend, but not ordered since

Wilmington, WECT:

July 23-July 29

Mon-Fri, 7-9am

Thu-Fri, 6pm

Mon-Sun, 11:30 pm

Wilmington, WWPY:

July 23-July 27

Mon-Fri, 7-9am

Mon-Fri, 11:30-12am

Thu, Fri, 6-7pm

Thu, Fri, 11-11:30

Asheville, WLOS

Scheduled to run July 20-July 22, but did not appear

Charlotte, WSOC:

July 26-July 27, 5:55-5:57

July 23-July 27, 11:59pm-12:01 am

July 21, British Open

July 23-July 27, Good Morning America

July 21, Star Search

July 22, Star Search

3 5 0 3 0 0 4 7 1 5



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20543

THIS IS THE BEGINNING OF MUR # 1748

Date Filmed 7/31/86 Camera No. --- 3

Cameraman AS

86030504717