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1 resolve this without having to get into a lot of statutory
2 analysis. The fact is there was no request for any of the
3 information that is the subject matter of the lawsuit unless you
4 take the view that the, the general statement in the regulations
5 that the Committee will have an opportunity to issue a response
6 is turned into a request for everything that the Committee
7 provides.

8 THE COURT: All right. Thank you, sir. Let me hear
9 again just from the defendant for a minute, and then I'm going to
10 wrap this up.

11 Mr. Keeney, as to these requests and their nongermane
12 responses defaming the plaintiffs' business when it was an
13 opportunity and not a demand, how does this fall under this
14 immunity provision again?

15 MR. KEENEY: It falls into the immunity provision by
16 starting with the statutory audit, which is the broadest circle
17 of the three arguments that I presented. It was part of the
18 statutory audit. Then we get into the fact this is part of the
19 audit response which is provided for an opportunity. I agree
20 with them that the regulation doesn't say we had to file the
21 interim audit response.

22 But then we reach the third level. We have a cover
23 letter from the FEC saying, "We request you to comply with these
24 recommendations in full," and I believe the date was by May 4.

25 Now we look at the recommendations. Recommendation

(14)

1 No. 8, which was summarized with a couple ellipses in by counsel
2 for the other side, is a little bit broader than counsel
3 summarized it for.

4 With the Court's permission, from page 30, I would like
5 to just read three sentences so the Court gets it in its
6 entirety. The three sentences are: "Provide the following
7 information regarding equipment and facilities: Explain and
8 document the functions of Public Office Corporation "(POC)" with
9 respect to services provided to the Committee. Explain and
10 document whether the functions performed by POC were performed on
11 any computer system owned or leased by the committee. Explain
12 and document whether any POC files were moved to any computer
13 system owned or leased by the Committee, and provide the date(s)
14 the transfer occurred." It was a little broader.

15 With respect to Recommendation 10, we were told we
16 could either comply with the FEC's request to submit an
17 explanation by May 4 or they were going to rule against the
18 Committee. We think that's a broad question. That's a broad
19 request.

20 We think the response submitted by the Committee was
21 not only 100 percent right legally; we also believe it was 100
22 percent correct factually, but Your Honor doesn't have to reach
23 those points, because the only issue before this Court is was
24 that response called for by the FEC's request, and we think it
25 clearly was. It was a broad request. They got a very broad

(15)

1 answer covering many different points, of which only one is
2 complained about today.

3 THE COURT: Is there any cutoff to this immunity
4 provision of very low-level employee rights to some election
5 committee, a letter requesting some innocuous information,
6 receives back an outrageous response accusing some other
7 individual of wrongdoing? Is there any cutoff, or is everybody
8 that writes to the Commission for any reason protected if the
9 Commission has called them and said, "We'd like to talk to you,"
10 or whatever? I mean, is there any cutoff?

11 MR. KEENEY: We start with the statute, Your Honor,
12 which provides the response. The statute defines the
13 Commission. It does not limit the Commission to the
14 commissioners. Therefore, under the statute, this is a broad,
15 broad immunity.

16 If during the course of an audit in particular any FEC
17 employee on FEC stationery writes to a political committee
18 demanding information, that's going to fall within the statute,
19 Your Honor. If Congress wanted to limit the immunity, as was
20 suggested by counsel for the other side, to a specific request
21 issued by the commissioners of the Commission, Congress certainly
22 knew how to do that. It does it in other provisions of the
23 Federal Election Code.

24 That's not how this one reads, and "Commission" is
25 specifically defined, and it's not defined to mean commissioners.

16

1 THE COURT: Is there anything under the same statutory
2 language that you found in the Consumer Protection Act as to how
3 that's been used in their Commission at all?

4 MR. KRENEY: No, Your Honor. We really looked. We
5 were really hoping to find a case construing it. We were hoping
6 to find an administrative practice, but unfortunately, I think
7 you're just going to have the statutes.

8 THE COURT: All right. Thank you, counsel. I'm not
9 going to take up the other issues at this time. I have other
10 matters pending to hear today.

11 I'm going to take this under advisement. I want to say
12 for the benefit of the parties that are here that this is a very
13 broad immunity statute, and I will take a look at it, because it
14 concerns me as to the scope of this immunity provision that's
15 provided that seems to have no end as long as it has something to
16 do with the Commission, but since it is a matter of first
17 impression, as far as I can tell, in this circuit or in any
18 circuit, I'm going to take a look at it and put out a written
19 opinion in the not-too-distant future for you all.

20 MR. GELTNER: Could I just add one thing?

21 THE COURT: Yes, sir, Mr. Geltner.

22 MR. GELTNER: Since you've got work to do to understand
23 the statute, let me just cite one case relating to the Consumer
24 Product Safety Commission statute. I don't think it helps much
25 one way or another, but it does discuss some of these issues

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(17)

1 under that statute. It's Relco v. Consumer Product Safety
2 Commission. It's 391 F.Supp. 841, a district court decision.
3 1975.

4 THE COURT: Is that out of--

5 MR. GELTNER: It's not from this district.

6 THE COURT: Not from this district?

7 MR. GELTNER: And I don't think it's particularly
8 helpful, but you may disagree.

9 THE COURT: I appreciate it. Thank you, sir.

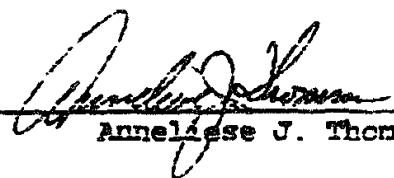
10 Thank you, counsel, for coming in.

11 (Which were all the proceedings had at
12 this time.)

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CERTIFICATE OF THE REPORTER

I certify that the foregoing is a correct transcript of the
record of proceedings in the above-entitled matter.


Anneliese J. Thomson

requiring that any notification or investigation made shall not be made public without written consent of parties, applied only to enforcement proceedings under Act, and not to audit and repayment determination process under Presidential Election Campaign Fund Act. Federal Election Campaign Act of 1971, §§ 313(a)(12), (a)(4)(B)(i), 2 U.S.C.A. §§ 437g(a)(12), (a)(4)(B)(i); 26 U.S.C.A. § 9001 et seq.

9. Records ⇐ 30

Section of Presidential Election Campaign Fund Act, requiring Federal Election Commission to submit reports to Congress after each election as to financial data of campaign committees receiving funds under Act, did not mandate confidentiality of Commission's audit process where statute did not suggest that Congress was to keep such reports confidential, and, since information that was subject of such reports to Congress did not involve conciliation efforts or notifications or investigations under Federal Election Campaign Act, neither did its provisions compel Congress to guard confidentiality of reports. Federal Election Campaign Act of 1971, § 313, 2 U.S.C.A. § 437g; 26 U.S.C.A. § 9009(a).

10. United States ⇐ 82(6.5)

Section of Presidential Election Campaign Fund Act, requiring Federal Election Commission to submit reports to Congress after each election as to financial data of campaign committees receiving funds under Act, evinces a purpose on part of Congress to allow taxpayers who choose to direct a portion of their taxes to Presidential Election Campaign Fund to know exactly how those tax monies are being spent. Federal Election Campaign Act of 1971, § 313, 2 U.S.C.A. § 437g; 26 U.S.C.A. § 9009(a).

11. Records ⇐ 54

Federal Election Commission audit report, as document created by agency, is subject to mandatory disclosure under Freedom of Information Act. 5 U.S.C.A. § 552.

12. Records ⇐ 31

Proviso "except as may be required by law" in section of Presidential Election Campaign Fund Act proscribing any indi-

vidual's disclosure of information obtained under provisions of Act "except as may be required by law," must be read to incorporate Freedom of Information Act's disclosure requirements. 5 U.S.C.A. § 552; 26 U.S.C.A. § 9012(g)(1).

13. Records ⇐ 30

Campaign committees' concern about their reputation was not sufficient to warrant keeping Federal Election Commission audit report secret, especially when report would not contain information implicating campaign committees in violations of law. Federal Election Campaign Act of 1971, § 301 et seq., 2 U.S.C.A. § 431 et seq.; 26 U.S.C.A. §§ 9001 et seq., 9007.

14. Records ⇐ 30

Prompt disclosure of audit reports to electorate is essential to meeting purposes of Presidential Election Campaign Fund Act and Federal Election Campaign Act. 5 U.S.C.A. § 552; Federal Election Campaign Act of 1971, § 301 et seq., 2 U.S.C.A. § 431 et seq.; 26 U.S.C.A. §§ 9001 et seq., 9007.

15. Records ⇐ 30

Public has right to know, and promptly, how its monies are spent by Presidential campaign committees. 5 U.S.C.A. § 552; Federal Election Campaign Act of 1971, § 301 et seq., 2 U.S.C.A. § 431 et seq.; 26 U.S.C.A. §§ 9001 et seq., 9007.

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Charles N. Steele, Gen. Counsel, Lawrence M. Noble, Asst. Gen. Counsel (argued), Sondra L. Mills, Daniel J. Blessington, Attys., Federal Election Commission, Washington, D. C., for defendant.

MEMORANDUM OPINION

JOYCE HENS GREEN, District Judge.

This is an action by the Reagan Bush Committee and the Reagan Bush Compliance Fund (collectively, RBC), two cam-

paigned committees of the Republican Presidential and Vice-Presidential candidates in the 1980 election to enjoin defendant, the Federal Election Commission (FEC), from withholding certain documents assertedly required to be disclosed under the Freedom of Information Act, 5 U.S.C. § 552 (FOIA), and from making any public disclosure of certain reports relating to audits of RBC conducted by the FEC before RBC is afforded an adequate hearing with respect to the subject of the audit and related matters pending before the FEC.

A hearing on the preliminary injunction sought by RBC was consolidated with the trial on the merits and held on October 21, 1981. The FEC has moved to dismiss the cause for lack of subject matter jurisdiction and failure to state a claim upon which relief can be granted, or, in the alternative, for summary judgment. RBC has moved for partial summary judgment, asking that the Court enter an order precluding the FEC from rendering and publishing an interim determination on allegations and recommendations pending before the Commission with respect to any violations of federal election laws RBC may be charged with having committed, or any repayments of campaign funds that the FEC may order RBC to make, without first providing RBC the hearing it seeks. Because it is clear that the FEC has not withheld any documents from RBC improperly and that the report the FEC plans to disclose cannot by law contain information concerning violations of election laws and, in any event, is not a final determination of liability (continued input into the process and judicial review still to be available to RBC at subsequent stages of the administrative procedure), dismissal without prejudice as to the FOIA request and summary judgment as to the application for injunctive relief against

public disclosure of the audit report will be granted to the FEC and RBC's motion for partial summary judgment will be denied.

Some discussion of the background of this case is necessary to comprehend what precisely is at stake here. Indeed, defendant suggests that the dispute may in part be attributable to a misunderstanding on the part of RBC as to the relevant audit process and the nature of the report the FEC plans to make public. The two RBC committees are organizations authorized to receive campaign contributions and payments and to make campaign expenditures under the Federal Election Campaign Act (FECA), 2 U.S.C. §§ 431 *et seq.*, and the Presidential Election Campaign Fund Act (PECFA), 26 U.S.C. §§ 9001 *et seq.* Complaint, ¶¶ 2, 3. RBC received \$29,440,000 from the United States Treasury through the Presidential Election Campaign Fund. Defendant's Statement of Facts Not in Dispute, ¶ 5. RBC was paid this amount upon the conditions that it comply with certain provisions of PECFA and, *inter alia*, agree "to obtain and furnish to the Commission such evidence as it may request of the qualified campaign expenses of [its] campaign," "to keep and furnish to the Commission such records, books, and other information as it may request," and "to [submit to] an audit and examination by the Commission under Section 9007 and to pay any amounts required to be paid under such section." Letter from the Honorable Ronald Reagan and the Honorable George Bush to the Commission, July 18, 1980 (Exhibit 1 to Defendant's Opposition to Plaintiffs' Motion for a Preliminary Injunction). These conditions are prerequisites to eligibility to receive funds under PECFA. 26 U.S.C. § 9003(a).¹

The FEC is the agency responsible for administering the provisions of the two

1. 26 U.S.C. § 9003(a) provides:

(a) In general. In order to be eligible to receive any payments under section 9006, the candidates of a political party in a presidential election shall, in writing—

(1) agree to obtain and furnish to the Commission such evidence as it may request of the qualified campaign expenses of such candidates.

(2) agree to keep and furnish to the Commission such records, books, and other information as it may request, and

(3) agree to an audit and examination by the Commission under section 9007 and to pay any amounts required to be paid under such section.

acts. The two acts have different, but related purposes. PECFA establishes a fund for Presidential candidates' campaigns from tax monies. The act provides a scheme by which candidates are determined to be eligible for payments from the fund and sets forth standards to determine when candidates have received more than their fair share of monies from the fund and must make repayments. 26 U.S.C. §§ 9001 et seq. FECA, on the other hand, does not concern the disbursement of campaign funds to candidates, but regulates the organization and operation of campaigns, by, *inter alia*, requiring certain organizational and financial reports, and prohibiting or limiting certain campaign contributions. 2 U.S.C. §§ 431 et seq. The FEC derives authority from PECFA to conduct audits and examinations to determine whether repayments are due under that act. 26 U.S.C. § 9007.² Its authority to enforce violations

of PECFA (e. g., knowing and willful failures to comply with the payment conditions, see, 26 U.S.C. § 9012) and of FECA is found in FECA, at 2 U.S.C. § 437g.

The audit report in question is a product of the examining and auditing process under PECFA, rather than of the enforcement procedure under FECA. The audit process begins after each Presidential election, when the Commission is required to conduct an examination and audit of the qualified campaign expenses of the candidates of each political party for President and Vice President. 26 U.S.C. § 9007(a); 11 C.F.R. § 9007.1. The audit serves to determine whether the candidate has been paid from the Campaign Fund more than he was entitled to receive under section 9004 of the Act and should make repayments to the Fund. 26 U.S.C. 9007(b); 11 C.F.R. § 9007.2. An interim audit report, not required by statute or regulation, is presented to each can-

2. 26 U.S.C. § 9007 provides:

(a) Examinations and audits. After each presidential election, the Commission shall conduct a thorough examination and audit of the qualified campaign expenses of the candidates of each political party for President and Vice President.

(b) Repayments.

(1) If the Commission determines that any portion of the payments made to the eligible candidates of a political party under section 9006 was in excess of the aggregate payments to which candidates were entitled under section 9004, it shall so notify such candidates, and such candidates shall pay to the Secretary of the Treasury an amount equal to such portion.

(2) If the Commission determines that the eligible candidates of a political party and their authorized committees incurred qualified campaign expenses in excess of the aggregate payments to which the eligible candidates of a major party were entitled under section 9004, it shall notify such candidates of the amount of such excess and such candidates shall pay to the Secretary of the Treasury an amount equal to such amount.

(3) If the Commission determines that the eligible candidates of a major party or any authorized committee of such candidates accepted contributions (other than contributions to make up deficiencies in payments out of the fund on account of the application of section 9006(c)) to defray qualified campaign expenses (other than qualified campaign expenses with respect to which payment is required under paragraph (2)), it shall notify such candidates of the amount of

the contributions so accepted, and such candidates shall pay to the Secretary of the Treasury an amount equal to such amount.

(4) If the Commission determines that any amount of any payment made to the eligible candidates of a political party under section 9005 was used for any purpose other than—

(A) to defray the qualified campaign expenses with respect to which such payment was made, or

(B) to repay loans the proceeds of which were used, or otherwise to restore funds (other than contributions to defray qualified campaign expenses which were received and expended) which were used, to defray such qualified campaign expenses.

it shall notify such candidates of the amount so used, and such candidates shall pay to the Secretary of the Treasury an amount equal to such amount.

(5) No payment shall be required from the eligible candidates of a political party under this subsection to the extent that such payment, when added to other payments required from such candidates under this subsection, exceeds the amount of payments received by such candidates under section 9006.

(c) Notification. No notification shall be made by the Commission under subsection (b) with respect to a presidential election more than 3 years after the day of such election.

(d) Deposit of repayments. All payments received by the Secretary of the Treasury under subsection (b) shall be deposited by him in the general fund of the Treasury.

candidate's campaign committee, with an opportunity to respond thereto, under an informal practice established by the FEC. Letter from FEC Chairman McGarry to Counsel for RBC, August 4, 1981 (Exhibit H to Complaint).

Upon completion of the final audit, which may or may not contain a determination that repayments are appropriate, the Commission is required to notify the candidates whether such repayments will be required. 26 U.S.C. § 9007(b)(2); 11 C.F.R. § 9007.2(a). A candidate found to be owing repayments must make such repayments within 30 days of receiving notice thereof from the Commission, but may request a 90 day extension of the repayment period. 11 C.F.R. § 9007.2(b). Moreover, if a candidate disputes the finding that repayments are due, he is afforded the opportunity to present to the Commission his arguments to the contrary, in writing, within 30 days of the issuance of the Commission's determination, a further 30 day extension of such time available upon request by the candidate and grant by the Commission. 11 C.F.R. § 9007.2(c). The Commission must consider any such submittals by a candidate in making its final determination on the repayment question, which determination must contain a written statement of reasons for the recommendation made. 11 C.F.R. § 9007.2(d), (e). Judicial review of a final determination on this issue is available by appeal to the United States Court of Appeals for the District of Columbia Circuit. 26 U.S.C. § 9011(a).

If the audit process should uncover information indicating a violation of PECFA (i.e., the knowing and willful incurring of excess expenditures, acceptance of certain contributions to defray expenses, making unauthorized expenditures and contributions, and the like as noted at 26 U.S.C. § 9012) or FECA, such information may be used in the enforcement process under FECA, at 2 U.S.C. § 437g. However, information relating to any notification or investigation under § 437g must remain confidential. 2 U.S.C. § 437g(a)(12)(A).

In the matter at hand, the FEC is not near its final determination on the question

of repayment. The FEC commenced its audit report of RBC pursuant to 26 U.S.C. § 9007 on January 28, 1981. Defendant's Statement of Facts Not in Dispute, ¶ 6. On March 27, 1981, the Audit Division of the FEC held an "exit conference" with officials and attorneys of RBC at which they discussed the Audit Division's preliminary findings. *Id.* The same findings were expressed in the Audit Division's "interim report," which was delivered to RBC on June 19, 1981. *Id.*; Complaint, ¶ 15. In the letter accompanying the report, the Assistant Staff Director for the Audit Division informed RBC that it would have 30 days to respond to the findings of the auditors, after which time the audit staff would present a "final audit report" to the Commission for its approval and for subsequent public release. Exhibit A to Complaint; Defendant's Statement of Facts Not in Dispute, ¶ 6. On July 6, 1981, RBC asked for a 30 day extension of its time to respond to the interim report, which was denied by the FEC on July 13, 1981. RBC submitted its response to the report on July 20, 1981, under protest, because it contended that it needed more time to make an adequate response and believed it was entitled to a stay of further Commission action and an administrative hearing on the issues considered in the report. Plaintiffs' Response to Defendant's Statement of Facts, ¶¶ 6, 7; Complaint, ¶ 39. On August 4, 1981, the FEC granted RBC an extension of time until August 11, 1981 to supplement its response in writing, but denied its request for a stay of further action and a hearing. Letter from FEC Chairman McGarry to Counsel for RBC (Exhibit H to Complaint). RBC filed its complaint with this Court on August 10, 1981, and shortly thereafter, submitted its supplemental response to the interim audit report.

With the facts of the events leading up to the instant matter established, an examination of RBC's claims is in order.

1. RBC's Request for Disclosure of Documents under the Freedom of Information Act

In the course of the auditing process discussed above, and by the date of its com-

plaint in this action, RBC had made three requests to the FEC for documents and records under the Freedom of Information Act (FOIA), 5 U.S.C. § 552. The first request, dated July 6, 1981, sought records in the FEC's control or possession which were generated or relied upon in the course of its examination and audit of RBC's receipts and expenditures. Complaint, ¶ 18. The second request, made July 17, 1981, sought information as to procedural standards and rules followed by the FEC in the audit process under PECFA. *Id.*, at ¶ 20. The third request, dated July 20, 1981, sought information as to substantive standards and rules followed by the FEC in the PECFA audit process and in enforcing the limitations on contributions and expenditures set forth in FECA at 2 U.S.C. § 441a. *Id.*, at ¶ 22. RBC, in its complaint, alleged that the FEC had not provided it with access to materials responsive to the second and third requests, nor a disclosure determination with respect to the requests, and that, although the FEC provided it with documents represented to be all those responsive to the first request, other responsive documents remained to be disclosed or identified to RBC. *Id.*, at ¶¶ 21, 23, 24. As a result, RBC argues, as to the second and third requests, the FEC failed to meet the requirement of timely response to information requests established in FOIA and FEC regulations at 5 U.S.C. § 552(a)(6) and 11 C.F.R. § 4.7.

The FEC avers that RBC made five requests in all to it under FOIA, including the requests of July 6, 17, and 20 noted above, and two additional ones, on July 29 and 30, 1981. Defendant's Memorandum of Points and Authorities in Opposition to Plaintiffs' Motion for Preliminary Injunction, at 10. The requests of July 29 and 30, according to the FEC, sought, respectively, records concerning the standards and rules followed by the FEC in enforcing the contribution limitations of FECA at 2 U.S.C. § 441a(a)(1)(A) and 11 C.F.R. § 110.1(a)(1), and a report on the FEC's policies and procedures prepared for it by Arthur Andersen & Co. *Id.*, at 11; Exhibits 5, 6 to Defendant's Opposition.

[1] It is clear that the FEC has made a good faith, diligent effort to comply with, and has substantially complied with, RBC's five FOIA requests. By letter to RBC of August 27, 1981 the FEC's Freedom of Information Act officer noted that the agency had, on July 30, acknowledged to RBC receipt of its second and third requests (the requests of July 17 and 20) and its July 29 request, advising RBC that the search for records would begin on August 3, 1981. Letter from FOIA Officer Fred Eiland to Counsel for RBC (Exhibit 7 to Defendant's Opposition). In the same letter, the FOIA Officer stated that RBC's requests were "quite broad," but that even despite RBC's refusal to narrow its requests, the FEC would "continue to make, every effort to identify those documents which respond, or potentially respond to those requests." *Id.* The FEC avers that the July 30 request was answered in full on August 12, 1981, and that RBC was provided with a box of documents sought under the July 17, 20, and 29 requests and indexes to other records potentially responsive to those requests. Defendant's Memorandum in Opposition to Plaintiff's Motion, at 11; Exhibits 8, 9 to Defendant's Opposition. Additional documents were disclosed and an index given to RBC of documents the FEC believed exempt from disclosure on September 17, 1981. Exhibit 1 to Defendant's Memorandum of Points and Authorities in Support of its Motion to Dismiss, Or, in the Alternative, for Summary Judgment.

[2] Inasmuch as the FEC has responded to RBC's five requests under FOIA with due diligence and that requested documents have been made and continue to be made available to RBC, judicial intervention as to the disclosure of the records in question is premature. At the hearing on the merits of this case on October 21, 1981, counsel for RBC did not press the issue of the documents' disclosure; moreover, RBC has not challenged the FEC's assertion that it has made substantial compliance with the requests for disclosure. RBC has never specified to this Court which documents it believes should be but have not been disclosed.

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The FEC has responded to each of the requests promptly; however, to the extent that it was not able to respond precisely within the period within which the statute requires disclosure, it is evident on the record that the wide scope of the requests and the consequent difficulty of their processing, created "exceptional circumstances" that could justify the delay. See, 5 U.S.C. § 552(a)(6)(B); *Open America v. Watergate Special Prosecution Force*, 547 F.2d 605 (D.C.Cir.1976). In any case, as disclosure of the records and documents is ongoing, and as RBC has not delineated which documents it claims must yet be disclosed, no action shall be taken by the Court as to such disclosure, and the prayer for an injunction against the FEC to enjoin it from denial of notice of and access to the requested documents, for orders to compel disclosure of the documents and to expedite proceedings, and for attorney's fees and costs, will be dismissed without prejudice.

2 RBC's Prayer for an Injunction Against Further FEC Action Regarding Repayment Determinations and Possible Statutory Violations and Against Disclosure of the Audit Report

The major issue in the matter at hand, and that which was the focus of the hearing on the merits of this action, is whether the FEC should be enjoined from rendering a final determination or making any public disclosure with respect to what RBC calls "alleged statutory violations and recommended repayment requirements," purportedly arising from the FEC's audit under PECFA, until RBC is given an opportunity to respond to the disputed allegations and recommendations, including a hearing, and presented with the documents it seeks under FOIA. *Complaint*, §§ 11-12. In support of its motion to dismiss, or alternatively, for summary judgment, the FEC's position essentially is that since the audit report to be disclosed will not contain any determinations by the FEC of violations of FECA or of PECFA, but by law may merely contain recommendations that repayments not relating to violations of law be made, due

process does not require any opportunity to be heard at this time. As such, the FEC argues, RBC has failed to present a justiciable case or controversy creating jurisdiction in this Court over the subject matter of this dispute. RBC, in opposition, and in support of its motion for partial summary judgment on the issue of the request to enjoin disclosure of the report, argues that this Court does have subject matter jurisdiction under the jurisdictional statute for federal questions, 28 U.S.C. § 1331, and under the provision of FOIA concerning failure to make timely disclosures of records, 5 U.S.C. 552(a)(4)(B), since, it argues, documents have not been released timely and the FEC's refusal to grant it an opportunity to be heard deprives it of procedural safeguards and confidentiality provisions of FECA and PECFA. RBC asserts that these protections are necessary because, it alleges, the FEC "unequivocally has represented that it will render and publish a 'final audit report' on the alleged statutory violations and repayment recommendations". Obviously, there is a misunderstanding as to the contents of the impending audit report.

[3] It is clear that repayment determinations under section 9007 of PECFA do not constitute findings or allegations of violations of the act under section 9012, RBC's interpretation to the contrary. The FEC has characterized repayment determinations as analogous to determinations that income tax is owed: unless it is not paid or there is a willful attempt to evade payment, there is no violation of law. The meager legislative history on this point bears this out. Repayment determinations are not considered to involve violations of law, but "Criminal penalties are provided for willful violations constituting prohibited transactions." H. Conf. Rept. No. 92-708, 92d Cong., 1st Sess, 117 Cong. Rec. 44783 (Dec. 4, 1971), reprinted in (1971) U.S.Code Cong. & Admin.News 2077. Appropriately, the procedure leading to repayment determinations which includes the audit process and the procedure for enforcing violations of PECFA and FECA are treated as two dif-

ferent functions under the statutory scheme and by the FEC in practice.

[4] FEC Chairman McGarry, in his August 4, 1981 letter to RBC counsel, Exhibit H to Complaint (McGarry Letter), explained to RBC the FEC's interpretation of the law relevant to the audit procedure. He correctly distinguished the FEC's enforcement function from its audit function by noting that findings concerning violations of federal election laws are governed by FECA, at 2 U.S.C. § 437g, while the FEC's authority to make repayment determinations is derived from PECFA, at 26 U.S.C. § 9007(b). As such, Chairman McGarry correctly noted, the instant audit process was governed by PECFA, specifically 26 U.S.C. § 9007 and regulations promulgated thereunder. McGarry Letter at 1-2. It was at this point that Chairman McGarry explained to RBC the significance of the interim audit report, stating that:

Although not required by statute or regulation, the issuance of an interim audit report and the opportunity to respond to such report are among several informal steps in the audit process.

It has been Commission practice to allow committees of publicly-financed candidates a period of 30-days from receipt of an interim report to submit responses to matters contained in the report. Such responses are reviewed by the Audit Division prior to making any recommendations to the Commission, and are considered by the Commission before voting on the contents of the final audit report.

Id.

As such, it is clear that the interim report made available to RBC in June, 1981 and the final audit report that the FEC seeks to disclose are two different documents that in all probability will contain different material, inasmuch as the final audit report which would be made public would follow further submissions by RBC. In addition, Chairman McGarry specifically noted that, at the time of his letter, the Audit Division "ha[d] yet to make a recommendation for repay-

ment" and that a certain dollar amount on the interim report represented a preliminary calculation which "should not be interpreted as a Commission determination." McGarry Letter, at 3.

[5] Moreover, by law the final audit report cannot contain assertions of violations of election laws. As noted above, violations of FECA and PECFA, as distinguished from repayment determinations, are enforced under FECA, at 2 U.S.C. § 437g. The relevant part of that section provides that "Any notification or investigation made under this section shall not be made public by the Commission or by any person without the written consent of the person receiving such notification or the person with respect to whom such investigation is made." 2 U.S.C. § 437g(a)(12)(A). Consequently, RBC's fears of disclosure of information relating to alleged violations are groundless, and therefore, with respect to disclosure of such information, there is nothing to require remedying.

[6] Inasmuch as the audit process is merely a preliminary procedure which may lead to initial determinations that repayments are due or cause the FEC to initiate proceedings as to statutory violations, the audit report does not constitute a final determination for which due process would require an opportunity to be heard. The audit report merely is part of a fact-finding investigation, and as such, to afford RBC the full panoply of judicial procedures now would be premature, serving only the pursuit of delay. See, e. g. *Hannah v. Larche*, 363 U.S. 420, 442, 80 S.Ct. 1502, 1514, 4 L.Ed.2d 1307 (1960).

Still, the audit process leading to repayment determinations is replete with procedural protections. As noted above, after a campaign committee is given its interim audit report, FEC practice is to allow a 30 day period for written responses thereto, even though regulations require neither the presentation of this interim audit report to the campaign committees nor the opportunity to respond to it. McGarry Letter (Exhibit H to Complaint), at 2. RBC was given not only the 30 day period to respond, but

an extension of time (to August 11). Moreover, the materials submitted by a committee to the FEC as a part of this informal procedure are considered by the Audit Division in making recommendations to the Commission, and by the Commission as well before making its final determination, even though, again, nothing in the regulations or statutes requires the FEC to allow such submittals. After an initial repayment determination is made, regulations provide for 30 days (and a possible 30 day extension) to make additional submittals in writing in the event that the campaign committee disputes the FEC's initial determination. 11 C.F.R. § 9007.2(c). Any materials submitted under 11 C.F.R. § 9007.2(c) must be considered by the FEC in making its final determination. 11 C.F.R. § 9007.2(d). That final determination must include a statement in writing for the FEC's action, 11 C.F.R. § 9007.2(e), and is, as noted above, reviewable in the Court of Appeals. 26 U.S.C. § 9011(a).

[7] Consequently, the statutory audit procedure furnishes RBC with sufficient input comporting with the requirements of due process. Moreover, should the information in the audit procedure lead toward enforcement of violations under FECA, the law provides for adequate notice of allegations of such violations, see, 2 U.S.C. § 437g(a)(2), and an opportunity to resolve the matter by informal methods of conference and conciliation, 2 U.S.C. § 437g(a)(4)(A)(i), with such conciliation efforts remaining confidential pursuant to 2 U.S.C. § 437g(a)(4)(B)(i). Should the matter not be resolved by informal means, the FEC has the authority to initiate a civil action for relief in an appropriate United States District Court, under 2 U.S.C. § 437g(a)(6), where the campaign committee charged with violations of law would have all the procedural protections normally afforded defendants in civil cases.

[8] RBC also argues that the terms of FECA and PECFA, aside from due process requirements, direct that the audit report in question remain confidential. RBC cites 2 U.S.C. § 437g(a)(4)(B)(i) and § 437(a)(12) for

the proposition that FECA prohibits disclosure of information concerning proceedings thereunder. However, these provisions apply only to enforcement proceedings under FECA, and not to the audit and repayment determination process set forth in PECFA. Subsection (a)(4)(B)(i) specifies that no information in connection with a "conciliation attempt" by the FEC under section 437g(a)(4)(A) may be made public without the parties' written consent. Yet the audit process is not a "conciliation attempt" under that statute, but a procedure under PECFA, and as such, the confidentiality provision of subsection (a)(4)(B)(i) does not apply. *Federal Election Commission v. Illinois Medical Political Action Committee*, 503 F.Supp. 45, 47 (N.D.Ill.1980). Subsection (a)(12), as noted above, requires that "[a]ny notification or investigation made under this section shall not be made public" without the written consent of the parties. Again, however, the audit process is not a "notification or investigation" under section 437g, but a procedure established by PECFA. Moreover, as another court noted, "The legislative history of the provision [section 437g(a)(12)(A)] clearly establishes that it was not meant to conceal the results or the contents of an investigation, but rather that it was meant to avoid adverse speculative publicity during the pendency of an investigation." *Federal Election Commission v. Illinois Medical Political Action Committee*, supra, at 46, citing H. Conf. Rept. No. 94-1057, 94th Cong., 1st Sess. 50, reprinted in [1976] U.S.Code Cong. & Admin.News 946; 122 Cong. Rec. 8566 (Mar. 30, 1976) (statement of Rep. Hays). As such, these subsections do not support RBC's argument that the final audit report must be made confidential.

[9,10] RBC also cites a provision of PECFA in reinforcement of its argument that confidentiality is required, which provides that "It shall be unlawful for any individual to disclose any information obtained under the provisions of this chapter except as may be required by law." 26 U.S.C. § 9012(g)(1). RBC argues that, with respect to information obtained in the

course of the audit procedure under 26 U.S.C. § 9007, PECFA, at 26 U.S.C. § 9009(a), authorizes disclosure only to Congress, and that such disclosure is limited to the amount of payments required and the reasons therefor. The FEC, however, contends that audit reports are in fact required by law to be made public, pointing to FOIA and section 9009(a) of PECFA.³ Certainly, it is difficult to find a mandate of confidentiality in section 9009(a). This section requires the FEC after each election to submit reports to Congress as to financial data of campaign committees receiving funds under PECFA. Nowhere does the statute suggest that Congress is to keep such reports confidential, and since the information that is the subject of these reports to Congress does not involve conciliation efforts or notifications or investigations under section 437g of FECA, neither do the provisions under that section compel Congress to guard the confidentiality of these reports. Indeed, the fact that each report submitted under section 9009(a) is required under that statute to be "printed as a Senate document" compels the conclusion that such reports were intended by Congress to be open to public view. Clearly, section 9009(a) evinces a purpose on the part of Congress to allow taxpayers who chose to direct a portion of their taxes to the Presidential Election Campaign Fund to know exactly how those tax monies are being spent. See, H.Conf.Rept. 92-708, 92d Cong., 2d Sess., 117 Cong.Rec. 44783 (Dec. 4, 1971), reprinted in [1971] U.S.Code Cong. & Admin.News 2077 (concerning requirement of all candidates to furnish periodic expend-

iture statements that would be made public by the Comptroller General).

Yet the interests protected by PECFA do not stop at the public's right to know how tax monies are distributed, but also embrace a concern for openness and accountability to the public in the operation of Presidential campaigns. The legislative history of PECFA demonstrates that allowing the voting public the opportunity for greater scrutiny of political campaigns was an equally important purpose of the act. Senator Pastore, a leading proponent of the bill that established the act, described the act thus: "... it requires frequent reporting and disclose [sic] of contributions and expenditures by candidates and their committees so that the electorate may know the source of a candidate's campaign funds and their distribution." 117 Cong.Rec. 41762 (Nov. 17, 1971). As was likewise noted during the same Congressional debates preceding enactment of the act, "the people of this Nation are demanding to know the sources of campaign financing, and they have a right to know from whence comes the 'mother's milk of politics.'" *Id.*, at 41767 (remarks of Sen. Bentsen).

[11, 12] Finally, as the FEC points out, the audit report, as a document created by the agency, is subject to mandatory disclosure under FOIA. 5 U.S.C. § 552. Again, no statute specifically exempts audit reports from disclosure under FOIA, and regulations promulgated by the FEC provide that it "will make the fullest possible disclosure of records to the public" including audit reports. See, 11 C.F.R. §§ 4.2, 4.4(a)(14), 3.2(a). As the FEC notes, the proviso "ex-

3. 26 U.S.C. § 9009(a) provides:

(a) Reports. The Commission shall, as soon as practicable after each presidential election, submit a full report to the Senate and House of Representatives setting forth—

(1) the qualified campaign expenses (shown in such detail as the Commission determines necessary) incurred by the candidates of each political party and their authorized committees;

(2) the amounts certified by it under section 9005 for payment to the eligible candidates of each political party;

(3) the amount of payments, if any, required from such candidates under section

9007, and the reasons for each payment required; and

(4) the expenses incurred by the national committee of a major party or minor party with respect to a presidential nominating convention;

(5) the amounts certified by it under section 9008(g) for payment to each such committee; and

(6) the amount of payments, if any, required from such committees under section 9008(h), and the reasons for each such payment.

Each report submitted pursuant to this section shall be printed as a Senate document.

cept as may be required by law" in section 9012(g)(1) must be read to incorporate FOIA's disclosure requirements.

[13] In light of the full opportunity for input into the audit process, the protections within FECA and PECFA against premature disclosure of information relating to violations of law, and the availability of judicial review, it is clear that the only interest that could be affected by publication of the report is RBC's concern about its reputation. However, this interest is not sufficient to warrant keeping the audit report in question secret especially when this particular report will not contain information implicating RBC with violations of law. Otherwise, information of this type that Congress has declared to be of important public interest never could be disclosed.

[14] It should not be overlooked that Congress has demonstrated a concerned intent that the acts' purpose of openness not be stultified by unnecessary delay in the publication of the audit reports and their presentation to the electorate for whose benefit their creation was mandated by law. Congress was troubled by the inability of the FEC to make prompt disclosure of the audit reports it prepared following the 1976 election, and it was this concern that ultimately prompted the Commission to adopt new procedures to streamline the audit process. During hearings before the Senate Committee on Rules and Administration, Senator Pell expressed his concern with the delays affecting the audit reports' production thus:

... if [the audit report] is delayed this year and goes on another six months, another year, we are into another campaign before we are through with the ... campaign, so there is no purpose in the whole operation, because nobody is interested in history. And this will become history before we are through.

... the purpose is for the public to know.

Transcript of Proceedings, Committee on Rules and Administration, United States Senate (Mar. 15, 1978), at 14, 16 (Exhibit 14

to Defendant's Opposition). The intent of Congress cannot be denied. Prompt disclosure of the audit reports to the electorate is essential to meeting the purposes of PECFA and FECA.

[15] The Supreme Court declared that the primary purpose of PECFA is "to limit the actuality and appearance of corruption resulting from large individual contributions." *Buckley v. Valeo*, 424 U.S. 1, 25, 96 S.Ct. 612, 637, 46 L.Ed.2d 659 (1976). As another court noted, "The purpose of the Federal Election Campaign Act is clear. Congress sought to insure the integrity of the election process by regulating the critical aspects of campaigning and campaign funding, and by opening up the whole area to informed scrutiny by the electorate." *Gifford v. The Congress*, 452 F.Supp. 802, 805 (E.D.Cal.1978). Certainly, these purposes of openness and accountability cannot be achieved if the financial operations of Presidential campaigns supported by tax monies are allowed to remain guarded from all public view. The public has a right to know, and promptly, how its monies are spent by Presidential campaign committees.

Consequently, for the reasons set forth in this Memorandum Opinion, RBC's motion for partial summary judgment to enjoin disclosure of the audit report by the FEC must be denied, and the FEC's motion shall be granted, dismissing without prejudice the claim as to the FOIA request and entering summary judgment for the FEC as to RBC's prayer for an injunction against disclosure of the audit report.

In light of the foregoing, it is, by the Court, this 17th day of November, 1981,

ORDERED, that the motion of Defendant Federal Election Commission to dismiss, or, in the alternative, for summary judgment, be, and hereby is granted, as to Plaintiffs' prayer for an injunction enjoining Defendant's continued withholding of documents sought by Plaintiffs under the Freedom of Information Act, by the dismissal of this prayer only, without prejudice.

An order of Judgment consistent with this Memorandum Opinion and Order shall be filed herewith.

E. J. Dionne Jr.

The Future Of the Presidency

So will the immunity deal Monica Lewinsky won for herself and her mother give us the opportunity to get this thing over with? Unfortunately, many political forces—on both sides and in both parties—have powerful interests in further delay.

Unfortunate, too, is the fact that the continuing investigation of President Clinton, and some of the president's own behavior, have already done great damage to our politics and our political institutions.

Why more delay? The president agreed on Wednesday to answer independent counsel Ken Starr's questions in a videotaped White House session on Aug. 17. This is sooner than Clinton wished but later than Starr wanted.

This gains Clinton at least some time to try to sort out what Starr has learned from Lewinsky and makes it likely that any report by Starr will land in the late summer or early fall. That would be just in time for the run-up to the midterm elections.

At that point, further delay will be in the interest of the Republicans. If Starr drops anything less than a smoking gun report on Congress, Republicans will want to calibrate its effect on the public. They also want to avoid looking as if they're playing politics with the presidency before the congressional elections.

There's also this: The last thing most Republicans want is President Gore running as an incumbent in 2000. The GOP's best option is a much weakened President Clinton serving out his term.

These are the forces conspiring to keep the country in a political swamp. And there are other problems. The first is the hash this case has made of our thinking about the "privilege" Secret Service agents and presidential lawyers enjoy in avoiding testimony in legal cases. Americans, for good and honorable reason, hate the idea of privilege, and there should be severe limits on its exercise. If a presidential lawyer is the president's bagman for accepting bribes, he shouldn't have legal protection. Secret Service agents have an obligation to report on crimes they witness.

But it's also true that if a president comes to view his Secret Service agents as potential human tape recorders who can be subpoenaed in all manner of cases, he'll push them away, at great potential cost to the country. If a president has no aide he can turn to for completely candid

advice in dicey times, the country—and not just the president—will suffer. Presumably after Clinton's term ends, we'll have to revisit these issues, both political parties thinking not about Richard Nixon or Bill Clinton but about the safety and the performance of future presidents.

The independent counsel statute is another victim of this case. In principle, it makes sense to create an office independent of the White House to look into cases in which the Justice Department has a clear conflict of interest. Over the years, many independent counsels have conducted fair, judicious and reasonably speedy inquiries that increased, rather than decreased, confidence in the judicial system.

But this case has shown how a process designed to protect justice from politics can become hopelessly embedded in the country's political battles. You don't have to believe in right-wing conspiracies to worry about how the Jones lawsuit and the Starr inquiry came to overlap—and how they may provide a road map for future efforts to undermine a presidency.

The biggest casualty, however, is the promise the Clinton presidency once held. The end of the deficit and the restoration of prosperity created an opening for increased confidence in government and the possibility that it might again be used to solve problems.

Clinton began the year with a chance to make that case. But six months have been squandered and cannot be recouped. It's not clear how Clinton can restore his authority to lead the effort he began.

Yes, you can blame that in part on the president's enemies. But at the very least the president fell into the trap they set. For that he is responsible. In our age especially, the private behavior of presidents has, ineluctably, public consequences.

In the current issue of *Commonweal* magazine, Rutgers professor, Wilson Carey McWilliams reminds us that the price of holding as powerful a responsibility as the American presidency may be "the president's willingness to sacrifice his or her private self while in office."

Perhaps that's too austere a standard. But whatever it takes—from future presidents and from their enemies—the country should never have to go through something like this again.

12029

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BE

**Anderson Report
on the
FEC Audit of the
1992 Clinton for President Committee**

July 1998

Volume Three of Five

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13001-13016: Documents pertaining to "overlimit" project carried out by Andersons.

Just as "privilege" is a defense of libel, so is truth. Thus, in addition to stating the false, defamatory statements were privileged communications, attorney for the CPC and Utrecht claimed what Utrecht had stated in the CPC's Interim Audit Response were true and therefore, defamatory or not, were not libelous. Several things were offered by Utrecht's attorney as "proof" that her defamatory statements were true, among them was Pat Anderson's so-called "overlimit" memo, written to Patty Reilly on October 6, 1992. A copy of that memo is in this section, identified as Doc 13009/E. The "overlimit" memo is discussed in Tab 2, Documentary With References, Sections 16, 17 & 18.

Simply put, POC obtained, at the request of the CPC staff, some 169 signatures from contributors who had inadvertently contributed varying amounts of money to the CPC "over the limit" of \$1000 allowed per person. The FEC allows the "overlimit" portion of the contribution to be redesignated to the Compliance fund if the contributor redesignates the overlimit amount within 60 days.

POC obtained the signatures but about 76 of them were not usable because the overage was part of a contribution which had been made outside of the 60-day window. Refunds were made of the overlimit portion of these contributions, as was the case for all other overlimit portions of contributions not redesignated. The remaining, usable redesignation statements obtained by POC represented \$34,585 in PROPERLY redesignated to the Compliance fund. (Audit Report, Tab 28, Doc 28094)

The CPC and Utrecht have attempted to turn POC's explanation about obtaining 76 unusable "overlimit" redesignations into an "admission" it obtained 38,000+ redesignations which the CPC staff obtained from Little Rock. Utrecht's attorney, John Keeney, stated the Andersons were "quibbling" by about the difference. The Andersons' reply: you bet!

Doc 13001&2/A shows the Andersons were calling the overlimit contributors, as stated.

Doc 13003-4/B shows that the CPC had asked POC to obtain overlimit redesignations.

(Note: the faxed instructions are from Patty Reilly, who was briefly doing dual duty for Clinton's red-hot campaign and Kerry's winding down campaign.)

Doc 13005&6/C shows Pat Anderson's final cover letter for the redesignations, which went out under POC letterhead.

Doc 13007&8/D shows Christine Varney's letter, in which she expressed "distress" that Pat Anderson attempted to salvage portions of contributions that had to be refunded otherwise.

Doc 13009&10/E shows Pat's memo of explanation about the unusable "overlimit" redesignations.

Doc 13011&12/F shows a memo from Pat Anderson written to her husband months later, when the overlimit issue resurfaced as a POC "error." (Discussed more fully in Documentary With References, Tab 2, Section 21.0 and 22.0.)

Doc 13013/G shows sample of POC's "overlimit" request but contributor preferred refund.

Doc 13014-16/FF shows the initial transmittal of overlimit redesignations from the primary bank account to the Compliance fund (GELAC). The subsequent refunds were made from the Compliance fund. Transfer was made early August 1992, nearly two months before CPC made its first transfer to the Compliance fund based on the redesignation statements obtained by its staff in Little Rock headquarters. See Tabs 6 and 7.

02-Apr-74

OVERLIMIT CONTRIBUTIONS AS OF END OF MARCH

NAME	PRIMARY ADDRESS	SECOND ADDRESS	\$AMT	DATE
Colburn, Janet NICK: Janet 1120 La Collina Road Beverly Hills CA 90210	Dr. 1120 La Collina Road Beverly Hills CA 90210	900.00 300.00	003 22 696 004 05 1025	S04 NA S04 NA
Compton, J. T. NICK: Mr. Compton 1401 East Branch Street Morrilton AR 72110	Mr. 1401 East Branch Street Morrilton AR 72110 OCC: Manager EMP: Jayco, Inc.	1000.00 50.00 50.00	004 05 1049 007 27 699 051 10 698	S04 AOF S04 NA S04 NA
Conard, Richard T. NICK: Richard	Dr. Post Office Box 14820 Bradenton FL 34280	2000.00	018 12 5034	S04 NA
Connolly, William F. NICK: William	Mr. The Boston Globe Post Office Box 2378 Boston MA 02107	1106.00	010 01 17917	S04 NA
Davis, Steven H. NICK: Steven Clubhouse Road Tuxedo Park NY 10987	Mr. Clubhouse Road Tuxedo Park NY 10987 OCC: Attorney	1000.00 500.00	017 12 5834 015 12 5973	S04 NA OK NA
Dillon, James J. NICK: James 182 Buckminster Road Brookline MA 02146	Mr. 182 Buckminster Road Brookline MA 02146 OCC: Attorney	500 250.00 1000.00	006 05 1562 007 30 2002 006 31 1642 018 22 1751	S01 NA MAX NA MAX NA MAX NA
Durham, Sylvie A. NICK: Sylvie	Ms. 1029 Papermill Court, North West Washington DC 20007	500.00 1000.00	018 22 902 003 18 923	S04 NA S04 NA
Earhart, John NICK: John 412 North Coast Highway Number 345 Laguna Beach CA 92651	Mr. 1/2 SXA John 1/2 XAS Anne 412 North Coast Highway Number 345 Laguna Beach CA 92651 OCC: Chairman EMP: Global Environment Fund	2000.00	003 29 1522	OKA SXA

13001

13-A

02-Apr-82

OVERLIMIT CONTRIBUTION AS OF END OF MARCH

5

NAME

PRIMARY ADDRESS

SECOND ADDRESS

SAMT

DATE

Ernett, Alfred Erwin

NICK: Alfred

908 North Van Deventer Fayetteville AR 72701
OCC: Landscape Architect
EMP: University of Arkansas

LAF 25 1000

911003 013 09 4306 S01 MA
911118 003 03 437 S01 XAFF

Errod, John R.

NICK: John

Route 3, Box 231-F Silliam Springs AR 72761

1000 Georgia

911209 012 09 10826 S02 MA
920309 006 08 10922 MAX MA
920330 015 14 10945 OK MA

Epstein, Lawrence

NICK: Lawrence

470 West End Avenue New York NY 10024
OCC: Attorney
EMP: Newman, O'Malley & Epstein, P.C.

SPOU: Elrod, Georgia

920211 004 11 240 S04 MA
920311 028 09 0234 MAX MA

Fallon, Gerald A.

NICK: Gerald

Georgian Manor Bratenahl OH 44108

LAF 201

911217 001 10 271 S02 MA
920115 003 07 296 S03 MA

Farmer, Alec

NICK: Alec

Post Office Box 1794 Jonesboro AR 72401

LAF 117

920211 001 03 425 OKA DA
920211 017 32 CASH DHS CASH

Fisher, Lucy

NICK: Lucy

405 South Beverly Drive Number 440 Beverly Hills CA 90212
OCC: Executive Vice President - Feature Prod.
EMP: Warner Brothers

LAF 35

911216 016 03 2709 OKR ADF
920305 006 18 2914 DNS MA
920327 009 12 1877 OK MA

Fuchs, Stuart
NICK: Stuart

161 East Chicago Number 31A Chicago IL 60611

SUD

911213 011 29 728 S02 MA

Garcia, Karen J.

NICK: Karen

2222 Carmichael Drive Vienna VA 22181
OCC: Business Development
EMP: Advanced Technology Systems

LAF 0

920124 020 07 616 S04 MA
920227 004 10 644 S04 MA

KERREY

For President

FAX COVER SHEET

TO: Pat Anderson
POC

FAX NUMBER: [REDACTED]

FROM: _____

TOTAL NUMBER OF PAGES (Including this sheet):

CALL TO CONFIRM: _____

MESSAGE: This is the 2nd draft. Please
fax to me (215- [REDACTED]) & Christina
in final before you send it
out. Thanks -

PR

13003

13-B

99-04-393-1723

#2

LOGO

Name
Address

Salutation:

Thank you once again for your generous contribution[s] to Clinton for President. As we discussed in our [date] telephone conversation, it appears that [amount] of your contribution[s] may exceed the \$1,000 per person limitation to a presidential primary election. The Federal Election Commission permits the amount of your contribution in excess of \$1,000 to be redesignated to the Compliance Fund, a political committee founded to assist Governor Clinton's campaign with compliance with all applicable laws during the general election. It is our understanding that you wish to further assist Governor Clinton by contributing to this fund. You may, however, request a refund of this amount.

By completing the attached affidavit and returning it to us in the stamped, self-addressed envelope, we will be able to put your contribution to work for the general election Legal and Accounting Compliance Fund. Thank you once again for your assistance.

Sincerely,

Signature

I have been requested by the Clinton for President Committee on [date] to redesignate [amount] of my contribution to the Compliance Fund of the Clinton for President General Election Committee, and agree to do so.

Name

Contact Date

13004

13-B.2

05.04.253.1724

- \$date -

-pref- -reversename-
-titl-
-bus-
-ad1-
-ad2-
-cit-, -st- -zip-

Dear -pref- -last()name-:

Thank you once again for your generous support of the Clinton for President Committee.

Your total contributions have exceeded the per person limit stipulated for the presidential primary election by the Federal Election Commission . As we discussed, you may redesignate the amount over \$1000 to the general election Legal and Compliance Fund or you may request a refund.

It would further assist Governor Clinton's campaign if you would please verify the attached statement by signing and returning it in the enclosed, self-addressed envelope at your earliest convenience. This is all you have to do to redesignate your contributions over \$1000 to the compliance fund.

If you have any questions or concerns, please give me a call at 202/675-4900. We are sorry to have to bother you. Thank you for your cooperation.

Sincerely,

Pat Anderson
Compliance Clerk

[B

Public Office Corporation is a computer service organization that specializes in contributions database management and Federal Election Commission reporting for Democratic candidates.

-Schr12-

13005

13-C

This is the cover letter that accompanied the Redesignation Affidavit we sent out. Pat Anderson

Contribution Redesignation Statement

Please redesignate my contribution in the amount of \$ _____
to the Clinton for President general election Legal and Compliance Fund.

=pret= =reversename=

Date

13006

9211 565 40 66
99 04 393 1726



10/3
M. K. 129

Pat Anderson
Public Office Corporation
911 2nd Street, N.E.
Washington, D.C.

Dear Pat:

Thank you for meeting with us on September 24, 1992. As we discussed, there are a number of tasks we need to accomplish as we close the primary committee and prepare for the audit. As we agreed, any and all contact with the Federal Election Commission will be exclusively with the campaign.

First, we will provide the Federal Election Commission auditors with the file layout of the contribution file. We received this from you on September 30th.

Second, we have received a partial list of contributions redesignated from the primary committee to the GELAC Fund. We are distressed to learn that contributors were instructed to back date their redesignation. In some instances, this resulted in redesignations dated months before the compliance fund was opened and months before the redesignation was, in fact, made. Of course we are immediately refunding all excessive contributions not properly or timely redesignated. In order to minimize the campaign's potential liability for these contributions, please provide a written explanation regarding these excessive contributions for our files.

Finally, we must amend the primary reports. We have agreed to the following division of responsibilities:

1. You will provide to the campaign a printout of all Schedule G activity by individual and a summary list of all "IC" contributors.
2. We will provide the primary debt schedule and voided check identification.

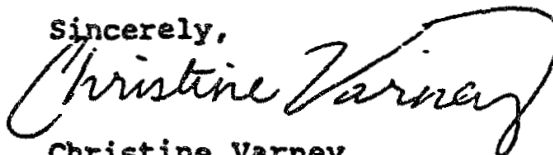
13007

13-D

3. We will jointly create the monthly cash reconciliation and elimination of all previously unidentified items.

We will work with your staff to amend the reports. I am sure you understand the urgency of completing the amendments. In any event, all amendments to the primary reports must be completed by October 31, 1992.

Sincerely,



Christine Varney

cc: David Watkins
Lyn Utrecht
Keeley Ardman
Patty Reilly

13008

99.04.393.1728

TO: Patty Reilly

FROM: Pat Anderson

DATE: 10/6/92

RE: Management of the redesignation of overlimit contributions to GELAC

Patty, it is obvious, though you have been calm about it, that you are not happy with the way that POC managed the obtaining of affidavits to redesignate overlimit contributions to the GELAC. And today I got a letter from Christine Varney stating that she is distressed about the statements obtained from contributors.

First of all I would like to say that I am very sorry to cause any additional stress on anyone. I know things have been at a hectic plateau for months and months. Also, I have seen the effects of well meaning, independent action gone sour and I regret this situation might fall in that category.

I would like to recount my actions and assumptions regarding POC's management, and, perhaps, it will at least document what and why things happened the way they did.

- Our procedure has been to resolve overlimit and reattribution issues and obtain necessary documentation on a monthly basis.
- In order to achieve compliance and maximize the next matching funds report, we typically generated our affidavits the day after the last submission was made. This kept everything current.
- We have some telephone logs dated as early as March 19, 1992, where we discussed overlimit conditions with contributors and the option of getting a refund or redesignating the overlimit amount to the legal and compliance fund that was to be setup.
- Where the contributor opted for a refund, we sent it to Little Rock for a refund; where the contributor gave us new information regarding the correct attribution, we set that up and sent out a request for the appropriate affidavit; where the contributor wanted to apply the overlimit amount to the upcoming legal and compliance fund, we so noted it and marked the computer.
- I do not know the exact date the legal and compliance fund was setup but it was about the same time that the deluge of contributions began. (On May 29th nearly 10,000 different checks were put into the bank and the volume did not let up until September!)
- I do recall my trip to Little Rock in early June; you and I sat down and went over the excessive listing; we added up the amount by hand and I believe it was around \$7800.
- I remember also talking to Christine one day around that time and assuring her that the excessives would not be an issue because we were preparing a set of affidavits; I told her that I thought (correctly) that most everyone we had talked to would return their affidavit redesignating the excess.

13009

13-E

- At this time, I wrote a cover letter to the applicable contributors referring to our earlier conversation about redesignation; I also re-stated in this letter the fact that they could request a refund if they wished; I prepared the redesignation statement with the amount to be redesignated already filled out; I requested the contributor to date the statement as of the date of their last contribution -- this is the date that made them "overlimit" by whatever amount.
- It seemed perfectly reasonable to me to do this. All of these people had been talked to before. Almost without exception they were most anxious that the campaign derive maximum benefit from their contribution(s). In most instances they did not realize that they were overlimit. Thus, it was evident the contributors wanted to do whatever was legally proper to see that their money helped Governor Clinton.

In retrospect, I should have sought professional counsel on such factors as dating the redesignation of excessives and the interplay between that and the GELAC fund opening. I am sorry that I did not.

13010

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TO: Bill Anderson
FROM: Pat Anderson
RE: Issues about POC "errors."

July 9, 1993

(1) ISSUE REGARDING "BACK-DATED" AFFIDAVITS.

13-E
Attached is a memo I wrote to Patty Reilly for the record regarding the way we managed the affidavits.

I wrote the memo in such a way as to take on as much responsibility for it as possible -- clearly we acted on our own, as we have in so many ways throughout this campaign.

I would say that I had every reason to believe that the management of the affidavits was correct because we did not ask the contributor to back date anything, we referred to the date as the "as of date" because it was the date that the overlimit contribution was made.

In reality, the real problem with the affidavits was that the Clinton campaign attorneys failed to establish the Legal and Compliance fund in a timely manner -- I had been told several months earlier by Phil Friedman that the fund was "in the works" -- that's the only reason we continued to call people about the upcoming fund and asked them to date their affidavit as of the date the offending contribution was made. Because the fund was so late in being established, the transfer date to the fund from the general acct was beyond the allowed time.

The "charge" for this activity came under our standard, fixed amount paid to us for each check unit. No separate charge, no telephone bills, and no staff time was charged additionally for our management of these affidavits.

(Bill, better check out our invoices to make sure notations were not made on them to conflict with above statement.)

(2) ISSUE REGARDING JULY 1992 REPORT OVERSTATED BY \$200,000.

Looking back at the figures in our working papers and the spread sheets (which were correct), we believe the error must have been a typographical error that was not caught at the time.

We regret the typo but do not charge extra for them. As for the extra work relating to that error, there was very little "extra" work on the part of anyone to resolve that error inasmuch as every single FEC report and schedule were reviewed in the same manner by the Arkansas staff; we might add that with one or two exceptions, all reports balanced exactly or within a tiny (pennies) amount. We are very proud of that record given the fact that we have no source documents in this office and given the fact that we NEVER had a balancing figure from the accounting department against which to balance. NEVER.

13011

13-F

(3) ERROR REGARDING PAYMENTS TO WORTHEN NATIONAL BANK.

The only thing I can think of is the situation where the Committee, during the early, start-up days, wrote several checks to themselves and deposited them into the payroll account (rather than transfer money to the payroll account by an interaccount transfer). By the time we became involved with the Committee, I believe the practice had been discontinued. When I saw this prior activity, I realized, as did they, that that care had to be taken on the 4th QTR report so that expenditures would not be overstated.

As a result, the FEC report itself was correct -- expenditures were not overstated -- I allowed for the unusual management. Also, the check(s) was listed on the schedule B, along with the other checks written by the Committee, as it should have been. What we failed to do was simply make those entries on the Schedule a "memo" type entry. As I recall, no one noticed it until the FEC, seeing the obvious, reminded the Committee of the proper way to make a memo entry on Schedule B.

This oversight "error" was of no consequence to the committee whatsoever because the figures on the 4th QTR report were correct, only the Schedule B hadn't been marked with the memo notation.

Certainly, no charge was made for something we failed to do.

(4) ISSUE OF AUDIT TAPES FOR THE FEC - WAS THE COMMITTEE CHARGED TWICE?

The Committee was charged only for production of the tapes that should have been sent to the FEC; at no time has the committee ever been charged twice for production of any product where only one set was requested. POC invoices would bear this out.

(5) Pat is not aware of any "errors" committed by POC. It must be obvious from our record that every effort was made (1) to determine the correct way to handle the data in the reporting area; (2) to ensure proper controls and management of the data; and, (3) initiate and design programs and procedures that would simplify management but ensure accuracy of the data -- time and time again, month after month.

POC information is regarded as the source of balancing data rather than the accounting department. With, we believe, one exception, out of over \$35 million dollars of transactions, our spread sheets were perfectly accurate and kept the accounting department in line rather than the other way around, over and over again.

If other words, the leadership we have continually demonstrated, the reliability of the data we were responsible for (for which we had no source documents), and the timeliness of delivery of reports to the FEC and support materials to the Committee (under extremely heavy volume), is a record for which we are ENORMOUSLY PROUD.

We are sorry you find it necessary to solicit our guarantee that the Committee has not been charged for our "errors." But, nevertheless, we are happy to state, unequivocally, that the Clinton for President Committee has not been charged for errors and that, in fact, per item of data, number of documents managed, and products delivered, not to mention reliability, we would venture that the Committee has received the best value for services performed than any of the service providers to that Committee, past or present.

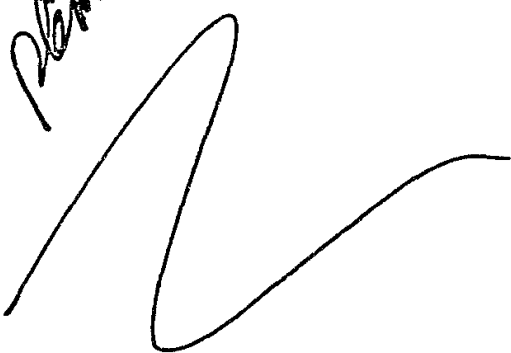
Contribution Redesignation Statement

Please redesignate my contribution in the amount of \$ 50.00
to the Compliance Fund of the Clinton for President General Election
Committee.

Mr. Frank W. Lewis, Jr.

Date

*Send Michael
Please!*



13013

13-G

99-044-393-1733

(From POC)

PEC obtained only
"over limit" redesign via your system.

✓ hist "Q"

TRANSFERS
to GELAC
on 8.11.92
based on

"over limit"
\$ in primary
account.

LAYEE, MARY
were Refund
having Deto
\$34,585 in
GELAC.

REPORT TITLE: GENERAL ELECTION COMPLIANCE FUND TRANSFER #1

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(0, 10495)	<>GAOF1	<>GEN	<>G	<>920124	<>3	<>4693	<>500.00	<>Altschul, Arthur G.	Mr.
(0, 383)	<>GAOF1	<>GEN	<>G	<>920407	<>4	<>238	<>500.00	<>Altshuler, Fred H.	Mr.
(0, 7794)	<>GAOF1	<>GEN	<>G	<>920406	<>15	<>4626	<>500.00	<>Baker, D. Jansing	Mr.
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(0, 1444)	<>GAOF1	<>GEN	<>G	<>920130	<>28	<>0323	<>250.00	<>Barnes, Ben F.	Mr.
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13014

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0, 158.	<>GAOF1	<>GEN<>G<>920325	<>	3->622	<>	250.00<>Horl.	<>	Kathryn Mann	<>Mrs.
0, 1781)	<>GAOF1	<>GEN<>G<>920519	<>	21->3080	<>	500.00<>Hubbard,	<>	Joan Date	<>Mrs.
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0, 11871)	<>GAOF1	<>GEN<>G<>920225	<>	16->887	<>	500.00<>Kuehne,	<>	Charles J.	<>Dr.
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0, 2163)	<>GAOF1	<>GEN<>G<>920527	<>	9->1659	<>	42.00<>Levy,	<>	Judith J.	<>Mrs.
0, 28778)	<>GAOF1	<>GEN<>G<>920520	<>	18->197	<>	350.00<>Lord,	<>	Denny D.	<>Mr.
0, 20808)	<>GAOF1	<>GEN<>G<>920430	<>	24->1625	<>	70.00<>Luther,	<>	Agnes	<>Mrs.
0, 13906)	<>GAOF1	<>GEN<>G<>920318	<>	8->1275	<>	1000.00<>Maddrey,	<>	E. Erwin	<>Mrs.
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0, 12707)	<>GAOF1	<>GEN<>G<>920501	<>	15->CC8390	<>	100.00<>Martin,	<>	Dan	<>Mr.
0, 2127)	<>GAOF1	<>GEN<>G<>920121	<>	7->2259	<>	250.00<>Meaney,	<>	Francis X.	<>Mr.
0, 4663)	<>GAOF1	<>GEN<>G<>920515	<>	11->0949	<>	450.00<>Meeks,	<>	Brenda R.	<>Mrs.
0, 5996)	<>GAOF1	<>GEN<>G<>920421	<>	3->00450	<>	100.00<>Mitchum,	<>	Johnny B.	<>Mr.
0, 9671)	<>GAOF1	<>GEN<>G<>920309	<>	3->1566	<>	1000.00<>Montgomery,	<>	Susan Byrne	<>Mrs.
0, 14780)	<>GAOF1	<>GEN<>G<>920520	<>	11->180	<>	250.00<>Moon,	<>	Richard T.	<>Mr.
0, 1213)	<>GAOF1	<>GEN<>G<>920213	<>	18->CC7958	<>	150.00<>Moore,	<>	John	<>Mr.
0, 7608)	<>GAOF1	<>GEN<>G<>920316	<>	8->1642	<>	1000.00<>Moore,	<>	John	<>Mrs.
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0, 13310)	<>GAOF1	<>GEN<>G<>920521	<>	21->2154	<>	100.00<>Potter,	<>	Earl	<>Mr.
0, 6377)	<>GAOF1	<>GEN<>G<>920219	<>	20->117	<>	100.00<>Preuss,	<>	Peter	<>Mr.
0, 11794)	<>GAOF1	<>GEN<>G<>920424	<>	4->2208	<>	100.00<>Pugh,	<>	Jr., James H.	<>Mr.
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0, 1833)	<>GAOF1	<>GEN<>G<>920530	<>	14->184	<>	100.00<>Roy,	<>	Sukumar	<>Dr.
0, 16639)	<>GAOF1	<>GEN<>G<>920311	<>	13->259	<>	250.00<>Roy,	<>	Sukumar	<>Dr.
0, 17038)	<>GAOF1	<>GEN<>G<>920212	<>	9->8474	<>	300.00<>Rushfield,	<>	Leonard H.	<>Mr.
0, 28928)	<>GAOF1	<>GEN<>G<>920519	<>	21->1503	<>	200.00<>Sagan,	<>	Barbara D.	<>Mr.
0, 28928)	<>GAOF1	<>GEN<>G<>920519	<>	21->3394	<>	25.00<>Salmanson,	<>	David M.	<>Mr.
0, 28928)	<>GAOF1	<>GEN<>G<>920519	<>	21->3394	<>	100.00<>Schutz,	<>	J. J. J. J.	<>Mr.

13015

only list of overlimit
 Redesignations obtained
 By POC -
 From POC

Anderson Report - Tab 14

14003-14122: Documents showing \$\$ transferred based on redesignation statements

The documents in Tab 14 make two things very clear:

- (1) The CPC made the transfers based on batches of redesignation statements and not on an "analysis" as stated by Lyn Utrecht.

- (2) As transfers based on batches of signed statements were made, the CPC and/or Compliance fund staff in Little Rock (LR) re-computerized the redesignation data and sent each computerized list. The object of the "reconciliation" project was to give to POC lists of the contributions "being shifted" so that the original contribution record as entered by POC staff on POC's computer, could be coded as being REdesignated to the Compliance fund. POC worked to "reconcile" the Compliance computer data with the "original" data on POC's computer.

Therefore, it can again be stated once again:

POC was not the entity which "treated [the contributions] as 'redesignations' even though they were not" as Lyn Utrecht asserted in the CPC response.

It was the CPC itself which sought and obtained the redesignation statements, using its staff and other resources in Little Rock, thus "treating" the contributions as redesignations. Upon receipt of the signed statements, the LR staff assembled them into batches and made transfers from the primary bank accounts to the Compliance fund bank accounts based on the sum of the contributions in each batch or combination of batches (as sent to POC).

Document Description:

- | | |
|---------|---|
| 14003/A | Letter in which Pat Anderson requests to be advised of contributions "being shifted" to the Compliance fund. |
| 14005/B | POC report showing summary data of the various batches that made up the transfers. |
| 14006/C | Summary page from final reconciliation report showing date of transfers from both GOA and Suspense accounts, the amount of transfer, contribution code (correlated to list from LR), etc., etc., appear on summary. |
| 14007/D | POC manual log of incoming lists of redesignated contribution as they were received from LR headquarters
Refer to Doc 14122 for example of LR staff's log |
| 14008 | Page marking beginning of documentation representing contributions transferred from the GOA account |

14000

14009 1st page of List 3 - LR's computerization of redesignations
 14010 Last page of List 3
 14011 1st page of POC's report showing each contribution marked as being shifted
 14012 Last page of POC's List 3 report
 14013 Recap of reconciliation List 3

 14014 1st page of List 5 - LR's computerization of redesignations
 14015 Last page of List 5
 14016 1st page of POC's report showing each contribution marked as being shifted
 14017 Last page of POC's List 5 report
 14018-20 List Z - LR's computerization of redesignations
 14021-22 POC's report showing List Z contributions marked as being shifted
 14023 Recap shows List 5 + List Z missed by \$36.56 reconciling to transfer
 from primary to Compliance on 10-15-92 of \$192,172.98

 14024-28 List 6 Scenario

 14029-32 List 7 Scenario

 14033 List W from LR
 14034 List X from LR
 14035 Available documentation for List 7
 14036 POC's reconciliation of List W
 14037 List Y from LR
 14038 Recap showing List 7 + List X + List W + various categories
 is still \$600.00 off the mark. This was a particularly difficult
 group of contributions to reconcile.

 14039&40 1st page & 1st page from List D
 14041 POC report summarizing "D" and referring to "their" figure
 14042 Example of detail work POC went through to balance with data from LR
 14043&44 POC's reconciliation of List D
 14045 Recap of reconciliation data; out by \$523.00

 14046 POC's reconciliation of List M - source docs from LR not available

 14047 Page marking the beginning of documents relative to transfers
 from the "suspense" account

 14048-52 POC's List E reconciliation - balances perfectly - List E
 source "batch" from LR is in Tab 6 of the Anderson Report
 14053 No recap, none needed as in perfect balance

 14054&55 1st and last page of List 4 as sent from LR
 14056&57 1st and last page of POC's reconciliation
 14058 Shows a much "cleaner" list; out only \$960.12 from \$251,608.88
 transfer.

14001

14059-61 List 8 as received from LR
 14062-65 Shows "working" papers as POC staff literally checked out each contribution
 14066 Working paper from List 8
 14067&68 POC's reconciliation of List 8
 14069 Recap of List 8 - shows perfect balance

 14070&71 1st and last page of List 9 from LR
 14072&73 POC's reconciliation, 1st and last page
 14074 Recap of list 9, shows perfect balance

 14075&76 1st and last page of List Zero
 14077&78 POC's reconciliaton, 1st and last page
 14079 Recap of List Zero, shows perfect balance

 14080&81 1st and last page of List A from LR
 14082&83 POC's reconciliation
 14084 Recap of List A, out by \$249.91

 14085&86 List B from LR; the only report that had a total at the bottom
 14087&88 POC's reconciliation list
 14089-92 Recap of List B; LR had an enormous number of dupes on this transfer; still POC balanced within \$350.00 on a \$336,904.37 transfer

 14093&94 List C from LR
 14095&96 POC's reconciliation report of List C
 14097 Recap; out by \$2955.00

 14098&99 List Y from Little Rock
 14100&01 POC's reconciliation
 14102 Recap of List Y

 14103-13 List S from LR
 14114&15 POC reconciliation list
 14116 No documents available for List S recap

 14117-19 List J from LR
 14120 POC reconciliation report
 14121 No recap necessary, in balance

 14122 Example of log of "lists" sent from LR staff; note that this log shows that lists were "combined" to make a single bank transfer. This document clearly connects bank transfers with the redesignation lists sent to POC. This is a very important document.

14002

Public Office Corporation

911 Second Street, N.E.
Washington, D.C. 20002
202 675-4900 / Fax 675-4911

September 10, 1992

Mr. David Watkins
Clinton for President Committee
123 West Third Street
Little Rock, Arkansas 72202

Dear David:

When I wrote to you on July 22nd, I said, "The number of contributions has passed 100,000 and may be headed for nearly double...." I underestimated, for now the figure has passed 200,000 and is headed for around 250,000 when all the compliance work is finished.

I point out these facts for two reasons. First, I am glad to report that the unexpectedly high volume again makes it possible to reduce our unit prices. With the last half of August bill, which you will receive shortly, we are cutting another bit from our per contribution price -- down to \$1.75, as opposed to the \$1.85 per our July reduction and as opposed to the \$2.50 pre-July price. The two reductions result in a savings to the Committee of over \$30,000 for the last half of August alone.

Similarly, we are cutting our price for thankyou letters by another 20%.

We are proud that we can offer these reductions, particularly in light of the huge surge in volume which required us to go to three shifts, seven days, to increase and train staff accordingly, and to buy and install a lot of new hardware.

Second reason to talk about database volume. Being database people, we are probably more sensitive to the care and use of same than most people. Because it was not our work but that of the Committee that brought in the money, I can say without undue bragging that the Clinton Committee has a magnificent database. It is large, it is detailed, and it is accurate. It should be so-maintained.

Thus, without any further charge to the Committee, we are going through a double-check process to seek out and tie down any remaining loose ends. Also, we have recently done a computer-rebuild as a step toward continued efficient functioning of the database. Speed of processing is very important in view of the size and the very large number of requests for products by the Committee and by the DNC.

What else needs to be done? Two things, I suggest, and we will do them with the lowest of costs, if you want us to.

14003

14-17

We understand that the Committee is anxious to exert an effort to obtain occupation/employer data from contributors who have not yet furnished same. We will be glad to write a nice letter to each such contributor soliciting this information and incorporate the results into the database, if you would like us to.

Next, regarding the results of the effort to reattribute contributions to the general election compliance fund. We suggest that the records of those accepting this option be noted appropriately so that the Committee will have complete contributor data in one central file. We will do this for very low cost if provided a list or tape of the contributions being shifted. In addition to the importance of complete individual data for compliance reasons, the file could be readily useful in case it is unexpectedly necessary to submit additional matching funds requests.

In closing, and as the campaign goes into the home stretch, we want to express our appreciation for the confidence that you and your team have shown in us, and to assure you that we stand ready to help in any way we can toward a big win in November!

Sincerely,

Patricia W. Anderson
President

cc: Keeley Ardman
Patti Reilly

14004

KEYFILE NAME: EVERY_PTSA.KEY 20-Aug-93 REPORT TITLE: CHECK EVERY_PTSA

Break: 0+G	40,481.30	(475)
Break: 1+G	2,795.00	(15)
Break: 1+P	22,068,128.72	(X194240)
Break: 1+S	462,515.23	(6382)
Break: 3+G	713,225.55	(14823)
Break: 4+G	249,583.76	(2677)
Break: 5+G	146,206.12	(2868)
Break: 6+G	62,118.00	(1213)
Break: 7+G	54,000.00	(80)
Break: 8+G	22,156.00	(197)
Break: 9+G	195,154.03	(2453)
Break: 9-S	50.00	(3)
Break: A+G	25,755.39	(248)
Break: B+G	326,218.37	(7626)
Break: B+P	300.00	(3)
Break: C+G	206,137.56	(2485)
Break: D+G	18,192.68	(381)
Break: E+G	27,691.51	(280)
Break: F+P	1,370.00	(36)
Break: F+S	25.00	(1)
Break: I+P	500.00	(1)
Break: J+G	4,627.00	(25)
Break: M+P	12,615.00	(84)
Break: Q+G	61,615.50	(168)
Break: S+G	13,825.43	(122)
Break: W+G	15,050.00	(35)
Break: X+G	4,000.00	(12)
Break: Y+G	176,997.67	(2634)
Break: Y+S	125.00	(2)
Break: Z+G	47,710.00	(189)
Grand Total:	24,959,169.82	(239758)

8-11-92

- 6% limit checked after
34,982 - 56%
36-6 of 103 = 94

14005

14-B

04 04 343 1742

Transfers Out of General Operating Account (GAO)

The following pages show the contributions represented in batches of redesignation statements which Little Rock staff received for contributions that had been deposited in the regular General Operating Account (GAO).

The Little Rock staff computerized the data on the redesignation statements and sent the computerized information to Pat Anderson at POC so that the contributions being shifted to the Compliance fund could be so noted in the original contribution records on POC's computer. This process was managed by Barbara Yates and Allen Wegehoft in Little Rock.

Represented are Lists 3, 5+Z, 6, 7+W+X, D, S, and M.

14008

F

99-04-393-1745

1st Page of List "3" From Little Rock

CA90265-	Malibu	25.00	08/11/92	6401
PA19130-	Philadelphia	100.00	08/13/92	1813
HJ07764-	West Long Branch	500.00	08/12/92	2605
TX76010-	Arlington	10.00	08/10/92	6248
IL60635-	Chicago	50.00	08/17/92	937
CA90274-	Rancho Palos Verdes	20.00	08/17/92	6401
KS66054-	Mc Louth	5.00	08/10/92	2442
KS66054-	Mc Louth	10.00	08/06/92	2631
VA98482-	Vancouver	25.00	08/10/92	2941
VA24019-	Rosnoke	25.00	08/07/92	0368
VA24019-	Rosnoke	25.00	08/07/92	2669
CA94619-	Oakland	15.00	08/11/92	0694
AL35216-	Birmingham	100.00	08/11/92	2386
TX79413-	Lubbock	20.00	08/17/92	6576
TX79413-	Lubbock	50.00	08/10/92	8558
FL33066-	Coconut Creek	25.00	08/10/92	2414
NY11554-	East Meadow	25.00	08/10/92	1911
NY10471-	Bronx	30.00	08/11/92	4337
NY10033-	New York	10.00	08/14/92	2694
NY13066-	Fayetteville	20.00	08/11/92	3311
CA95129-	San Jose	50.00	08/07/92	505
CA95472-	Sebastopol	250.00	08/06/92	5093
FL33319-	Fort Lauderdale	10.00	08/14/92	381
CA91607-	North Hollywood	10.00	08/07/92	4343
FL34293-	Venice	25.00	08/13/92	358
KY40601-	Frankfort	15.00	08/13/92	1745
MA01075-	South Medley	250.00	08/13/92	1578
SC29676-	Salem	100.00	08/06/92	2977
VA22153-	Springfield	10.00	08/14/92	7202
FL33162-	North Miami Beach	25.00	08/17/92	3535
FL33064-	Pompano Beach	40.00	08/11/92	3936
FL32205-	Jacksonville	10.00	08/13/92	469
NY12037-	Chatham	100.00	08/18/92	0901
FL33544-	Zephyrhills	50.00	08/10/92	3228
NY10573-	Port Chester	10.00	08/10/92	2333
CA90274-	Rancho Palos Verdes	10.00	08/07/92	1565
CA91911-	Chula Vista	100.00	08/06/92	556196
VA22207-	Arlington	30.00	08/14/92	2886
AZ85250-	Scottsdale	5.00	08/13/92	294
NY10028-	New York	100.00	08/11/92	3590
FL3417-	West Palm Beach	5.00	08/06/92	4083
CA90720-	Los Alamitos	50.00	08/11/92	4638
GA31210-	Macon	50.00	08/12/92	1125
AL35605-	Montgomery	10.00	08/11/92	2614
OR97411-	Clatsop	10.00	08/10/92	6837
MI48219-	Detroit	10.00	08/13/92	164
TX78741-	Austin	5.00	08/10/92	406
PA19363-	Okford	40.00	08/06/92	1856
TX9374-	Portland	40.00	08/07/92	1321
IN47842-	Clinton	25.00	08/13/92	5680
MO65203-	Columbia	25.00	08/12/92	105
IN46776-	New Haven	75.00	08/11/92	2714

\$ + Mrs. [unclear] - 10-5-92 # 715, 701.52

31851 Seafield Drive	Apartment P106
2401 Pennsylvania Avenue	
10 Nancy Drive	
Post Office Box 3521	
1805 North Nashville	
3564 Coolheights Drive	
Rural Route 1, Box 26	
Rural Route 1, Box 26	
4619 NE 112th Avenue	
8266 College Drive, Northwest	
8206 College Drive, N. M. V.	
5018 Leona Street	Vestavia
2108 Ridgeview Drive	
2509 62nd Street	
3306 37th Street	
2403 Antigua Circle	Number E3
1429 Garfield Road	
5800 Arlington Avenue	
140 Cabrini Boulevard	
3 Short Road	
4901 Country Lane	
1702 Barlow Lane	
3751 Environ Boulevard	
5808 Wilkinson Avenue	
919 Palmetto Drive	
314 Cardinal Avenue	
19 Stanton Avenue	
3 Commodore	
7596 Seabrook Lane	
640 Northeast 176th Street	
1140 Northwest 49th Street	
265 Lane Avenue South	
HC-1, Box 5 Browning Hill Road	Lot 1008
7122 West Drive	
52 Rock Ridge Drive	
3200 West La Rotonda	Number 316
1660 Delmonte Avenue	
2509 North Mc Kinley Street	
5982 North 83rd Street	
124 East 84th Street	
Dorchester 1	Number 209
11562 Loch Lomond Road	
116 Wolf Creek Drive, North	
13 - 31st Street East	
790 Southwest Kensington	
16193 Woodbine	
1507 Summit	
1300 Jackson School Road	
108 Timber Trail	
Rural Route 1, Box 120	
2604 Grant Lane	
1010 Bell Avenue	

Generated from POS

Benice E.	31851 Seafield Drive
Geraldine	2401 Pennsylvania Avenue
James G.	10 Nancy Drive
Jephthah Anozie	Post Office Box 3521
Elfot W.	1805 North Nashville
Charles G.	3564 Coolheights Drive
Judith	Rural Route 1, Box 26
Judith	Rural Route 1, Box 26
Nancy L.	4619 NE 112th Avenue
Shannon G.	8266 College Drive, Northwest
W. R.	8206 College Drive, N. M. V.
Deborah	5018 Leona Street
Ann G.	2108 Ridgeview Drive
J. L.	2509 62nd Street
Byron R.	3306 37th Street
Edith	2403 Antigua Circle
David J.	1429 Garfield Road
Joseph	5800 Arlington Avenue
Gerard	140 Cabrini Boulevard
Harriet S.	3 Short Road
Judith Anne	4901 Country Lane
Anna M.	1702 Barlow Lane
Henrietta	3751 Environ Boulevard
Jack	5808 Wilkinson Avenue
Jack B.	919 Palmetto Drive
Mussetta L.	314 Cardinal Avenue
Robert M.	19 Stanton Avenue
Sarah W.	3 Commodore
Mark A.	7596 Seabrook Lane
Robert S.	640 Northeast 176th Street
Rudolph	1140 Northwest 49th Street
Joseph J.	265 Lane Avenue South
Miriam H.	HC-1, Box 5 Browning Hill Road
Cathy Lynn	7122 West Drive
Lina	52 Rock Ridge Drive
Charles	3200 West La Rotonda
Jessie R.	1660 Delmonte Avenue
Edward P.	2509 North Mc Kinley Street
Samuel	5982 North 83rd Street
Guendolyn J.	124 East 84th Street
Irene R.	Dorchester 1
James S.	11562 Loch Lomond Road
Richard J.	116 Wolf Creek Drive, North
Barry J.	13 - 31st Street East
Carol	790 Southwest Kensington
Daniel J.	16193 Woodbine
Elizabeth H.	1507 Summit
Catherine Eadie	1300 Jackson School Road
Dionicio	108 Timber Trail
George	Rural Route 1, Box 120
Algelee P.	2604 Grant Lane
Alison R.	1010 Bell Avenue

14009

GOA

LAST PAGE of List "B"

Name	Address	City	Phone	Date	Amount	ID
Zimmer	Virginia M.	Chicago	1160626-	08/07/92	10.00	686
Zimmerman	Andrew	San Francisco	CA94114-	08/10/92	30.00	1138
Zimmerman	Ben	Lawrence	KS66046-	08/06/92	25.00	896
Zimmerman	Brian J.	Brooklyn	NY11201-	08/10/92	35.00	1618
Zimmerman	Emily Ann	Jacksonville	FL32217-	08/17/92	25.00	1079
Zimmerman	Joy A.	Boonsboro	MD21713-	08/12/92	10.00	4945
Zimmerman	Lenora	Skokie	IL60076-	08/10/92	15.00	5907
Zimmerman	Mary F.	Watsonville	VA95076-	08/17/92	10.00	657
Zimmerman	Richard L.	Poway	CA92064-	08/07/92	20.00	6190
Zimmerman	Robert A.	Colombus	OH43216-	08/12/92	10.00	1035
Zimmerman	Verena K.	Maitland	FL32751-	08/14/92	50.00	1604
Zimmerman	Walter J.	Hokomis	FL32751-	08/10/92	10.00	335
Zinberg	Arthur D.	New York	NY10009-	08/13/92	250.00	0080
Ziraldo	Leonard	West Hills	CA91304-	08/13/92	5.00	4753
Zirbel	Cliff W.	Manhattan Beach	CA90266-	08/10/92	20.00	543
Ziss	149 Cliffwood Lane	Falmouth	MA02540-	08/13/92	100.00	1628
Zito	Olga W.	Plantation	FL33322-	08/06/92	15.00	0111
Zivkovich	Lucille	Mt Kliffie	OH44092-	08/07/92	10.00	6272
Zlogar	Leurlee W.	River Falls	WI54022-	08/14/92	25.00	3853
Zobec	Josef	Ocala	FL34479-	08/14/92	50.00	6495
Zobot	Nolly	Oakland	CA94611-	08/10/92	25.00	490
Zoranovich	John C.	Lafayette	CA94549-	08/07/92	25.00	2082
Zoss	Betty Hurwich	Beverly Hills	CA90212-	08/13/92	100.00	4915
Zuchet	Joel	Vineyard Haven	MA02568-	08/11/92	10.00	327
Zuckerman	Gloria C.	North Leverett	MA01054-	08/18/92	25.00	0473
Zuckerman	Aaron	Pearisburg	VA24134-	08/12/92	25.00	2310
Zuckerman	George R.	Keasley	CA94703-	08/10/92	50.00	0685
Zuckerman	Hildegarde	Brightwater	NY11718-	08/19/92	100.00	1815
Zuckerman	Marilyn	New York	NY10023-	08/17/92	25.00	241
Zuckerman	Victor	Washington	DC20009-	08/11/92	50.00	1854
Zuckerman	Lawrence G.	Voorheesville	NY12186-	08/10/92	10.00	4985
Zuelke	Fred A.	Oradell	NJ07649-	08/13/92	25.00	1054
Zuhara	Talia	San Diego	CA92105-	08/07/92	10.00	3563
Zukowski	Francis W.	Vero Beach	KS67203-	08/07/92	30.00	3673
Zulandt	David F.	Zanesville	OH43701-	08/07/92	25.00	1233
Zupanic	Jenna C.	Youngstown	OH43701-	08/07/92	100.00	909
Zuri	Angelina	Queens Village	OH4502-	08/14/92	100.00	896
Zurofsky	Bennet D.	Hawplewood	NY11428-	08/06/92	46.00	1448
Zusman	Fred S.	Silver Spring	MD20901-	08/12/92	10.00	3223
Zutrum	Herman	San Francisco	CA94127-	08/10/92	50.00	3691
Zwerdling	Alice G.	Kensington	MD20895-	08/06/92	50.00	1999
Zwerling	David M.	Silver Spring	MD20910-	08/12/92	100.00	2218
Zwilyk	Ingrid	Wainut Creek	CA94595-	08/19/92	100.00	3860
Zwirn	Klaus H.	Rockville	MD20852-	08/13/92	50.00	3033
Zyskind	Mary E.	Leguna Hills	CA92653-	08/07/92	25.00	3036
Zytowski	Miriam	Shrewsbury	NJ07702-	08/12/92	50.00	1408
d'Hamoncourt	Suzanne M.	Los Alamitos	CA90720-	08/10/92	25.00	3162
deCelle	Sarah	Newtown Square	PA19073-	08/11/92	30.00	2346
	Angela S.	Fairfax	CA94930-	08/10/92	50.00	1890

14010

Pac's Reconciliation of List "3"

Page 1

99-04-393-1748

33	6401	<<	25	00	<>	920811	<>	MR.	Aaron, Conice E.
33	1813	<>	100	00	<>	920813	<>	Mrs.	Aaron, Geraldine
33	2605	<>	5	00	<>	920812	<>	Mrs.	Aaron, James G.
33	6248	<>	10	00	<>	920810	<>	Mrs.	Abara, Jephthah Anozie
33	9857	<>	50	00	<>	920817	<>	Mrs.	Abbarbanel, Elliot W.
33	8401	<>	20	00	<>	920817	<>	Mrs.	Abba, Charles G.
33	2431	<>	10	00	<>	920806	<>	Mrs.	Abel, Judith
33	2242	<>	5	00	<>	920810	<>	Mrs.	Abel, Judith
33	3366	<>	25	00	<>	920807	<>	Mrs.	Abel, Nancy L.
33	2669	<>	15	00	<>	920807	<>	Mrs.	Abell, Shannon G.
33	0694	<>	25	00	<>	920811	<>	Mrs.	Abell, W. R.
33	2386	<>	10	00	<>	920811	<>	Mrs.	Abelman, Deborah
33	6576	<>	20	00	<>	920817	<>	Mrs.	Abercrombie, Ann G.
33	8558	<>	25	00	<>	920810	<>	Mrs.	Abernathy, J. L.
33	2414	<>	30	00	<>	920810	<>	Mrs.	Abernathy, Byron R.
33	4337	<>	3	00	<>	920811	<>	Mrs.	Abes, Edith
33	2894	<>	10	00	<>	920814	<>	Mrs.	Abeshouse, David J.
33	3511	<>	25	00	<>	920811	<>	Mrs.	Abraham, Gerard
33	3505	<>	50	00	<>	920807	<>	Mrs.	Abraham, Harriet S.
33	5093	<>	25	00	<>	920806	<>	Mrs.	Abraham, Judith Anne
33	381	<>	10	00	<>	920814	<>	Mrs.	Abrams, Anne M.
33	4343	<>	10	00	<>	920814	<>	Mrs.	Abrams, Henrietta
33	358	<>	25	00	<>	920813	<>	Mrs.	Abrams, Jack
33	1745	<>	15	00	<>	920813	<>	Mrs.	Abrams, Jack B.
33	1578	<>	250	00	<>	920813	<>	Mrs.	Abrams, Mussetta L.
33	2877	<>	1	00	<>	920806	<>	Mrs.	Abrams, Robert H.
33	3535	<>	25	00	<>	920817	<>	Mrs.	Abrams, Sarah W.
33	3938	<>	25	00	<>	920817	<>	Mrs.	Abramson, Mark A.
33	469	<>	40	00	<>	920811	<>	Mrs.	Abramson, Robert S.
33	9901	<>	100	00	<>	920813	<>	Mrs.	Abt, Rudolph
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33	4125	<>	50	00	<>	920811	<>	Mrs.	Ackerman, Irene K.
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33	555	<>	30	00	<>	920811	<>	Mrs.	Adams, E. Dwight
33	2836	<>	30	00	<>	920811	<>	Mrs.	Adams, E. M.
33	1936	<>	25	00	<>	920812	<>	Mrs.	Adams, Elinore M.
33	412	<>	25	00	<>	920813	<>	Mrs.	Adams, Ella V.
33	1978	<>	10	00	<>	920813	<>	Mrs.	Adams, George F.
33	284	<>	10	00	<>	920813	<>	Mrs.	Adams, Gretchen G.
33	284	<>	10	00	<>	920813	<>	Mrs.	Adams, Helen E.
33	1978	<>	10	00	<>	920813	<>	Mrs.	Adams, Hilda P.
33	1978	<>	125	00	<>	920807	<>	Mrs.	Adams, Joy M.

14011



Poc's Reconciliation List "3"

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Break: 3
717,2259

POC's ~~MACA~~ OT
 RECONCILIATION "3"
 Page 3
 14-7

List 3 XFER 10-05-92

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Barnes, Rosie L.	259	25.00
Churchill, Arthur C.	516	10.00
King, Ida Lee	201	25.00

90.00

REFUNDS

Baker, James	5145	10.00
Bernholz, John P.	547	25.00
Block, Frances Grace	632	100.00
Carter, Warren R.	3278	30.00
Fowler, Beatrice G.	852	20.00
Goodis, Jesse	1778	10.00
Jordan, Mary R.	3179	100.00
Knapp, Cheryl David	473	50.00
McLead, Kenneth R.	3689	50.00
Shannon, John	1001	5.00
Tartakowski, Celia	1688	45.00
Vogel, Marian L.	572	40.00

485.00

ON OTHER LISTS

Transferred Back To Primary			
Hensel, Harriet H.	1653	25.00	
Kempinen, Judith	1268	10.00	
Perge, Steve	CC2060	20.00	
Potepan, Helen S.	741	10.00	
Robison, William T.	3423	50.00	
Aull, Charles M.	11512	50.00	Submitted
Lonsway, Thomas	6738	100.00	Submitted
Miller, Jerry R.	361	20.00	Submitted
Looper, Nancy	1059	50.00	Submitted

335.00

UNABLE TO IDENTIFY

Hanel, David G.	7429	10.00
Richey, Mildred L.	3788	5.00
Willy, Jon	1344	50.00

65.00

AMOUNT WITH PROBLEMS

975.00

AMOUNT ON POC COMPUTER

713225.55

TOTAL ACCOUNTED FOR

714200.55

XFER AMOUNT

715901.52

14013

UNACCOUNTED FOR DIFFERENCE

1700.97

FROM Little Rock 14-8
 PAGE OF "5"
 First Page

0697034	Lake Oswego	50.00	08/12/92	2383
H08106	Auburn	25.00	08/13/92	1546
HMS5420	Minneapolis	25.00	08/11/92	15387
A285253	Scottsdale	20.00	08/13/92	0055
HV89121	Las Vegas	50.00	08/14/92	2005
C080017	Aurora	40.00	08/12/92	612
VA22031	Fairfax	100.00	08/12/92	604
NY10019	New York	25.00	08/11/92	727
CAP1604	Studio City	100.00	08/13/92	2030
WA98103	Seattle	7.00	08/10/92	2159
FL33480	Palm Beach	50.00	08/11/92	1197
VT05602	Montpelier	50.00	08/18/92	0833
IL60660	Chicago	10.00	08/18/92	2310
PA16510	Erie	25.00	08/17/92	1046
NC28270	Charlotte	50.00	08/19/92	0783
MI49721	Cheboygan	48.00	08/12/92	2932
OR97337	Rogue River	50.00	08/16/92	4780
TX77346	Friendswood	25.00	08/12/92	6555
CA95616	Davis	30.00	08/11/92	526
HMS5408	Minneapolis	25.00	08/07/92	6830
CA92692	Mission Viejo	25.00	08/14/92	609
CA94705	Berkeley	300.00	08/11/92	1388
IA50322	Urbandale	25.00	08/18/92	4092
NY15580	Webster	15.00	08/10/92	791
WA98115	Seattle	30.00	08/11/92	1172
TX37076	Hemphill	100.00	08/06/92	3408
CA90401	Santa Monica	50.00	08/17/92	467
CA91104	Pasadena	20.00	08/18/92	4191
VI54403	La Crosse	15.00	08/13/92	0469
HMS7505	Santa Fe	50.00	08/14/92	2151
CA92083	Vista	10.00	08/13/92	4793
NY10025	New York	100.00	08/19/92	6797
IL60437	Chicago	100.00	08/18/92	7675
CA94109	San Francisco	30.00	08/10/92	3575
HI14850	Ithaca	50.00	08/17/92	2010
HI96740	Kailua-Kona	100.00	08/16/92	2231
DC20037	Washington	100.00	08/11/92	1470
IA50910	Ames	25.00	08/17/92	382
WA98188	Seattle	25.00	08/18/92	02771
NY10462	Bronx	10.00	08/01/92	241
MD20723	Laurel	25.00	08/14/92	1907
CA95456	Little River	35.00	08/01/92	1706
HMS0996	Yerworth	25.00	08/07/92	653
FL34236	Sarasota	30.00	08/12/92	0962
K566208	Prairie Village	50.00	08/18/92	993
VI34103	Armsstrong Creek	50.00	08/12/92	178
FL33980	Port Charlotte	20.00	08/10/92	428
WA98461	Vancouver	25.00	08/07/92	4160
TX78746	Austin	50.00	08/17/92	353
OR97330	Cervellia	25.00	08/16/92	5452
HMS3345	Minnetonka	100.00	08/16/92	0788
K566408	Prairie Village	50.00	08/16/92	4004
CT06511	New Haven	30.00	08/13/92	1262
FL33466	Delray Beach	30.00	08/06/92	561
CA94025	Menlo Park	30.00	08/17/92	0632
CA91403	Sherman Oaks	100.00	08/13/92	179
IL60457	Chicago	50.00	08/07/92	0513
CA92076	Poway	250.00	08/11/92	1579
CA92264	Palm Springs	5.00	08/16/92	8192
NY10017	New York	20.00	08/13/92	1118
8057532	Ft. Pierre	250.00	08/06/92	0498
NY10023	New York	50.00	08/16/92	682
CA94706	Albany	50.00	08/11/92	7980
WA98103	Seattle	50.00	08/16/92	5576
NC28756	Mill Spring	100.00	08/19/92	2296
NY11225	Brooklyn			

\$ Transferred \$174,172.92 on 10-15-92
 ("5" + "2")

5015 Foothills Road	Number B	5015 Foothills Road	Apartment 510-S
254 Wyoming Avenue		254 Wyoming Avenue	
8245 11th Avenue South		8245 11th Avenue South	
5917 North 83rd Street		5917 North 83rd Street	
4243 White Sands Avenue		4243 White Sands Avenue	
1181-E South Zeno Way		1181-E South Zeno Way	
2869 Glenvale Drive		2869 Glenvale Drive	
450 West 55th Street, #5RE		450 West 55th Street, #5RE	
4325 Vantage Avenue		4325 Vantage Avenue	
5625 12th Avenue, N.E.		5625 12th Avenue, N.E.	
3250 South Ocean Boulevard		3250 South Ocean Boulevard	
60 1/2 College Street		60 1/2 College Street	
5816 North Kenmore		5816 North Kenmore	
2103 Hannon Road		2103 Hannon Road	
900 Wishing Well Lane		900 Wishing Well Lane	
1191 Needle Point Drive		1191 Needle Point Drive	
1630 Sykes Circle Road		1630 Sykes Circle Road	
5241 Whittier Oaks Drive		5241 Whittier Oaks Drive	
748 Elmwood Drive		748 Elmwood Drive	
2614 Pleasant Avenue South		2614 Pleasant Avenue South	
28242 Yanez		28242 Yanez	
2717 Alcatraz Avenue		2717 Alcatraz Avenue	
7506 Prairie Avenue		7506 Prairie Avenue	
1187 Scandia Drive		1187 Scandia Drive	
7300 49th Avenue, Northeast		7300 49th Avenue, Northeast	
301 Bonnahurst Drive	Number 230	301 Bonnahurst Drive	Number 230
1551 Ocean Avenue		1551 Ocean Avenue	
1141 North Wilson	Apartment 200	1141 North Wilson	Apartment 200
403 Gillette Street		403 Gillette Street	
2409 Calle Bella		2409 Calle Bella	
225 Via Tore		225 Via Tore	
66 West 94th Street, #21A		66 West 94th Street, #21A	
5515 South Woodlawn Avenue	Number 102	5515 South Woodlawn Avenue	Number 102
2095 California Street		2095 California Street	
1416 Hanshaw Road		1416 Hanshaw Road	
78-7233 Puupele Road		78-7233 Puupele Road	
700 New Hampshire Avenue, North		700 New Hampshire Avenue, North	
1110 Roosevelt Avenue	Number 307	1110 Roosevelt Avenue	Number 307
3235 South 152nd Street		3235 South 152nd Street	
2144 Bronx Park East		2144 Bronx Park East	
9613 Tester Court		9613 Tester Court	
33200 Frog Pond Road	Post Office Box 363	33200 Frog Pond Road	Post Office Box 363
119 Portland Street		119 Portland Street	
7836 Tomhawk	Number 1908	7836 Tomhawk	Number 1908
16339 Sugar Bush Drive		16339 Sugar Bush Drive	
2543 Achilles Street		2543 Achilles Street	
6912 Kansas Street		6912 Kansas Street	
3107 Eaneswood Drive		3107 Eaneswood Drive	
4210 N. W. Crescent Valley Dr		4210 N. W. Crescent Valley Dr	
5630 Mahoney Avenue		5630 Mahoney Avenue	
2908 West 71st Street		2908 West 71st Street	
485 George Street	Apartment 4	485 George Street	Apartment 4
Seville C 63		Seville C 63	
507 Durham Street		507 Durham Street	
3815 Woodcliff Road		3815 Woodcliff Road	
2960 North Lake Shore Drive		2960 North Lake Shore Drive	
P. O. Box 1293		P. O. Box 1293	
1655 Ridgmore Drive		1655 Ridgmore Drive	
321 East 45th Street		321 East 45th Street	
P.O. Box 568		P.O. Box 568	
30 West 63rd Street	Number 8M	30 West 63rd Street	Number 8M
613 Cornell Avenue		613 Cornell Avenue	
3727 Eastern Avenue, North		3727 Eastern Avenue, North	
362 Silver Creek Road		362 Silver Creek Road	
17 Chester Court		17 Chester Court	
Marfanne		Marfanne	
Mary C.		Mary C.	
E. Elmer		E. Elmer	
Norman S.		Norman S.	
Rollin		Rollin	
Caroline N. V.		Caroline N. V.	
Kerry L.		Kerry L.	
Patricia Bryan		Patricia Bryan	
Penny		Penny	
Joe E.		Joe E.	
Julie		Julie	
Aaron Dov		Aaron Dov	
Marcelle		Marcelle	
Margaret		Margaret	
Robert R.		Robert R.	
Clarence B.		Clarence B.	
Kenneth D.		Kenneth D.	
Margaret B.		Margaret B.	
Michael D.		Michael D.	
Bess		Bess	
Ken		Ken	
C. J.		C. J.	
Charles H.		Charles H.	
Irving A.		Irving A.	
Judy A.		Judy A.	
Ronald A.		Ronald A.	
Lambert W.		Lambert W.	
Joan		Joan	
Dorothy B.		Dorothy B.	
Ellen P.		Ellen P.	
Robert J.		Robert J.	
Drusilla A.		Drusilla A.	
Mary Jane		Mary Jane	
Richard W.		Richard W.	
Marjorie E.		Marjorie E.	
Ruth B.		Ruth B.	
Jack		Jack	
Richard		Richard	
Miriam		Miriam	
Pamoda D.		Pamoda D.	
Carol		Carol	
Claudia B.		Claudia B.	
Dorothy May		Dorothy May	
Gloria W.		Gloria W.	
Helen H.		Helen H.	
Ida J.		Ida J.	
Jeffrey W.		Jeffrey W.	
Jo Ann		Jo Ann	
Karen P.		Karen P.	
Hartha A.		Hartha A.	
Sherman A.		Sherman A.	
Frieda		Frieda	
Penny		Penny	
Maryann K.		Maryann K.	
Dotty		Dotty	
David B.		David B.	
Dona		Dona	
Martha R.		Martha R.	
Violet		Violet	
H. Scott		H. Scott	
John		John	
Signe G.		Signe G.	
Judy P.		Judy P.	
John		John	

14014
 GOA

1st Page of List "5" From Little Rec

Wolters	Margaret L.	1000 - 73rd Street	1000	08/14/92	487
Wolfman-Leavy	Miriam E.	4250 West Church Street	10.00	08/18/92	59.
Wolfson	Andrew	31 Strong Place	25.00	08/13/92	330
Wolman	Evan	183 Berkeley Place	50.00	08/10/92	976
Wood	Ted	Post Office Box 229	25.00	08/13/92	2238
Wood	Dee	1025 Althea Lane	50.00	08/13/92	2155
Wood	Elaine L.	506 Copley Drive	10.00	08/10/92	2953
Wood	Fern R.	809 West Main Street	25.00	08/07/92	0706
Wood	Maxine W.	120 Wythe Parkway	50.00	08/13/92	370
Wood	Robert H.	41 Prospect Avenue	50.00	08/11/92	2101
Woodall	L. J.	P. O. Box 151395	50.00	08/06/92	2550
Woodland	Joan	1078 Neptune Avenue	50.00	08/17/92	1663
Woods	John W.	7013 Ramsgate Place	30.00	08/10/92	1669
Woods	Stewart A.	633 36th Avenue, N. E.	50.00	08/13/92	4876
Woodson	Matalie W.	10964 Swansfield Road	25.00	08/18/92	3139
Woolfork	Dorothy	3921 Third Avenue, South	100.00	08/14/92	4588
Worcester	Bruce A.	2151 Caminito Circulo Norte	200.00	08/12/92	3460
Wormser	Matthew B.	24 High Street	30.00	08/12/92	223
Wortis	Avi	15 Sheldon Street	200.00	08/18/92	3856
Wright	Cleo Ann	965 South 11 1/2 Avenue	25.00	08/07/92	0345
Wright	Fern F.	1895 West Devonshire	10.00	08/11/92	2411
Wright	Steven	P. O. Box 901	50.00	08/14/92	1999
Wynn	Eugene M.	1803 Old Montgomery Road	100.00	08/18/92	6507
Wynne	L. Wilson	Post Office Box 726	50.00	08/13/92	3209
Yabuzaki	Harry	100 Oakmont Lane	5.00	08/14/92	6459
Yagmur	Marie Pack	23217 Cuervo Drive	25.00	08/17/92	3643
Yanaush	Jack L.	110 Montrose Avenue	10.00	08/14/92	1610
Yasick	Stephen J.	112572 Silver Creek Road	10.00	08/12/92	2204
Yates	Jerald F.	2304 Pine Drive	50.00	08/14/92	1193
Yellen	Manuel	1444 San Remo Drive	50.00	08/13/92	6935
Yokum	Alice B.	Millerton Road	250.00	08/13/92	7586
Yoshimura	Michiko	2911 Armstrong Road	100.00	08/06/92	6055
Yost	Luther L.	683 Paddle Wheel Court West	100.00	08/13/92	796
Young	James R.	101 South St. James Boulevard	50.00	08/10/92	7815
Young	Lois F.	3100 Crescent Rim Drive	50.00	08/13/92	3087
Young	Patricia K.	15519 Mason Circle	100.00	08/13/92	1875
Young	Robert L.	1230 W. Sedgewick Drive	10.00	08/13/92	3380
Young	Virginia D.	18 Campbell Street	50.00	08/17/92	5778
Young	William T.	1 Hampton Street.	25.00	08/13/92	499
Youngblood	W. P.	7 Hegeman Road	30.00	08/13/92	252
Younts	Jane A.	Route 1 Box 750	100.00	08/17/92	4966
Zafman	Norman	214 South Le Doux Road	25.00	08/17/92	1494
Zamore	Peter H.	R.F.D. 1, Box 330	100.00	08/18/92	1664
Zankman	Harry I.	20 State Road	10.00	08/12/92	1664
Zapfen	Marshall H.	717 North Agnes	25.00	08/19/92	0371
Zerkin	Leif	379 Flat Creek Church Road	10.00	08/16/92	394
Ziegler	Doris D.	6305 South Two Mile Road	10.00	08/16/92	2840
Zimmerman	Mary Sue	2601 West 52nd Avenue	100.00	08/17/92	3266
Zimmer	Barbara	3361 Maverly Street	100.00	08/17/92	1003
Zimmering	Stanley	12 Chapin Road	50.00	08/06/92	1003
Zimmerman	Henry I.	52 Kilsyth Road	10.00	08/17/92	3094
Zokai	Patricia McNulty	6516 Scott Lane	10.00	08/06/92	4009
Zolkln	Margaret E.	125 Waterford F	10.00	08/14/92	1628
Zucker	Max	14 Willowbrook Lane	5.00	08/10/92	618
Zvonar	Lorraine H.	1119 61st Street, South	30.00	08/12/92	1918

14015

05 04 1 2 5

12

Poc's Reconciliation List "5"

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Poc's Reconciliation

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POC's Reconciliation

List "2"

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14022

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ack: Z

List 5 XFER 10-15-92

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Kingsbury, Mary Anne

List Z XFER 10-15-92

NSF

Alrich, Diana

AMOUNT WITH PROBLEMS

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AMOUNT ON POC COMPUTER

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TOTAL ACCOUNTED FOR

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XFER AMOUNT

194172.98

UNACCOUNTED FOR DIFFERENCE

36.56

POC'S RECAP 01
RECONCILIATION Page 14:13
Lists "S" + "Z"

69 "04" 393 "1760

14023

1st Page List "6" From Little Rock

14-15

TRANSFERS

12

10/24

Name	Address	City	State	Zip	Phone	Account No.	Balance	Date
Jane H. Abel	1630 Broadmoor Drive East	Seattle	WA	98112		250.00	08/11/92	
Martha Abell	10863 Loro Verde Avenue	Loma Linda	CA	92354		10.00	08/12/92	0175
Adelle A. Abrahamen	181 Coventry Road	Decatur	GA	30030		25.00	08/06/92	2983
John Abrahamsen	3105 Rummymede Road	Louisville	KY	40222		30.00	08/13/92	4275
Acevedo C. H.	261 Mumich Street	San Francisco	CA	94112		10.00	08/06/92	2359
Adams Nancy	238 Elliot Street	Chestnut Hill	MA	02167		750.00	08/06/92	10469
Adams Robert G.	510 West 112th Street	New York	NY	10025		50.00	08/06/92	1332
Adams Stewart L.	3411 60th Street	Moline	IL	61265		100.00	08/12/92	1002
Adams Avis E.	1150 Janes Road	Medford	OR	97501		25.00	08/17/92	3755
Adelman Abraham	1232-A Club Drive West	Delray Beach	FL	33445		25.00	08/11/92	492
Alexander Susan	924 Elmwood Avenue	Wilmette	IL	60091		100.00	08/17/92	5841
Allen Beulah	3302 Adelaide Way	Belmont	CA	94002		50.00	08/17/92	347
Allen Phillip R.	2309 Kenilworth Avenue	Los Angeles	CA	90039		25.00	08/13/92	1165
Alperin Stanley	7610 Aldrich Circle	Brooklyn Park	MN	55444		20.00	08/14/92	7291
Alpert Debra E.	5807 West 77th Place	Los Angeles	CA	90045		100.00	08/11/92	856
Altman Peter A.	5920 Main Street	New Port Richey	FL	34652		25.00	08/10/92	790
Altman Stephen E.	70 Remsen Street	Brooklyn Heights	NY	11201		18.00	08/12/92	553
Alviar Guedalupe	2065 Riegler Road	Muskegon	MI	49444		25.00	08/12/92	2997
Amber Sylvia	18999 Capitol Drive	Southfield	MI	48075		25.00	08/17/92	2441
Anderson David E.	747 Portwalk Place	Redwood City	CA	94065		30.00	08/12/92	2480
Anderson Hilda L.	8819 South Clairborne Avenue	New Orleans	LA	70118		100.00	08/10/92	882
Anderson James D.	P. O. Box 38	New Brunswick	NJ	08903		100.00	08/13/92	540
Anderson Sonja	14208 Chring Cross Road	Eden Prairie	MN	55346		50.00	08/06/92	15985
Andrews Bruce R.	252 South College Street	Port Townsend	WA	98368		40.00	08/16/92	4026
Anstey Helen G.	1051 Hancock Street	Brooklyn	NY	11226		40.00	08/10/92	CC7015
Antoine Arille	2904 Beverly Road	Redford	MI	48239		15.00	08/10/92	2184
Antosz Frank J.	14253 Seminole Street	Spokane	WA	99201		50.00	08/17/92	1781
Apley Tim B.	West 1923 Mallon	Shelburne Falls	OH	43075		100.00	08/14/92	113
Appley Dee G.	270 South Shelburne Road	At-Lington	VA	22205		30.00	08/07/92	4007
Arden Caroline	5999 North 9th Street	Sople	IA	50386		50.00	08/11/92	5671
Arndt Catherine S.	3960 Hermann Lake Road	Walden	NY	12586		15.00	08/10/92	4034
Aronson Marsha L.	91 Coldenham Road	West Gray	ME	04071		30.00	08/13/92	438
Arsenault Wilma B.	Little Sebago Lake	Newton Center	MA	02159		30.00	08/11/92	2861
Arton Gertrud C.	John W. Weeks House, #202	Hungry Horse	MT	59919		10.00	08/17/92	2784
Ash Gordon W.	P.O. Box 19004	Saint Louis	MO	63130		25.00	08/17/92	2078
Ashford Willie Belle	6490 Enright	Colton	CA	92324		20.00	08/14/92	4698
Asperas Juan P.	1351 North Driftwood Avenue	Honolulu	HI	96825		100.00	08/13/92	2492
Au Robyn U.	900 Kahena Street	Jackson Heights	NC	28607		25.00	08/07/92	757
Auerbach Adam	34-31 75th Street	Boone	OR	97405		150.00	08/11/92	1130
Austin Roberts J.	Route 3, Box 933	Eugene	FL	34285		25.00	08/10/92	4407
Avery Gilbert S.	1175 Fir Lane	Venice	NY	10463		25.00	08/12/92	867
Babcock Hannah C.	809 Stymlie Place	Worcester	MA	01602		20.00	08/13/92	0872
Bader Louis	530 West 256th Street	Hiami	FL	33175		25.00	08/17/92	3012
Baker Frederic	22 June Street	California	MO	20619		25.00	08/12/92	1192
Baldwin John G.	13009 S. W. 42nd Terrace	Brooklyn Park	MN	55443		100.00	08/14/92	3253
Ball Nancy	611 Willow Oak	Los Angeles	CA	90016		15.00	08/06/92	6153
Ballow Jean C.	9036 Glen Edin Lane	Brooklyn	NY	11224		25.00	08/11/92	6044
Balez Paula J.	4934 West Martin Luther King	Santa Fe	NM	87505		250.00	08/12/92	0882
Banks Maureen S.	4739-G La Villa Marina	Santa Ana	CA	92701		10.00	08/14/92	713
Barchat Arnette J.	2930 West 5th Street	Belton	TX	76513		10.00	08/07/92	5009
Barclay Rutgers	Rural Route 9 Box 66	Fort Lauderdale	FL	33312		20.00	08/07/92	9006
Bard David S.	600 West 3rd Street	Madison	WI	53713		100.00	08/17/92	5489
Barnes J. C.	2010 North East Street	Ward	SD	57074		20.00	08/12/92	778
Barnett Beatrice H.	3680 S.W. 15th Court	Western Springs	IL	60558		250.00	08/13/92	CC4124
Barnett Martin A.	2685 Marshall Parkway	Lakeside	MT	59922		50.00	08/18/92	2140
Barron Meredith G.	Route 1, Box 24	Los Angeles	CA	90004		50.00	08/19/92	1138
Barsenti Richard H.	5305 Woodland Avenue	Santa Cruz	CA	95062		25.00	08/10/92	1022
Barthelmeas Jane J.	Post Office Box 75	Long Beach	CA	90814		50.00	08/14/92	2051
Bartu Peter J.	156 North Mariposa Avenue	Buffalo	NY	14222		50.00	08/06/92	2735
Basham Pearl L.	1555 Herrilott	Rogersville	AL	35652		50.00	08/10/92	480
Bassi David	2132 Bermuda Street	Laguna Niguel	CA	92677		50.00	08/10/92	929
Bateman Derek	457 Richmond Avenue	Allenspark	CO	80510		10.00	08/07/92	2817
Bates Fannie L.	P.O. Box 598							
Bath Larry W.	3 Tacknor Place							
Beal George H.	Cabin Creek Road							

\$ transferred 10-27-92 \$62,118.00

Number 48
Apartment 1 D

Apartment 109

Apartment 311

Apartment A-113

Space 86
Number 201

14024

GOA

LAST PAGE of List "6"

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 20.00 08/13/92 2198
 25.00 08/11/92 0531
 25.00 08/10/92 1165
 100.00 08/06/92 3489
 100.00 08/17/92 2863

FL33066-
 MA01510-
 IL60202-
 FL34623-
 NJ07076-
 MI48323-
 MO64114-
 MN56058-

Coconut Creek
 Clinton
 Evanston
 Clearwater
 Scotch Plains
 West Bloomfield
 Kansas City
 Le Sueur

1602 Abeco Drive, C-4
 37 Lane Avenue
 828 Oakton Street
 2452 Laurelwood Drive
 33 Burnham
 2093 Burgundy
 20 East 115th Terrace
 630 Ferry Street

Leonor P.
 Saul
 David
 Yolan
 Alan
 Raymond
 Richard P.
 Phyllis A. Kuehl

Yudoj
 Zapantis
 Zarefaky
 Ziesman
 Zimmerman
 Zolnowski
 Zumach

14025

Contemporaneous

comment by

POC staff -

referring to

"theirs" figure.

meaning

HQ in Little Rock



Balanced

b

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1/12/15
62,118.00

62,118.00

Break: 6

POC's Reconciliation List "6"

LAST PAGE

14028

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30485	<>6<>336	<>097<>29<>FDK<>G<>Wheatbread, Ermine H.	<>Mrs.
29698	<>6<>4581	<>016<>27<>FDK<>G<>Wheeler, Janice A.	<>Mrs.
26422	<>6<>740	<>107<>34<>FDK<>G<>Whitaker, Helen M.	<>Mrs.
28976	<>6<>5732	<>062<>33<>FDK<>G<>White, Charles V.	<>Mr.
30287	<>6<>5822	<>005<>30<>FDK<>G<>White, Eunice O.	<>Ms.
28955	<>6<>5852	<>057<>35<>FDK<>G<>White, Gail	<>Ms.
28151	<>6<>241	<>053<>14<>FDK<>G<>White, Janis G.	<>Ms.
11385	<>6<>433	<>067<>27<>FDK<>G<>White, Samuel J.	<>Mr.
20735	<>6<>2337	<>009<>03<>FDK<>G<>White, Ruth O.	<>Ms.
27909	<>6<>1607	<>074<>22<>FDK<>G<>Whitenack, William K.	<>Mr.
2041	<>6<>169	<>014<>29<>FDK<>G<>Whiting, Robert B.	<>Mr.
6158	<>6<>1307	<>060<>33<>FDK<>G<>Whitten, Roy V.	<>Mr.
624	<>6<>2116	<>095<>36<>FDK<>G<>Wicklund, Oliver E.	<>Mr.
26573	<>6<>1891	<>027<>35<>FDK<>G<>Widlar, Katherine H.	<>Ms.
20735	<>6<>5838	<>115<>35<>FDK<>G<>Wieder, Dora C.	<>Mrs.
20135	<>6<>50ASH	<>009<>02<>FDK<>G<>Wikstrom, Jr. Gunnar	<>Dr.
14604	<>6<>2271	<>101<>00<>FDK<>G<>Willey, McDonald	<>Mr.
21772	<>6<>4503	<>131<>35<>FDK<>G<>Wilkinson, Marie	<>Mrs.
5739	<>6<>449	<>051<>14<>DRS<>G<>Willey, Susan J.	<>Ms.
30389	<>6<>5C7383	<>149<>25<>FDK<>G<>Williams, Eileen C.	<>Ms.
3889	<>6<>2882	<>014<>18<>FDK<>G<>Williams, J.	<>Mr.
6898	<>6<>3958	<>020<>28<>FDK<>G<>Williams, Jeanne	<>Ms.
27609	<>6<>3763	<>074<>34<>FDK<>G<>Williams, Paul H.	<>Mr.
23011	<>6<>1787	<>011<>35<>FDK<>G<>Williams, Vivian Lewie	<>Mrs.
10739	<>6<>527	<>013<>25<>FDK<>G<>Williamson, Cornelia V.	<>Mrs.
10291	<>6<>3915	<>010<>29<>FDK<>G<>Williamson, Cornelia V.	<>Mrs.
29457	<>6<>5060	<>046<>32<>FDK<>G<>Wilson, Amy A.	<>Ms.
29417	<>6<>1847	<>082<>34<>FDK<>G<>Wilson, John H.	<>Mr.
25833	<>6<>296	<>098<>39<>FDK<>G<>Wilson, Robert R.	<>Mr.
14112	<>6<>3209	<>018<>33<>OMS<>G<>Winters, Maria J.	<>Ms.
18800	<>6<>2137	<>005<>34<>OMS<>G<>Wiseman, Elsie K.	<>Ms.
29222	<>6<>2512	<>038<>38<>FDK<>G<>Witten, William Lyons	<>Mr.
19856	<>6<>299	<>116<>30<>FDK<>G<>Wolchok, Charlotte	<>Ms.
21953	<>6<>1284	<>014<>35<>FDK<>G<>Wolfe, Constance	<>Dr.
41278	<>6<>2121	<>097<>25<>FDK<>G<>Wolfe, V. Eugene	<>Ms.
520688	<>6<>4233	<>097<>21<>FDK<>G<>Wolff, Warren	<>Mr.
28311	<>6<>464	<>080<>35<>FDK<>G<>Wood, Mirlan M.	<>Ms.
19558	<>6<>1875	<>064<>36<>FDK<>G<>Wood, Paul D.	<>Mr.
42039	<>6<>3360	<>030<>34<>FDK<>G<>Woodhead, Hope	<>Mrs.
52931	<>6<>4340	<>055<>34<>FDK<>G<>Woolcott, Patricia G.	<>Mrs.
23944	<>6<>1107	<>008<>03<>FDK<>G<>Worhatch, S. David	<>Mr.
123945	<>6<>2106	<>036<>19<>FDK<>G<>Wright, James T.	<>Mr.
230422	<>6<>1025	<>114<>36<>FDK<>G<>Wyatt, Russell	<>Ms.
528839	<>6<>2857	<>107<>34<>KR<>G<>Yarborough, Ralph W.	<>Mr.
30007	<>6<>2198	<>090<>19<>FDK<>G<>Yauman, F. E.	<>Ms.
519614	<>6<>50531	<>074<>35<>FDK<>G<>Young, Harold K.	<>Mr.
515174	<>6<>1165	<>125<>33<>FDK<>G<>Young, Harold K.	<>Ms.
510233	<>6<>2489	<>051<>35<>FDK<>G<>Yudof, Eleanor P.	<>Mrs.
281150	<>6<>2863	<>090<>20<>OMS<>G<>Zapantis, Iena H.	<>Mrs.
		<>124<>36<>FDK<>G<>Zapantis, David	<>Mr.
		<>085<>38<>FDK<>G<>Zimmerman, Alan	<>Mrs.
		<>010<>36<>FDK<>G<>Zimmerman, Raymond	<>Mr.
		<>062<>36<>FDK<>G<>Zolnowski, Richard P.	<>Mr.
		<>025<>31<>FDK<>G<>Zumach, Phyllis A. Kuehl	<>Mrs.

Break: 6 62,118.00

0 ● ● 7 14-18

CVI
11/5

NAME	ADDRESS	CITY	STATE	ZIP	AMOUNT	DATE	ACCOUNT NO.
Albert Alexander	Box 816	Little Rock	AR	72201	500.00	08/10/92	OK74502-
Athy	8777 Sykes Canyon Road	Little Rock	AR	72201	1000.00	08/12/92	MS59715-
Baird	1310 Nineteenth Street N. W.	Washington	DC	20036	1000.00	08/17/92	DC20036-
Bardsley	17 Tudor Place	Buffalo	NY	14222	500.00	08/06/92	NY14222-
BarKan	2820 Union Street	San Francisco	CA	94123	500.00	08/12/92	CA94123-
Blackmon	99 Village Road	Marhasset	NY	11030	500.00	08/12/92	NY11030-
Bond	32 Edgemoor	Little Rock	AR	72207	1000.00	08/10/92	AR72207-
Briken	201 West Evergreen Avenue	Philadelphia	PA	19118	500.00	08/06/92	PA19118-
Bullitt	450 Sixth Street S. E.	New York	NY	10011	1000.00	08/10/92	NY10011-
Cooper	1001 Fourth Avenue Plaza	Seattle	WA	98154	1000.00	08/14/92	WA98154-
Crane	Post Office Box 25	Warren	AR	71671	500.00	08/06/92	AR71671-
Crane	4620 Chico May Northwest	Bremerton	WA	98312	500.00	08/06/92	WA98312-
Crane	4620 Chico May Northwest	Bremerton	WA	98312	500.00	08/06/92	WA98312-
Duncan N.	95 Farm Street	Dover	MA	02030	1000.00	08/11/92	MA02030-
Dunlop	10 Park Avenue	New York	NY	10016	500.00	08/11/92	NY10016-
Ellis	1 Lakewood Lane	Vicksburg	MS	39180	1000.00	08/12/92	MS39180-
Erlanger	140 South Stratford Drive	Athens	GA	30605	1000.00	08/06/92	GA30605-
Fainberg	300 Via Lido Nord	Newport Beach	CA	92663	1000.00	08/11/92	CA92663-
Fairberg	Post Office Box 4023	Saint Thomas	VI	00003	500.00	08/13/92	VI00003-
Fewerzeig	2008 R. Street, N.W.	Washington	DC	20009	1000.00	08/11/92	DC20009-
Fleming	609 Epickson	Bainbridge Island	WA	98110	500.00	08/06/92	WA98110-
Fredricks	2637 Larkin Street	San Francisco	CA	94109	1000.00	08/06/92	CA94109-
Friedman	1712 Chevy Chase Drive	Beverly Hills	CA	90210	500.00	08/06/92	CA90210-
Garber	408 4th Avenue	Coon Rapids	IA	50058	500.00	08/06/92	IA50058-
Garst	172 Harold Avenue	Santa Clara	CA	95050	500.00	08/10/92	CA95050-
Gillmor	341 West Dudley Avenue	Westfield	MA	01090	500.00	08/10/92	MA01090-
Gould	7004 Kingsbury	St. Louis	MO	63130	1000.00	08/11/92	MO63130-
Grady	104 Larch Road	Cambridge	MA	02138	500.00	08/12/92	MA02138-
Hammerstein	100 Prince Street	New York	NY	10012	500.00	08/06/92	NY10012-
Hammond	3212 Newark Street, N.W.	Washington	DC	20008	500.00	08/11/92	DC20008-
Kamovit	775 Long Boat Club Road	Washington	DC	20016	1000.00	08/12/92	DC20016-
Kartrader	1320 Shepherd Street	Belmont	MA	02178	500.00	08/07/92	MA02178-
Kennessey	Four Webster Terrace	Little Rock	AR	72207	1000.00	08/13/92	AR72207-
Hodge	3442 44th Avenue, Southwest	Los Angeles	CA	90077	500.00	08/12/92	CA90077-
Ignatius	3650 Fordham Road, NJ	West Palm Beach	FL	33401	1000.00	08/11/92	FL33401-
Ives	3025 Newark Street, N. W.	Encino	CA	91316	500.00	08/06/92	CA91316-
Jackson	6 Hillside Terrace	Encino	CA	91316	500.00	08/12/92	CA91316-
Janis	5819 Kavanagh	El Cerrito	CA	94530	500.00	08/10/92	CA94530-
Janis	10870 Vicenza Way	Pittsboro	NC	27312	500.00	08/13/92	NC27312-
Kaplan	1801 South Flagler Drive	Bellingham	WA	98225	500.00	08/06/92	WA98225-
Kay	18134 Chardon Circle	New York	NY	10021	500.00	08/10/92	NY10021-
Kay	18134 Chardon Circle	Berkeley	CA	94708	500.00	08/11/92	CA94708-
Kerr	8300 Buckingham Drive	Chapel Hill	NC	27514	1000.00	08/14/92	NC27514-
Leight	Rt. 3 Box 218	Cambridge	MA	02138	1000.00	08/11/92	MA02138-
Limville	2737 Eldridge	Tracy	CA	95393	500.00	08/06/92	CA95393-
Lipton	550 Park Avenue	Indianapolis	IN	46226	500.00	08/06/92	IN46226-
Lubman	1422 Arch Street	Columbia	MO	65203	1000.00	08/07/92	MO65203-
MacDonald	750 Weaver Dairy Road	Leaington	MA	02173	500.00	08/12/92	MA02173-
MacHohl	45 Brewster Street	Los Angeles	CA	90009	500.00	08/17/92	CA90009-
Miles	P.O. Box 273	Atlanta	GA	30345	1000.00	08/11/92	GA30345-
Miller	6023 East 52nd Place	Seattle	WA	98101	1000.00	08/07/92	WA98101-
Mills	210 Business Park Boulevard	Bremford	CT	06840	500.00	08/10/92	CT06840-
Mollo-Christensen	10 Barbary Road	Kameoha	HI	96744	1000.00	08/06/92	HI96744-
Mungle	851 North Kings Road	Washington	DC	20007	500.00	08/06/92	DC20007-
Oakley	2224 Kodlak Drive Northeast	East Alton	IL	60224	1000.00	08/06/92	IL60224-
Palman	2702 Moonlight Road	Pittsburgh	PA	15232	500.00	08/07/92	PA15232-
Payne	110 1st Avenue	Glen Dale	CA	91206	1000.00	08/12/92	CA91206-
Pell	26 Springs Road	Hingham	MA	02043	500.00	08/11/92	MA02043-
Perry	47-507 Lulani Street	Saint Louis	MO	63124	1000.00	08/10/92	MO63124-
Pingree	6636 Garfield Street, Northwus						
Pratt	Post Office Box 179						
Raizman	5736 West Woodland Road						
Ross	430 Coutin Lane						
Ryan	175 Otis Street						
Schoedinger	6 Babler Lane						

FROM Little Rock

\$ transferred 11-5-92 \$81,683.00 = "7" + "u" + "x"

14020

GOA

44-38861-3767

(2) "7"

HJ08510-	500.00	08/13/92	3956
NY10128-	500.00	08/11/92	1916
CA9A120-	500.00	08/14/92	1365
MT59052-	500.00	08/06/92	711
VA98040-	500.00	08/06/92	2183
CA91711-	500.00	08/07/92	200
RI48070-	500.00	08/07/92	166
DC20015-	500.00	08/11/92	1913
MA02167-	1000.00	08/10/92	2870
IA50312-	500.00	08/18/92	1522
CA92103-	500.00	08/07/92	1154
VA23302-	1000.00	08/11/92	545
MA01338-	500.00	08/11/92	747
NY10128-	1000.00	08/13/92	7372
NY10024-	500.00	08/07/92	5249

Princeton	Apartment 11B
New York	Post Office Box 7595
San Francisco	
McLeod	
Mercer Island	
Claremont	
Huntington Woods	
Washington	
Chestnut Hill	
Des Moines	
San Diego	
Alexandria	
Buckland	
New York	
New York	

12 Ober Road	
1060 5th Avenue	
1070 Green Street	
4626 Forest Avenue, Southeast	
414 Yale Street	
1047 Lincoln	
3901 Harrison Street, Northwest	
104 Ferwood Road	
214 Foster Drive	
1637 Sutter Street	
804 Beverly Drive	
Charlemont Road	
1220 Park Avenue	
7 West 81st Street	

Schwarzschild	Barbara
Simons	Marilyn H.
Sinton	Robert E.
Smith	Farwell
Spitzer	Robert
Stafford	Robert A.
Stark	Sheldon J.
Summers	Victoria P.
Tofias	Arnold B.
Urban	Timothy J.
Vasic	Gojko
Wayne	Charles B.
Willmore	Dena G.
Worth	Robert R.
Zirin	Jane E.

ASD

14000

POC's Reconciliation

List "7"

Page one of two

Account Number	Amount	Name	Address
26588	500.00	<>F0K<>G<>Albert, Carl B.	<>The Honorable
1292396	1000.00	<>GEM<>G<>Alexander, Jr.	<>Mr.
1261333	1000.00	<>F0K<>G<>Athy, Jr.	<>Mr.
1261333	500.00	<>F0K<>G<>Baird, Brent D.	<>Mrs.
521493	500.00	<>F0K<>G<>Barksley, Elda S.	<>Mrs.
521506	500.00	<>F0K<>G<>Barkan, Francine G.	<>Mrs.
0159666	1000.00	<>F0K<>G<>Blackmon, Brunhilde K.	<>Mrs.
2269952	500.00	<>F0K<>G<>Bond, Mary F. W.	<>Mrs.
0192270	1000.00	<>F0K<>G<>Bullitt, Stimson	<>Mrs.
0281118	500.00	<>F0K<>G<>Cooper, Geraldine W.	<>Mrs.
116120	500.00	<>F0K<>G<>Crane, Paula T.	<>Mrs.
519512	1000.00	<>F0K<>G<>Crane, Peter J. J.	<>Mrs.
019160	1000.00	<>F0K<>G<>Dayton, Duncan M.	<>Mrs.
41483	1000.00	<>F0K<>G<>Ellis, David W.	<>Mrs.
523055	1000.00	<>F0K<>G<>Erlanger, Mary	<>Mrs.
19522	500.00	<>F0K<>G<>Feuerzeig, Henry L.	<>Mrs.
9917	500.00	<>F0K<>G<>Fleming, Virginia De C.	<>Mrs.
229983	1000.00	<>F0K<>G<>Friedman, David A.	<>Mrs.
517480	500.00	<>F0K<>G<>Garst, Stephen	<>Mrs.
120195	1000.00	<>F0K<>G<>Gillmor, Lisa M.	<>Mrs.
9112	500.00	<>F0K<>G<>Grady, Peter G.	<>Mrs.
29455	500.00	<>F0K<>G<>Hammer, Stephen A.	<>Mrs.
16552	500.00	<>LRT<>G<>Hammerstein, James	<>Mrs.
518801	500.00	<>F0K<>G<>Hammond, Susan Webb	<>Mrs.
12249	500.00	<>F0K<>G<>Hamovit, Jerry M.	<>Mrs.
12359	500.00	<>F0K<>G<>Harkrader, Lonna H.	<>Mrs.
13139	500.00	<>F0K<>G<>Hennessee, Jr. John W.	<>Mrs.
14021	500.00	<>F0K<>G<>Hodge, James R.	<>Mrs.
23203	500.00	<>F0K<>G<>Ignatius, P. R.	<>Mrs.
17485	500.00	<>F0K<>G<>James, K. Keith	<>Mrs.
19531	1000.00	<>F0K<>G<>Kaplan, Frances	<>Mrs.
26504	500.00	<>F0K<>G<>Kay, Saul H.	<>Mrs.
26504	500.00	<>F0K<>G<>Kay, Saul H.	<>Mrs.
10962	500.00	<>F0K<>G<>Kerr, Clark	<>Mrs.
22918	500.00	<>F0K<>G<>Leight, Ruth	<>Mrs.
9948	500.00	<>F0K<>G<>Linvillie, Kelli K.	<>Mrs.
11673	500.00	<>F0K<>G<>Lipton, Susan	<>Mrs.
25722	500.00	<>F0K<>G<>MacDonald, Mary Edward F.	<>Mrs.
19543	1000.00	<>F0K<>G<>MacNichol, Jr. Edward F.	<>Mrs.
1415	500.00	<>F0K<>G<>Miles, Jane A.	<>Mrs.
14212	500.00	<>F0K<>G<>Miller, Judith L.	<>Mrs.
12394	1000.00	<>F0K<>G<>Hills, Jack H.	<>Mrs.
12404	500.00	<>F0K<>G<>Hollo-Christensen, Johanna D.	<>Mrs.
27021	500.00	<>F0K<>G<>Wangle, John C.	<>Mrs.
26545	1000.00	<>F0K<>G<>Payne, Ancil H.	<>Mrs.
9965	500.00	<>LRT<>G<>Perry, William T.	<>Mrs.
16266	500.00	<>F0K<>G<>Perry, William T.	<>Mrs.
10096	500.00	<>F0K<>G<>Pongree, Sumner	<>Mrs.
1903	1000.00	<>F0K<>G<>Pratt, Paul L.	<>Mrs.
13681	500.00	<>F0K<>G<>Ralzman, Dorothy L.	<>Mrs.
20698	1000.00	<>F0K<>G<>Ross, Carol D.	<>Mrs.
19061	500.00	<>F0K<>G<>Ryan, Sharon Hill	<>Mrs.
16065	1000.00	<>F0K<>G<>Schoedinger, III, George R.	<>Mrs.
19093	1000.00	<>F0K<>G<>Schrenk, Jr. William	<>Mrs.
30527	500.00	<>F0K<>G<>Schwarzschlid, Barbara	<>Mrs.
519073	500.00	<>F0K<>G<>Simons, Merilyn H.	<>Mrs.
25788	500.00	<>F0K<>G<>Sinton, Robert E.	<>Mrs.

14031



99 "04" 393 "1769

Poc's Reconciliation List "7"

page two of two

5, 11270	<>7<>711	<> 500.00<>920806	<>054<>18<>FDK<>6<>Smith, Farwell	<>MR.
5, 18973	<>7<>2183	<> 500.00<>920806	<>048<>32<>FDK<>6<>Spitzer, Robert	<>MR.
5, 13827	<>7<>2200	<> 500.00<>920807	<>117<>22<>FDK<>6<>Stafford, Robert A.	<>MR.
5, 14056	<>7<>144	<> 500.00<>920807	<>114<>32<>FDK<>6<>Stark, Sheldon J.	<>MR.
5, 19887	<>7<>1515	<> 500.00<>920811	<>082<>31<>FDK<>6<>Summers, Victoria P.	<>Mrs.
5, 15289	<>7<>2870	<>1000.00<>920810	<>048<>19<>FDK<>6<>Tofias, Arnold B.	<>MR.
5, 29829	<>7<>1522	<> 500.00<>920810	<>026<>21<>FDK<>6<>Urban, Timothy J.	<>MR.
5, 13839	<>7<>1154	<> 500.00<>920807	<>117<>27<>FDK<>6<>Vasic, Gojko	<>MR.
5, 19597	<>7<>345	<>1000.00<>920811	<>084<>35<>FDK<>6<>Wayne, Charles B.	<>MR.
5, 19090	<>7<>747	<> 500.00<>920811	<>066<>35<>FDK<>6<>Willmore, Dena G.	<>Ms.
5, 24716	<>7<>7372	<>1000.00<>920813	<>110<>34<>FDK<>6<>Worth, Robert R.	<>MR.
5, 14063	<>7<>3249	<> 500.00<>920807	<>114<>35<>FDK<>6<>Zirin, Jane E.	<>Dr.

Break: 7 54,000.00

From Little Rock List "W"

14-26

POB3 Total: 22, 183.00

Name	Address	City	State	Zip	Amount	Date
Alexander, Jr.	Archibald S.	6777 Sykes Canyon Rd	MT	59715	1000.00	19821102
Allen	Charles W.	112 West 3rd Street	AR	72231	500.00	19821102
Alfred	James C.	324 Fairfax	AR	72205	1000.00	19821102
Angus	Mitchell M.	12905 Avenida L Vale	CA	92664	250.00	19821102
Bartlett	Mary Louise	2237 Spring Blvd.	OR	97403	130.00	19821102
Bergan	Marilyn	2501 Colorado Ave. S	CA	90404	250.00	19821102
Blondi	Carol O.	77 Heaton Rd.	NY	11530	1000.00	19821102
Blatteacher	Betsy K.	204 N. Mennee	AR	72205	220.00	19821102
Black	Frances B.	PO Box 130	AR	71587	1000.00	19821102
Brown	Adys	269 Rhodale Place	CA	90049	1000.00	19821102
Browns	Robin E.	PO Box 1231	AR	72231	700.00	19821102
Chandler	E. Ursula	PO Box 6 N/S	MA	03768	100.00	19821102
Crary	Stephen T.	PO Box 939-REFUND	AR	72650	79.00	19821102
Daniel	Alice N.	2226 Maul Rd. W. 1111 D	AR	71701	50.00	19821102
Canal	Roxane B.	715 Norman Ave. REFUND	TN	38256	50.00	19821102
Dunn	Creig	1339 W. Sherwood Ter	AR	72205	200.00	19821102
* Goldstein	Leonard M.	1414 San Carlos SW 3	MA	07104	100.00	19821102
* Hebbstreit	Catherine E.	3525 Bowland Rd.	VA	23234	100.00	19821102
* Hervey	Valerie B.	REFUND			100.00	19821102
Kala	Irelin J.	REFUND			100.00	19821102
Kearck	Andrew M.	110 Pine Ridge Road REFUND	MO	62631	23.00	19821102
Keller	Don R.	P.O. Box 135 REFUND	MO	65371	50.00	19821102
Leventhal	Norwan B.	468 Green Spring Cir REFUND	FL	32709	50.00	19821102
Luepkin	Barber L.	112 Haywood Hills Dr	VA	24179	100.00	19821102
Mason	Anna W.	140 Elbridge Rd.	CT	06852	1000.00	19821102
McCue	Melanie I.	140 Elbridge Rd.	CT	06852	1000.00	19821102
McCue	William J.	2681 W. Outer Hwy. 6	MO	63362	500.00	19821102
Meyer	Carolyn	REFUND			250.00	19821102
Meyer	Sylvan M.	REFUND			250.00	19821102
Millstone	Sacha REFUND	REFUND			20.00	19821102
Moore	Carolyn	REFUND			259.00	19821102
Morlan	John S.	HC 64 Box 82A	MO	65775	500.00	19821102
Nokes	Carol D.	21 Bergerac Lane	FL	72211	1000.00	19821102
Nolan	Theodosia Murphy	500 N. Madison	AR	71730	50.00	19821102
Patchen	Susan B.	4817 Toccoa Ln.	MD	53711	250.00	19821102
Pentell	Roberta	PO Box 400 J.	FL	32578	150.00	19821102
Ruder	William	430 E. 66th St. REFUND	NY	10020	250.00	19821102
Sable	Margie R.	22 N. Glenwood	MO	65203	50.00	19821102
Schneider	Irving	21-59 45th St.	AR	72478	1000.00	19821102
Sherman	Rosa M.	3033 West Lane Keys	DC	20007	250.00	19821102
Shorey	Joan B.	1041 Belmont Rd.	NY	11065	250.00	19821102
Siegel	Berry L.	409 E. 6th Street	MI	48104	150.00	19821102
Spencer	Frederick S.	10 Gracie Square	AR	72653	23.00	19821102
Stanton	Donna	8 Hillison Pl. REFUND	NY	10028	1000.00	19821102
Thone	Mary	727 E. 26th St. REFUND	AR	72001	100.00	19821102
Tiger	Michael E.	303 E. 83rd St.	TX	75705	600.00	19821102
Topor	Sharon	76 Hartsdale Ave.	NY	10028	100.00	19821102
Unger	Sidney E.	470 18th Street	NY	10005	1000.00	19821102
Unterhan	Suzanna K.	6341 Hartley Dr.	CA	90402	100.00	19821102
Vajji	John A.	612 Ft. Williams Pky REFUND	CA	92037	100.00	19821102
Waits	Grady	Drewer G	VA	22304	100.00	19821102
Watkins, Jr.	William M.	200 Bvd Blvd.	AR	72354	200.00	19821102
Webster, III	Sidney M.	48 Rock Spring Rd.	SC	29605	500.00	19821102
Weinstein	Sara R.	1120 Fifth Ave. Apt. REFUND	NY	07852	500.00	19821102
Wilford	C. H.	316 South 5th St.	NY	10020	500.00	19821102
Willoughby	Bernice J.	413 Howland Canal	MO	65791	23.00	19821102
Wolf		Venice	CA	90291	250.00	19821102

14033

GOA

99 04 253 177A

POC 2 - Total \$4,250

X

14 ✓ Aaron	Cory M.	3116 N. 18th St.	Arlington	VA	22201-	880	100.00	19921102
15 ✓ Blanchard	Charles H.	12 Eastshore Drive	Russellvil	AR	72801-	9485	500.00	19921102
16 ✓ Bradford	Eugenie R.	5926 Shadow Walk	Alexandria	VA	22310-	6473	150.00	19921102
17 ✓ Cohen	Christopher B.	185 Franklin	Glencoe	IL	60022-	493	25.00	19921102
18 ✓ Copley	Leslie M.	60 Hamilton Terrace	New York	NY	10031-	2060	100.00	19921102
19 ✓ Hill	Shirley	PO Box 385	Perryville	AR	72126-	4689	30.00	19921102
20 ✓ Rockefeller, Jr	David	Room 5600	New York	NY	10112-	10138	1000.00	19921102
21 ✓ Shalant	Frances T.	14948 Camarosa Dr.	Pacific Pa	CA	98272-	4850	1000.00	19921102
22 ✓ Shaver	Bonnie	588 N. Killough Rd.	Wynne	AR	72396-	3860	5.00	19921102
23 ✓ Shore	Dinah	c/o Perry & Neidorf	Beverly Hi	CA	90212-	2568	500.00	19921102
24 ✓ Straley	Joseph P.	145 Kentucky Ave.	Lexington	KY	40502-	661	490.00	19921102
25 ✓ Watkins	Richard	#50 Hickory Hills Ci	Little Roc	AR	72212-	1334	100.00	19921102
26 ✓ Meyer, Jr	Catherine	3007 Metropolis	Washington	DC	20016-		250.00	19921102

For List 1

Refunded 12/07

"X"
FROM Little Rock

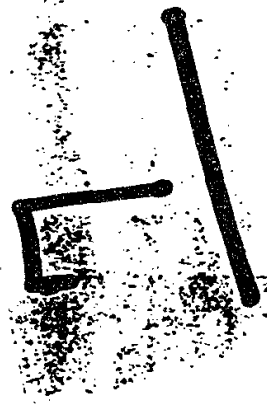
14-22

49-04-3543-172

 Break: 7 54,000.00
 W 15,850.00
 X 4,000.00

 73,850

1400
 283



~~65~~

P-7, W, X
 11-5-92

7 500
 X 250
 W 6333 ✓

 7083

73850
 1083

 80933

750

14035

POC's Reconciliation List "W"

1081

99.04.393.1775

0.	1129	<>W<>	1084	<>072<>	<>DMS<>	<>Allen, Charles W.	<>Mr.
1.	6599	<>W<>	9557	<>091<>	<>MAX<>	<>Bergman, Marilyn	<>Ms.
0.	2212	<>W<>	1572	<>027<>	<>GEN<>	<>Blondi, Carol Doughton	<>Mrs.
0.	15204	<>W<>	500	<>059<>	<>GEN<>	<>Browne, Robin E.	<>Ms.
0.	16439	<>W<>	476	<>195<>	<>MAX<>	<>Craty, Stephen T.	<>Mr.
3.	6834	<>W<>	5571	<>127<>	<>19<>	<>Goldstein, Leonard M.	<>Mr.
5.	4125	<>W<>	183	<>127<>	<>22<>	<>Hebenschreit, Catherine E.	<>Ms.
5.	2252	<>W<>	6457	<>087<>	<>16<>	<>Hervey, Valerie Bloom	<>Mrs.
0.	20131	<>W<>	612	<>017<>	<>22<>	<>McCue, Melania J.	<>Mrs.
0.	20133	<>W<>	611	<>017<>	<>21<>	<>McCue, William J.	<>Mr.
1.	26163	<>W<>	579	<>007<>	<>06<>	<>Meyer, Carolyn H.	<>Ms.
0.	10706	<>W<>	190	<>064<>	<>23<>	<>Meyler, Sylvan H.	<>Mr.
0.	3201	<>W<>	3115	<>044<>	<>21<>	<>Morlan, John S.	<>Mr.
0.	23853	<>W<>	2629	<>055<>	<>11<>	<>Nokes, Carol D.	<>Mrs.
1.	7896	<>W<>	259	<>127<>	<>31<>	<>Molan, Theodosia Murphy	<>Mrs.
0.	18552	<>W<>	3551	<>054<>	<>22<>	<>Patchen, Susan B.	<>Ms.
1.	25714	<>W<>	1706	<>152<>	<>10<>	<>Powell, Roberta	<>Mrs.
3.	19137	<>W<>	8551	<>077<>	<>12<>	<>Sable, Marjorie R.	<>Mrs.
1.	9082	<>W<>	1024	<>033<>	<>07<>	<>Schneider, Irving	<>Mr.
4.	16397	<>W<>	9342	<>090<>	<>26<>	<>Sherman, Rosa M.	<>Ms.
0.	23196	<>W<>	10869	<>039<>	<>31<>	<>Siegel, Barry L.	<>Dr.
3.	19142	<>W<>	1673	<>017<>	<>32<>	<>Spencer, Frederick S.	<>Mr.
0.	16298	<>W<>	1043	<>033<>	<>10<>	<>Stanton, Donna	<>Ms.
0.	11108	<>W<>	810	<>066<>	<>29<>	<>Tigar, Michael E.	<>Mr.
2.	4847	<>W<>	1965	<>057<>	<>31<>	<>Topor, Shimon	<>Mr.
2.	4847	<>W<>	1961	<>032<>	<>32<>	<>Unger, Sidney	<>Mr.
0.	15345	<>W<>	2221	<>066<>	<>30<>	<>Unger, Sidney	<>Mr.
1.	19640	<>W<>	137	<>218<>	<>13<>	<>Unterman, Thomas E.	<>Mr.
0.	5873	<>W<>	2796	<>011<>	<>29<>	<>Valji, Susanna Karney	<>Mrs.
0.	119	<>W<>	1837	<>103<>	<>34<>	<>Watkins, Jr., William M.	<>Mr.
1.	2154	<>W<>	7812	<>048<>	<>26<>	<>Webster, III, Sidney H.	<>Mr.
0.	26022	<>W<>	1114	<>035<>	<>26<>	<>Weinstein, C. H.	<>Mr.
1.	22463	<>W<>	5016	<>045<>	<>26<>	<>Wiltoughby, Bernice J.	<>Mrs.
2.	1911	<>W<>	799	<>048<>	<>36<>	<>Wolf, William J.	<>Mr.

Break: W 15,050.00

POC's Reconciliation of List "X"

Page 181

3 7 7 4

0. 3955	<>X<>880	<>100.00<>920804	<>054<>03<>	<>GEM<>G<>	<>Amron, Cory M.	<>Mr.
0. 1425	<>X<>9486	<>500.00<>920803	<>071<>02<>	<>GEM<>G<>	<>Blanchard, Charles H.	<>Mr.
2. 5197	<>X<>8473	<>150.00<>920803	<>068<>07<>	<>GEM<>G<>	<>Bradford, Eugenie Rowe	<>Mrs.
0. 2142	<>X<>493	<>25.00<>920729	<>108<>05<>	<>MAX<>G<>	<>Cohen, Christopher B.	<>Mr.
1. 4277	<>X<>2068	<>100.00<>920803	<>108<>01<>	<>GEM<>G<>	<>Corley, Leslie H.	<>Mr.
0. 4190	<>X<>4689	<>30.00<>920710	<>049<>05<>	<>GEM<>G<>	<>Hill, Shirley	<>Ms.
0. 1384	<>X<>10138	<>1000.00<>920430	<>012<>05<>	<>GEM<>G<>	<>Rockefeller, Jr., David	<>Mr.
1. 8847	<>X<>4860	<>100.00<>920803	<>134<>16<>	<>GEM<>G<>	<>Shalant, Frances T.	<>Mrs.
0. 5454	<>X<>3860	<>5.00<>920717	<>056<>29<>	<>GEM<>G<>	<>Shaver, Bonnie	<>Mrs.
0. 2077	<>X<>2568	<>500.00<>920720	<>019<>25<>	<>GEM<>G<>	<>Shore, Dinah	<>Ms.
2. 7992	<>X<>661	<>490.00<>920804	<>066<>25<>	<>GEM<>G<>	<>Straley, Joseph P.	<>Mr.
0. 8922	<>X<>1334	<>100.00<>920727	<>018<>36<>	<>GEM<>G<>	<>Watkins, Richard	<>Mr.

Prak: X 4,000.00

14037

POC'S RECONCILIATION RECAP

List 7 XFER 11-05-92

Page 5

14-24

REFUNDS

Garber, Jesse G.	1122	500.00
------------------	------	--------

List X XFER 11-05-92

REFUNDS

Wyler, Catherine		250.00
------------------	--	--------

List W XFER 11-05-92

REFUNDS

Alexander, A. S.	1763	100.00
Allred, James C.	2163	1000.00
Angus, Mitchell N.	399	250.00
Bartlett, Mary L.	1682	130.00
Blattmachr, Betsy M.	2723	250.00
Block, Frances G.		220.00
Brown, Addys		1000.00
Chandler, E. U.		700.00
Daniel, Alice N.		79.00
Daniel, R. B.		50.00
Dunn, Craig	6237	50.00
Kaim, Irwin J.	8766	100.00
Kamarck, Andrew M.		25.00
Koller, Don R.		50.00
Leventhal, Norman B.		250.00
Lumpkin, Barbara L.	4724	100.00
Maston, Anna W.	3276	100.00
Millstone, Sacha		20.00
Moore, Carolyn		259.00
Ruder, William	181	250.00
Shorey, Joan B.	0417	250.00
Thone, Mary	349	100.00
Tigar, Michael E.		300.00
Waits, John A.	166	100.00
Wilford, Sara R.	7013	500.00

Lists
"7" + "X" + "W"

6233.00

ON OTHER LISTS

Alexander, Jr., Archibald	1949	900.00	List 1	Submitted
Valji, Susanna Karney	137	100.00	List 1	Submitted
Sable, Marjorie R.	1706	50.00	List 1	Submitted

1050.00

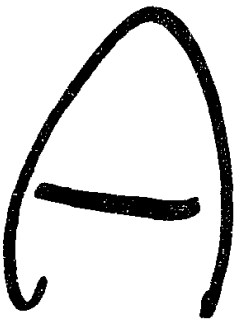
AMOUNT WITH PROBLEMS	8033.00
AMOUNT ON POC COMPUTER	73050.00
TOTAL ACCOUNTED FOR	81083.00
XFER AMOUNT	81683.00
UNACCOUNTED FOR DIFFERENCE	600.00

14038

49-034-393-375

First Page list "D"
from HQ in Little
Rock.

99 "04" 393 "1770" 19, 553 .60



Post Office Box 697 Lusby MD 20657- 3385 30.00 1992 0807	214 13th Street, South East Number 2 Washington DC 20003- 2551 25.00 1992 0810	Rural Route 2, Box 35 Albany IN 47320- 6443 15.00 1992 0813	549 West 123rd Street Apartment 21-A New York NY 10027- 1500 30.00 1992 0810	139 Essex Drive Chapel Hill NC 27514- 2232 100.00 1992 0819	617 Westend Avenue Number 10B New York NY 10024- 3742 75.00 1992 0806	22 Lakeview Road Winchester MA 01890- 2023 250.00 1992 0811	901 Brandenburg Street Cedar Hill TX 75104- 2503 50.00 1992 0810	2222 Lord Baranof Drive Anchorage AK 99517- 517 25.00 1992 0810
--	---	---	---	---	--	---	--	---

\$ transferred 1-12-93 for list "D" \$19,355.68

Ablard	James E.
Adams	Gina C.
Adams	James H.
Alexander	Lois K.
Alexander	Miriam H.
Allan	Leslie
Alper	Joshua M.
Anderson	Nancy J.
Argetsinger	Donald

OK D 3-4 Alexander

14039

GOA

99.04.353.1777

Wright

Barbara L.

26895 Via Grande
Mission Viejo CA 92691-
2192 50.00 1992 0807

Yudis

Michael B.

36 Reed Street
Lexington MA 02173-
1822 50.00 1992 0806

Zentner

Margret

262-04 60th Avenue
Little Neck NY 11362-
1324 20.00 1992 0811

Zimmerman

Peter Max

110 West 39th Street
Baltimore MD 21210-
853 25.00 1992 0807

Zuber, III

Charles B.

900 Dunbarton Drive
Richardson TX 75081-
2809 100.00 1992 0810

14040

1st Page

List "D"
from HQ in
Little Rock

← Contemporaneous
note referring to
"them" when
balancing for
POC reconciliation
of their list.

520

99-04 ne 99-177B

18,192.68

19,355.68

640

14032.68

Break: 0

List D

- 3-10 ✓ Baker, Emily CK# 1277 \$25.- LB
3-10 ✓ Barron, June B. CK# 7797 \$15.- List B
3-10 ✓ Benson, George Z. #609 \$15.- LB
3-10 ✓ Carlson, Eric S. #7059 \$25.- LB
3-10 ✓ Crocker, Catherine #5705 \$50.- LB
3-10 ✓ Davison, Virginia V. #2405 \$50.- LB
3-10 ✓ Fishkin, Rose M. #2623 \$25.- LB
3-10 ✓ Johnson, Eric CK# 1344 \$125.- (has diff. add.) LB
3-10 ✓ Lipman, Simone M. CK2444 \$50.- List B
3-10 ✓ Mears, Ric D. CK1724 \$25.- LB
3-10 ✓ O'Brien, Rosemary G. CK283 \$100.- LB
3-10 ✓ O'Connell, Mary Jane CK9153 \$10.- LB
3-10 ✓ Volosky, Winifred N. CK#10754 \$100.- LB

Refund

- 3-10 ✓ Soto, Felix R. CK# 4920 \$25.-

6410.⁰⁰

POC'S Balancing NOTE. 14042

List D XFER 01-12-93

14-28

REFUNDS

Soto, Felix R. 4920 25.00

ON OTHER LISTS

Baker, Emily	1277	25.00	list B
Barron, June B.	7797	15.00	list B
Benson, George Z.	609	15.00	list B
Carlson, Eric S.	7059	25.00	list B
Crocker, Catherine	5705	50.00	list B
Davison, Virginia V.	2405	50.00	list B
Fishkin, Rose M.	2623	25.00	list B
Johnson, Eric	1344	125.00	list B
Lipman, Simone M.	2441	50.00	list B
Mears, Ric D.	1724	25.00	list B
O'Brien, Rosemary G.	283	100.00	list B
O'Connell, Mary Jane	9153	10.00	list B
Volosky, Winifred N.	10754	100.00	list B

615.00

AMOUNT WITH PROBLEMS

640.00

AMOUNT ON POC COMPUTER

18192.68

TOTAL ACCOUNTED FOR

18832.68

XFER AMOUNT

19355.68

UNACCOUNTED FOR DIFFERENCE

523.00

99-04-393-782

Poc's Reconciliation

List "M"

perfect balance
apparently -

- no source documents
available -

49 - 24 - 393 - 1783

<>	091<>17<>OK	<>	P<>Jacoby; Henry J.	<>	Mr.
<>	010<>18<>OK	<>	P<>Koemaker, Winifred	<>	Mrs.
<>	031<>28<>OK	<>	P<>Starn, Aaron	<>	Mr.
<>	085<>32<>OK	<>	P<>Strom, Vernon D.	<>	Mr.

<>	200.00<>920709	<>	200.00<>920709
<>	100.00<>920618	<>	100.00<>920618
<>	200.00<>920709	<>	200.00<>920709
<>	10.00<>920630	<>	10.00<>920630

510.00

Break: M



Transfers Out of "Suspense" Account

The following pages show contributions represented in batches of redesignation statements which Little Rock staff received for contributions that had been deposited in the newly opened "suspense account".

The Little Rock staff computerized the data on the redesignation statements and sent the computerized information to Pat Anderson at POC so that the contributions being shifted to the Compliance fund could be so noted in the original contribution records on POC's computer. This process was managed by Barbara Yates and Allen Wegehof in Little Rock.

Represented are Lists E, 4, 8, 9, 0, A, B, C, Y, S and J.

POC Rec "E"

Page 385

99-04-393-1787

0.2614	<>	5762	<>	20.00	<>	920821	<>	18	<>	6E	<>	Koastet, y, Bernard	<>	Mr.
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6.7784	<>	5765	<>	15.00	<>	920902	<>	01	<>	16	<>	Metoyer, Herman	<>	Mr.
6.7858	<>	5766	<>	500.00	<>	920904	<>	01	<>	26	<>	Miller, Frank	<>	Mr.
6.4215	<>	5767	<>	50.00	<>	920821	<>	24	<>	23	<>	Miller, Leona W.	<>	Mrs.
6.8317	<>	5768	<>	25.00	<>	920904	<>	09	<>	32	<>	Holley, David Scott	<>	Mr.
6.5068	<>	5769	<>	30.00	<>	920825	<>	08	<>	21	<>	Montgomery, Harriet	<>	Mrs.
6.3815	<>	5770	<>	50.00	<>	920901	<>	05	<>	16	<>	Moore, Donald B.	<>	Mr.
6.6222	<>	5771	<>	100.00	<>	920828	<>	04	<>	21	<>	Moore, Douglas L.	<>	Mr.
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6.4052	<>	5773	<>	20.00	<>	920824	<>	01	<>	08	<>	Morgestern, Murry	<>	Dr.
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6.6842	<>	5783	<>	25.00	<>	920828	<>	09	<>	12	<>	Nash, Steven	<>	Mr.
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6.6820	<>	5785	<>	100.00	<>	920828	<>	10	<>	36	<>	Neal, Paul	<>	Mr.
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6.8229	<>	5789	<>	30.00	<>	920908	<>	03	<>	27	<>	Neumann, Arlene J.	<>	Mr.
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6.8888	<>	5807	<>	25.00	<>	920828	<>	01	<>	26	<>	O'dlen, Max	<>	Mr.
6.8888	<>	5808	<>	100.00	<>	920828	<>	02	<>	22	<>	O'dham, Charles Carlton	<>	Mr.
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6.8888	<>	5814	<>	10.00	<>	920828	<>	03	<>	29	<>	Owens, Bobby L.	<>	Mr.
6.8888	<>	5815	<>	20.00	<>	920824	<>	04	<>	24	<>	Owens, Joyce L.	<>	Mrs.
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6.8888	<>	5818	<>	10.00	<>	920824	<>	01	<>	22	<>	Owens, Judith	<>	Mrs.
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6.8888	<>	5831	<>	50.00	<>	920828	<>	04	<>	23	<>	Owens, Donna Marie	<>	Mrs.

14050

POC's Reconciliation List "E"

LAST PAGE
of 5

6.	642	1	3363	<<	20.00	<>	990908	<>	004	<>	37	<>	GEN	<>	Stick	<>	Mr.
6.	7911	1	078	<>	100.00	<>	990821	<>	010	<>	34	<>	GEN	<>	Stirling	<>	Ms.
6.	6222	1	268	<>	10.00	<>	990831	<>	001	<>	12	<>	GEN	<>	Stolberg	<>	Mr.
6.	6220	1	195	<>	10.00	<>	920828	<>	014	<>	22	<>	GEN	<>	Strausbaugh	<>	Mr.
6.	1924	1	400	<>	35.00	<>	990828	<>	008	<>	30	<>	GEN	<>	Strned	<>	Mrs.
6.	1495	1	863	<>	10.00	<>	990824	<>	015	<>	32	<>	GEN	<>	Stroup	<>	Mrs.
6.	4153	1	295	<>	10.00	<>	920824	<>	014	<>	22	<>	GEN	<>	Sublett	<>	Mr.
6.	5161	1	348	<>	100.00	<>	990825	<>	022	<>	33	<>	GEN	<>	Symonds	<>	Mrs.
6.	7235	1	425	<>	25.00	<>	990901	<>	003	<>	22	<>	GEN	<>	Tate	<>	Mrs.
6.	7163	1	277	<>	50.00	<>	920831	<>	013	<>	15	<>	GEN	<>	Tate	<>	Mrs.
6.	3403	1	195	<>	100.00	<>	920821	<>	038	<>	33	<>	GEN	<>	Tate	<>	Ms.
6.	7488	1	487	<>	100.00	<>	990825	<>	022	<>	33	<>	GEN	<>	Tepper	<>	Mr.
6.	6934	1	810	<>	30.00	<>	990901	<>	012	<>	33	<>	GEN	<>	Thoenes	<>	Ms.
6.	8281	1	011	<>	50.00	<>	920831	<>	001	<>	12	<>	GEN	<>	Thomas	<>	Mr.
6.	8281	1	16	<>	10.00	<>	990904	<>	045	<>	34	<>	GEN	<>	Thresh	<>	Mr.
6.	7858	1	83	<>	50.00	<>	920821	<>	006	<>	44	<>	GEN	<>	Timons	<>	Ms.
6.	7144	1	327	<>	20.00	<>	990902	<>	012	<>	31	<>	GEN	<>	Tyson	<>	Mr.
6.	12711	1	123	<>	100.00	<>	990831	<>	012	<>	33	<>	GEN	<>	Veohoff	<>	Mr.
6.	6933	1	137	<>	10.00	<>	990827	<>	022	<>	07	<>	GEN	<>	Vinson	<>	Mrs.
6.	5218	1	483	<>	20.00	<>	990828	<>	014	<>	22	<>	GEN	<>	Von Deutsch	<>	Ms.
6.	7996	1	453	<>	13.00	<>	920903	<>	003	<>	31	<>	GEN	<>	Walworth	<>	Mr.
6.	7895	1	309	<>	300.00	<>	990902	<>	002	<>	24	<>	GEN	<>	Ward	<>	Mr.
6.	3812	1	448	<>	50.00	<>	990902	<>	013	<>	18	<>	GEN	<>	Wiener	<>	Mr.
6.	4228	1	535	<>	10.00	<>	920821	<>	010	<>	38	<>	GEN	<>	Williams	<>	Mr.
6.	3388	1	285	<>	20.00	<>	990821	<>	024	<>	39	<>	GEN	<>	Winters	<>	Mr.
6.	3388	1	285	<>	50.00	<>	990821	<>	004	<>	05	<>	GEN	<>	Withee	<>	Mr.

Break: E 27,891.51

14-34.

NO POC RECAP

list "E"

in perfect

Balance.

with list "E"

Received from

Little Rock.

14053

0571-262-40-66
99-04-293-1790

Readers/Donated from Subscribers

Aaronson	Robert B.	201 St. Paula Ave. #4G
Abbott	Mur'fel M.	249 East 48th St.
Ables, Jr.	Waylen	2000 Dundee Rd.
Accurso	Lina	52 Rock Ridge Drive
Ackerman	Roger M.	117 Snowden St.
Adams	Ben	2019 N. Beverly Dr.
Adams	Constance M.	4827 Berkley St.
Adams	Gerald Warren	1534 Grand Avenue G-4
Adams	Nellie M.	PO Box 103
Adams	Parks M.	102 E. 3rd Street
Adams	Jane	3 Evergreen Court
Adessa	S. L.	2317 E. Olive St.
Afflerbach	C.W.	7307 Oakwood Dr.
Ahern	Elizabeth C.	60 M. Fillmore St.
Ahn	Junk	2123 Rodney Drive #103
Ahsworth	Elynn Kadel	9551 93rd St., N
Aisenberg	Elaine	16155 Toulouse
Alcala	James	160 E. 89th Street
Aldrich	Mary J.	5030 West 16th St.
Alexander	Virgil F.	3533 98th Ave. N
Alexander	Janet R.	57 Woodlawn Ter.
Alexander	Richard B.	1520 Heatherwood Rd
Afford	Dwight Lynn	294 Rock Rd.
Alibrandi	Thomas C.	417 2nd Street, #1
Alkuz	Stephen	3707 Livingston Dr. #302
Allen	Arnold A.	1434 E. Lawrence
Allen	Ethan	104 E 68 St
Allen	Karen R	340 Sumkist Lane
Allen	Loretta	2490 Pine Ave.
Allen	Walter R.	14808 Center Ave.
Allender	Sylvia F.	13507 Glendudee Drive
Allison	Blake P.	159 Mt. Auburn St.
Allison	Clara	10 Point Comfort
Allison	Majorie S.	1775 S. Clarkson St. No.1
Almond	Richard H.	P. O. Box 9059
Alper	Evelyn	154 Fountain St.
Alper	Paul B.	11 Yorktown Road
Alpert	Hubert J.	6423 Hollins Dr.
Alpert	Shirley H.	444 E. 82nd St.
Alphin	Gilbert	P.O. Box 101
Alter	Amos	11 Riverside Dr
Alve	Harlene	4 Place De La Concorde
Ambrose, Jr.	Joseph	2150 Summitridge Drive
Amend	Gaylee	702 E. Home
Amos	Mindy R.	35 Oakwood Ave
Amos	Haomi	17300 Corkill Rd
Amster	Harvey J.	4208 Ridgemont Ct.
Anderson	Arnold E.	2305 Brooklyn Ave., SW
Anderson	Betty E.	4052 N. Ozark Ave.
Anderson	Hallie	6128 Kantor St
Anderson	Leoda	3105 Wheeler St.
Anderson	Linda S.	810 31st Ave. N

MJ07306-	Jersey City,	50.00	08/27/92	1918
NY10017-	New York	50.00	08/27/92	2278
MD20850-	Rockville	100.00	09/02/92	3312
NY10573-	Port Chester	5.00	09/24/92	2469
SC29150-	Sumter	50.00	08/25/92	5040
CA90210-	Beverly Hills	15.00	08/28/92	3792
NC28655-	Morganton	250.00	08/25/92	1211
CA90804-	Long Beach	100.00	08/28/92	6466
MS38860-	Oaklona	40.00	08/21/92	6994
MD46962-	North Manchester,	100.00	08/25/92	583
AR72207-	Little Rock	400.00	08/24/92	3197
WI33211-	Milwaukee	100.00	09/08/92	5667
TX78753-	Austin	100.00	08/27/92	1002
VA22201-	Arlington,	250.00	08/21/92	4086
CA90027-	Los Angeles	100.00	09/04/92	348
FL34667-	Seminole	100.00	08/25/92	1235
MI48026-	Fraser	15.00	09/04/92	2724
NY10128-	New York	50.00	08/24/92	561
CA92703-	Santa Ana	25.00	08/26/92	6323
FL34666-	Pinellas Park	70.00	08/31/92	920
NJ07849-	Lake Hopatcong	100.00	09/02/92	6177
SC29205-	Columbia	1000.00	08/28/92	0206
TX37357-	Morrison	5.00	09/17/92	MO
CA95060-	Santa Cruz	25.00	08/24/92	1209
CA90803-	Long Beach	100.00	08/31/92	3222
IL62521-	Decatur	50.00	08/21/92	125
NY10021-	New York	1000.00	08/21/92	1585
CA94022-	Los Altos	100.00	08/24/92	448
CA90806-	Long Beach	20.00	09/08/92	2828
IL60426-	Harvey	50.00	08/24/92	583
VA22071-	Herrndon,	25.00	08/24/92	2643
MA02138-	Cambridge	200.00	08/21/92	1233
CT06385-	Waterford	25.00	08/21/92	5252
CO80210-	Denver	100.00	08/24/92	MO
PA18105-	Allentown,	20.00	09/06/92	1993
CT06515-	New Haven	25.00	09/08/92	6327
NJ07470-	Wayne	25.00	09/01/92	1269
MD20817-	Bethesda	200.00	09/01/92	2378
NY10028-	New York	25.00	08/28/92	0734
NC28649-	Kure Beach	25.00	08/21/92	3731
NY10023-	New York	1000.00	08/24/92	367
CA92210-	Beverly Hills	250.00	08/21/92	1192
CA93728-	Fresno	25.00	09/08/92	526
PA17055-4730	Mechanicsburg	30.00	08/25/92	1452
CA92240-	Desert Hot Springs	30.00	08/21/92	1630
CA94619-	Oakland	35.00	08/27/92	1221
OH44706-	Canton	14.00	08/27/92	203
IL60634-	Norridge	25.00	08/21/92	1063
CA92122-	San Diego	100.00	08/21/92	501
TX78705-	Austin	10.00	08/26/92	2566
MN55411-	Minneapolis	15.00	09/04/92	4170

Transferred 10-6-92 \$251,608.88 for List "4"

1st Page of List "4" from Little Rock Headquarters. sent to POC

4

JA

14054

Hymen
 Hymen
 Yabroff
 Yarusitus
 Yarbrough
 Yatea
 Yee
 Yelenosky
 Yocum
 Young
 Young
 Young
 Young
 Yrige
 Yuater
 Zadorozny
 Zehajko
 Zehn
 Zehrachek
 Zales
 Zemora
 Zander
 Zarrow
 Zetuchni
 Zbyk
 Zech
 Zellinka
 Ziccardi
 Zimmerman
 Zimmerman
 Zinn
 Zipp
 Zitomar
 Zolan
 Zook
 Zorn
 Zuber
 Zuckerman
 Zucron

Michael S.
 Walker D.
 Leah
 Beatrice E.
 Anale H.
 Gordon C.
 Robert
 Catherine
 Sally W. A.
 Deborah A.
 Gertrude A.
 Nancy R.
 Joseph A.
 Lorraine
 Edward A.
 Alex
 Mrs. Lamar A.
 Al
 Jerome J.
 Nancy
 Florence A.
 Mrs. Jack
 Michael I.
 Len B.
 Alfred
 Grete
 Thomas
 Leah M.
 Christine G.
 Michael T.
 Margery P.
 Alan S.
 Violet
 Miriam E.
 Bonnie
 George R.
 Irving
 Lillian

P.O. Box 7460
 807 N. School
 1587 Maitland Drive #315
 705 Date Palm Dr.
 Rt 1, Butterfield Place
 1204 Calico Ln., Unit 712
 1401 1/2 Brick Rd
 15900 Arla Cove
 45 Encina Drive
 34 Edgewood Rd.
 12 Hackensack Ave.
 2025 N. Garfield
 2178 Pamf Cir.
 5831 Washington Street
 2703 Rockefeller Lane #2
 531 NE 86th St.
 3819 Joanne Dr.
 810 Spokane E
 2950 Livingston St.
 857 Arlington Ave.
 274 Church St., 8-0
 2660 S. Birmingham Pl.
 202 Fairfax Court
 26 Oak St.
 6768 Hillbriar Dr
 704 Columbus Avenue Apt 6-0
 1 Fern Ter.
 1590 Anderson Ave.
 204 N. Ingham
 310 W. Military Rd.
 Box 589
 932 Mungerford Dr., #13
 3831 Lansdale Ct
 1327 Sheriden Rd.
 10 Bayou Cove
 81 West Street
 354 W. 23rd St. Apt. GC
 1255 New Hamp Ave HW #404
 125 Montana Ave

11621 Barrett

LAST PAGE of List "4"
 from Little Rock HQ
 sent to POC

MD20907-	Silver Spring	1000.00	09/08/92	779
IL61761-	Normal	50.00	08/25/92	3730
OH44124-	Mayfield Heights	25.00	09/08/92	275
FL33403-	Lake Park	10.00	09/28/92	806
AR72135-	Roland	22.00	08/31/92	5723
TX76011-	Arlington	25.00	08/24/92	1208
WA98926-	Ellensburg	20.00	08/21/92	1828
TX78717-	Austin,	35.00	08/24/92	952
CA93924-9432	Carmel Valley	1000.00	09/02/92	2351
MA01545-	Shrewsbury	50.00	08/31/92	50
WY12885-	Warrensburg	25.00	08/21/92	5144
AR72207-	Little Rock	50.00	08/21/92	1262
CA92667-	Orange	35.00	08/24/92	1728
IL60516-	Downers Grove	25.00	08/27/92	4758
CA90278-3904	Redondo Beach,	250.00	08/21/92	2590
WA98115-	Seattle	15.00	09/27/92	1046
GA31907-	Columbus	50.00	08/21/92	5523
WA98926-	Ellensburg	25.00	08/25/92	5373
PA18104-	Allentown	50.00	08/31/92	2466
CA94608-	Oakland	10.00	08/27/92	6459
CT06437-	Guilford	100.00	08/21/92	686
OK74114-	Tulsa	100.00	08/21/92	665
PA19087-	Wayne	25.00	08/26/92	1469
CT06066-	Rockville	100.00	08/28/92	1260
TX75248-	Dallas	200.00	08/21/92	2145
NY10023-5901	New York	15.00	09/02/92	4165
HJ07470-	Wayne,	25.00	08/25/92	142
HJ07024-	Fort Lee	30.00	08/31/92	3751
HI49224-	Albion	10.00	09/08/92	1744
W54674-	Rothschild	30.00	08/21/92	2259
MA02541-	Falmouth	35.00	08/25/92	3032
MD20850-	Rockville	100.00	08/28/92	6692
MD20866-	Burtonville	10.00	08/25/92	2728
IN47401-	Bloomington	250.00	08/31/92	977
AR71654-	McGehee	250.00	08/27/92	427
CT06237-	Columbia	50.00	09/02/92	1429
NY10011-	New York	150.00	08/25/92	1777
DC20036-	Washington	50.00	08/25/92	1762
CA90493-	Santa Monica	50.00	08/21/92	645

POC's Reconciliation

LAST PAGE

List "4"

(6. 3220) <> 4 <> 645 <> 50.00 <> 920821 <> 005 <> 38 <> FDK <> G <> Zucrow, Lillian <> Ms.
Break: 4 249,583.76

14057

List 4 XFER 10-06-92

POC'S RECONCILIATION
'RECAP' Page. 7
list "4" (14-37)

NSF

Novitch, Mark 4436 1000.00

REFUNDS

Zelinka, Grete 4165 15.00

UNABLE TO IDENTIFY

Finan, Sheila A. 2355 50.00

AMOUNT WITH PROBLEMS 1065.00
AMOUNT ON POC COMPUTER 249583.76
TOTAL ACCOUNTED FOR 250648.76
XFER AMOUNT 251608.88
UNACCOUNTED FOR DIFFERENCE 960.12

99 24 393 1795

TRANSFERRED

72 - SUSPENSE

Albrecht Catherine Ann
 Aldridge Maggie D.
 Allen Leroy
 Alkoby Judith
 Alschuler John H.
 Backus Faith F.
 Bailly Alan
 Balzer Janet
 Banning Catherine M.
 Barenberg David
 Baxter Brent
 Behar David
 Benton Florence E.
 Bergner Regina R.
 Barson Emanuel D.
 Biers Reva
 Bluestone Eric
 Boehm Barry
 Bottighelmer Katherine H.
 Boyle Janet S.
 Brand John E.
 Brantley Loren H.
 Bredt Gideon Gigs
 Breyer Joanna
 Carlner Geoffrey
 Carlson, Jr. Robert H.
 Carter Michael C.
 Concilus Robert
 Contardo Joseph
 Cronin Mary J.
 Dancis Jerome
 Darling Ruth W.
 Deakins Jack G.
 Dent Doris L.
 Dixon Head
 Docherty John P.
 Dolan Richard
 Donnelly Bernard P.
 Duff Mrs. Arthur
 Dunn James F.
 Dunne Katherine
 Dusenbury Linda A.
 Dyas Michael D.
 Edelstein Joel K.
 Edwards Alyce F.
 Edwards Mary H.
 Entloe Roger
 Fairley Laura Man
 Finnerty Eileen
 Fornaris Maria
 Frades Sandra
 Frankenberg Dirk
 Freeman V. J.
 Gaines Evelyn
 Getoff Jean
 Gilbert Sylvia
 Ginsburg Bernice K.
 Goldberg Carl
 Goralski Frank
 Graves Barbara S.
 Greenwood Joan V.
 Grice Paul E.
 Gross Susan

3301 Gibbons Ave.
 836 Arnold Street
 5201 Connecticut Ave #409
 9129 Tee Drive
 59 West 71st St.
 1748 Dixon St.
 1312 NE Tillmook St.
 3783 Cynthia Dr.
 4999 Kahala Ave., Apt. 410
 484 Lowell Ave.
 3903 NE 45th #406
 12 Sierra Ave
 18431-125th Avenue
 1939 N. Cleveland
 P.O. Box 327
 4631 Ellenika Ave.
 2303 Keyatone Ct.
 Union Field Rd., Box 677
 500 Fifth Ave.
 1602 Gardiner Ln., Apt. 125
 85 Charlton Rd.
 P. O. Box 238
 3933 Llano Drive
 2908 Clearview Dr.
 12 Dunstable Road
 155 Temple St.
 682 Holly Ave., #1
 86 Ord St
 Box 758 RD#5
 700 Washington St
 109 James Dr., SW.
 5-H Laurel Hill Rd.
 111 Midway Rd.
 9717 Pebble Beach
 4431 Laurel Grove
 P.O. Box 12968
 8 Massachusetts Rd.
 2329 Kansas Avenue
 729 Columbia Dr.
 Box 3208
 90 Edgewater Dr.
 3721 Brown Ave.
 3 Briar Close
 6009 Becklick Road
 Beson Mnr. #6-1
 26 Oleander Dr.
 43 Boston Rock Rd.
 16 Euclid Ave
 55-Paradey St.
 717 5th Ave South
 411 Cook St.
 PO Box 610262
 Melendy Road
 131 E. Queen Street
 209 Sebastian Dr.
 46 Palm Avenue
 251 West 89th St.
 Seville Drive B-48
 232 Fairmont Ave.
 21 Jockey Holley Drive
 7171 W. Gunnison
 143 Idle Hour Dr.
 2091 San Francisco Ave.
 637 Mountain Ave., SW
 2420 Beman Ct.

Balto
 Baycross,
 Washington
 Mercersburg,
 New York
 Redondo Beach,
 Portland
 Pittsburgh
 Honolulu
 Newtonville
 Seattle
 San Anselmo
 Sun City West
 Chicago
 Suffern
 Tarzana
 Boulder,
 Truro,
 New York
 Louisville
 Rochester
 Green Valley
 Plano,
 Austin
 Cambridge
 Newton
 St. Paul
 San Francisco
 Headville,
 Denver
 Vienna
 Greenbelt
 Ithaca,
 Santee
 Studio City
 Reno,
 Kashua
 Santa Monica
 Sacramento
 Bristol
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 Northport,
 Melrose
 Ardsley
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 Columbus,
 De Pere
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 Hillford
 Hillsborough,
 Hillbrae
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 08/28/92

List 8" from L.R. ARKANSAS

M.S.S. 14-3
 MS

22,191.00

transferred 10-15-92 \$22,191.00 for List "8"

4059 USA

Pray, Jr. 5463 W Frances Rd
 Provin 2625 Martinez Dr.
 Pugh 4614 Black River Court
 Pulster 80 Aberdeen Avenue
 Ramos 2711 Westminster Way
 Rane P. O. Box 2344
 Ridgley 42851 15th St. W #1
 Roberts 2230 Oakdale Rd.
 Robinson, Jr. 1800 Nancy Creek Bluff, NW
 Rogers 788 Longmeadow St.
 Roebblett c/o Northern Trust Co.
 Rosenfield 329 Rt 103A
 Rosenfield 527A Union St.
 Rossebo 20342 Runnymede St.
 Russell RR 71 Box 152 A
 Russell 3005 S. 4th
 Rymson 2864 Alfred Street
 Sablow 2936 Caballero Dr., N.
 Saffrin 24 Ludwig Park
 Salz Harry B. P. O. Box 755
 Santora Nick 1849 Sandalwood Drive
 Saunders Louise H. 7200 York Ave. S.
 Schroeder Patricia M. 109 W. 25th St.
 Schweers Marie 621 Chapman
 Scoble Fran M. 315 Medeline Dr.
 Scott Marcia L. 24 E. Fourth St.
 Sheppard Martha P. 3903 NE 45th #406
 Sherman James Robert 25 Oak Drive
 Shubin Judy 504 Keokuk St
 Sney Snow Cecelia A. 4841 Sprague
 Snyder Bernice 12101 SW 68 Court
 Soyka Charles R. 705 Taylor Dr.
 Spickard Peter A. 403 Old Town Court
 Sprecher Donald E. 1111 Mc Gilvra Blvd. E.
 Stare Helen 1936 Chilton
 Starkey Jane 81 S. Pine St.
 Strauss Lois A. 311 12th St., SE.
 Thinh David H. P.O. Box 534
 Thompson Tram Quoc 832 Broadway, No. 6
 Towne Greg 490 Park St.
 Tuchin Dudley H. 30 Dona Place
 Tucker William 10501 Wilshire Blvd.
 Turner Jeffrey P. 1733 Sunset Avenue
 Uplinger Larry 2289 Salisbury Dr.
 Vanderborgh Karen M. 1216 Westmoreland Ave.
 Volkening Nicholas E. 660 Los Pueblos
 Wake Lee R. 608 Margaret Pl.
 Warren Mervalee H. 999 Middlefield Rd.
 Wavell Carol Elizabeth 21 Harlem St.
 Wechsler Joan B. 700 Helrose Avenue
 Weiss Monroe S. 3602 Woodland
 West Lawrence R. 344 NW Macley
 Wilkinson Peter 5022 Valdo Ave.
 Wilson Stephen 353 S. Carmelo Avenue
 Wilton Robert H. 330 Waverly Ave.
 Winter R.D. 4000 Bell Atlantic Tower
 Womac Mary G. 2267 Rosina Drive
 Wood Philip S. 1165 Fifth Ave
 Wunsch Harry Jane. 89 Luyster St.
 Yarblon Lionel 2815 N. Springfield
 Zemora Robert 209 13th Avenue N.
 Zereby Florence 16 Crescent St.
 Nicholas Robert S. 124 Llenfair Rd.
 Florence 1227 De Haro St.
 Nicholas 1011 Ashland Ave.

Clio MI48420-
 Burlingame CA94010-
 San Jose CA95136-
 Cambridge MA02138-4611
 Huntsville, AL35801-
 Taos NM87571-2344
 Lancaster CA93536-
 Burlingame CA94010-
 Atlanta GA30327-1913
 Longmeadow MA01106-
 Chicago IL60675-
 New London, NH03257-
 San Francisco CA94133-
 Canoga Park CA91306-
 Tanner WV26179-
 Austin TX78704-
 Lakewood, CO90712-
 Jacksonville FL32217-2743
 Rochester 14621-
 Tuxedo, NY10987-
 Sarasota, FL34231-
 Edina, MN55435-
 Sioux Falls SD57105-
 Madison WI53711-
 Pasadena CA91105-
 The Plains OH45780-
 WA98105-
 Seattle WA98105-
 Durham NC27707-
 San Francisco CA94122-
 Petaluma CA94952-
 Omaha, NE68104-
 FL33156-
 Miami, FL33156-
 Carbondale, IL62901-
 Alexandria VA22314-
 Seattle WA98112-
 Las Cruces NM88001-
 Newark OH43055-
 Washington DC20003-
 Majuro, Marshall Isl 96960-
 New York NY10003-
 Beaumont TX77701-
 Amherst NY10002-
 Los Angeles CA90024-
 Santa Monica CA90405-
 Naperville IL60565-
 Syracuse NY13210-
 Los Alamos, NM87544-
 Elgin IL60120-
 Berkeley CA94708-
 Rochester NY14607-
 Winter Park FL32789-
 Ames IA50010-
 Portland OR97210-
 Bronx NY10471-
 Pasadena CA91107-
 Newton MA02158-
 PA
 Philadelphia, OH45342-
 Miami, FL33109-
 New York, NY10029-
 Huntington Station NY11746-
 Chicago IL60618-
 St. Petersburg FL99701-1121
 Cambridge MA02138-
 Ardmore PA19003-
 San Francisco CA94107-3236
 Evanston, IL60202-

50 S. La Salle St.
 14318
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 14318

No. C-21
 1717 Arch St
 14061
 Yablon

1437
602-EX-30

POC'S WORKING
papers for
list "8"

Mr. [unclear]
Mr. [unclear]

①

1	1477	d	<>	20	00	<>	Kopech, David	<>	Mr.
1	14779)	<>	250	00	<>	Kopech, David	<>	Mr.
1	14720	<>	<>	800	00	<>	Sues, Christopher J.	<>	Mr.
1	14720	<>	<>	21	12	<>	Sues, Christopher J.	<>	Mr.
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6	3511	<>	<>	15	00	<>	Aldridge, Maggie D.	<>	Mrs.
3	19167	<>	<>	100	00	<>	Allen, Leroy	<>	Mr.
6	5382	<>	<>	20	00	<>	Alloway, Judith L.	<>	Mrs.
6	3760	<>	<>	250	00	<>	Alschuler, Jr. John H.	<>	Mr.
6	6590	<>	<>	100	00	<>	Backus, Faith F.	<>	Mr.
6	7685	<>	<>	10	00	<>	Bailly, Alan	<>	Mr.
2	24868	<>	<>	15	00	<>	Balzer, Janet E.	<>	Mrs.
2	112909	<>	<>	25	00	<>	Banning, Catherine M.	<>	Mrs.
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6	7693	<>	<>	50	00	<>	Baxter, Brent	<>	Mr.
6	4909	<>	<>	50	00	<>	Behar, David	<>	Mr.
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6	8392	<>	<>	50	00	<>	Bergner, Regine R.	<>	Mrs.
6	4176	<>	<>	50	00	<>	Berson, Emanuel Dover	<>	Dr.
6	7367	<>	<>	200	00	<>	Blers, Reva	<>	Ms.
6	4719	<>	<>	60	00	<>	Blank, Eric	<>	Mr.
6	6377	<>	<>	250	00	<>	Bluestone, Barry	<>	Mr.
5	11359	<>	<>	100	00	<>	Boehm, Robert L.	<>	Mr.
2	25261	<>	<>	5	00	<>	Bottighelm, Katherine H.	<>	Ms.
6	4213	<>	<>	50	00	<>	Boyle, Janet S.	<>	Ms.
6	4298	<>	<>	5	00	<>	Brand, John E.	<>	Mr.
6	3518	<>	<>	50	00	<>	Brantley, Loren H.	<>	Mr.
6	12983	<>	<>	10	00	<>	Bredt, Olga	<>	Ms.
6	7621	<>	<>	100	00	<>	Breyer, Joanna	<>	Ms.
6	3761	<>	<>	250	00	<>	Carlner, Geoffrey	<>	Mr.
6	5101	<>	<>	50	00	<>	Carlson, Jr. Robert H.	<>	Mr.
6	6693	<>	<>	25	00	<>	Carter, Michael C.	<>	Mr.
6	4538	<>	<>	100	00	<>	Concilus, Robert	<>	Mr.
6	3772	<>	<>	20	00	<>	Contardo, Joseph D.	<>	Mr.
6	5289	<>	<>	50	00	<>	Cronin, Mary Jane	<>	Ms.
6	5759	<>	<>	50	00	<>	Dancis, Jerome	<>	Mr.
6	8340	<>	<>	35	00	<>	Darling, Ruth W.	<>	Ms.
6	7745	<>	<>	50	00	<>	Deakins, Jack G.	<>	Mr.
6	8980	<>	<>	50	00	<>	Deakins, Jack G.	<>	Mr.
6	5813	<>	<>	30	00	<>	Dent, Doris L.	<>	Mrs.
6	30249	<>	<>	50	00	<>	Dixon, Mead	<>	Mr.
3	630	<>	<>	20	00	<>	Doeherty, John	<>	Dr.
6	6358	<>	<>	50	00	<>	Dolan, Richard	<>	Mr.
6	3706	<>	<>	50	00	<>	Donnelly, Bernard P.	<>	Mr.
6	7925	<>	<>	50	00	<>	Duff, Arthur S.	<>	Mrs.
6	3501	<>	<>	100	00	<>	Dunn, James F.	<>	Mr.
6	8451	<>	<>	25	00	<>	Dunne, Katherine B.	<>	Ms.
6	8451	<>	<>	50	00	<>	Dusenbury, Linda A.	<>	Dr.
3	23723	<>	<>	10	00	<>	Dyas, Michael D.	<>	Mr.
1	29041	<>	<>	25	00	<>	Edelstein, Joel K.	<>	Mr.
1	7825	<>	<>	5	00	<>	Edwards, Alyce F.	<>	Ms.
6	3431	<>	<>	50	00	<>	Edwards, Mary H.	<>	Mrs.
6	4546	<>	<>	35	00	<>	Enice, Jane	<>	Mrs.
6	5762	<>	<>	10	00	<>	Fairley, Laura Mary	<>	Ms.
6	5297	<>	<>	25	00	<>	Finnerty, Eileen	<>	Ms.
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6	4671	<>	<>	100	00	<>	Frankenberg, Dick	<>	Mr.
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6	7374	<>	<>	100	00	<>	Gaines, Evelyn	<>	Mrs.
6	6393	<>	<>	25	00	<>	Getoff, Jean	<>	Dr.
6	25683	<>	<>	25	00	<>	Gilbert, Sylvia	<>	Ms.
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6	4334	<>	<>	25	00	<>	Goldberg, Carl	<>	Mr.
6	4559	<>	<>	25	00	<>	Goralak, Frank S.	<>	Mrs.
6	7125	<>	<>	25	00	<>	Graves, Barbara S.	<>	Mrs.
6	6362	<>	<>	100	00	<>	Greenwood, Joan V.	<>	Ms.
6	6362	<>	<>	50	00	<>	Grice, Paul E.	<>	Mr.
6	6362	<>	<>	50	00	<>	Gross, Susan	<>	Ms.

14062

04 04 3 9 3 1 7 9 9

POC's working
page for
List "8"

3

Mary Anne

6.	553	<>	25.00	<>	Ridgley, Robert W. ✓	<>	Mr.
6.	7597	<>	50.00	<>	Roberts, Marie M. ✓	<>	Ms.
6.	3849	<>	100.00	<>	Robinson, Jr. E. Gordon ✓	<>	Mr.
6.	8011	<>	20.00	<>	Rogers, John Clark ✓	<>	Mr.
6.	5004	<>	250.00	<>	Rosenfeld, Barbara ✓	<>	Mrs.
6.	3554	<>	300.00	<>	Rosenfeld, Jonathan ✓	<>	Mr.
6.	5774	<>	100.00	<>	Rossebo, Beatrice Jane ✓	<>	Mrs.
6.	8155	<>	50.00	<>	Russell, Patricia ✓	<>	Mrs.
6.	7854	<>	50.00	<>	Russell, Wade ✓	<>	Mr.
6.	4770	<>	50.00	<>	Rynerson, Jacqueline M. ✓	<>	Mrs.
6.	9688	<>	20.00	<>	Sablow, Mark ✓	<>	Mr.
6.	6770	<>	15.00	<>	Saffrin, Harry B. ✓	<>	Mr.
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6.	4480	<>	500.00	<>	Saunders, Louise H. ✓	<>	Ms.
6.	5744	<>	25.00	<>	Schroeder, Patrick M. ✓	<>	Mr.
6.	6704	<>	10.00	<>	Schweers, Marie ✓	<>	Mrs.
6.	4683	<>	50.00	<>	Scoble, Fran N. ✓	<>	Ms.
6.	7339	<>	10.00	<>	Scott, Julia Michael ✓	<>	Ms.
6.	4833	<>	50.00	<>	Sederstrom, Marcia L. ✓	<>	Mrs.
6.	4833	<>	100.00	<>	Sheppard, Martha P. ✓	<>	Mrs.
6.	1026	<>	20.00	<>	Sherman, James Robert ✓	<>	Mr.
6.	3701	<>	25.00	<>	Shubin, Judy ✓	<>	Ms.
6.	6114	<>	15.00	<>	Snow, Bernice ✓	<>	Ms.
6.	5171	<>	50.00	<>	Snyder, Charles R. ✓	<>	Mr.
6.	4703	<>	50.00	<>	Soyka, Peter A. ✓	<>	Mr.
2.	3032	<>	250.00	<>	Spickard, Donald E. ✓	<>	Mr.
6.	4822	<>	50.00	<>	Sprecher, Helen ✓	<>	Ms.
6.	7016	<>	20.00	<>	Stare, Jane ✓	<>	Ms.
6.	3351	<>	150.00	<>	Starkey, Lola A. ✓	<>	Ms.
6.	7337	<>	100.00	<>	Strauss, David M. ✓	<>	Mr.
6.	6463	<>	500.00	<>	Thinh, Fran Quoc ✓	<>	Mr.
6.	6630	<>	50.00	<>	Thompson, Greg ✓	<>	Mr.
6.	3886	<>	98.00	<>	Towne, Dudley H. ✓	<>	Mr.
6.	6244	<>	25.00	<>	Tuchin, William ✓	<>	Mr.
6.	7347	<>	25.00	<>	Tucker, Jeffrey P. ✓	<>	Mr.
2.	903	<>	50.00	<>	Turner, Larry ✓	<>	Mr.
6.	5866	<>	25.00	<>	Uplinger, Karen M. ✓	<>	Ms.
2.	10807	<>	30.00	<>	Vanderburgh, Nicholas E. ✓	<>	Mr.
6.	6523	<>	25.00	<>	Valkenling, Lee R. ✓	<>	Mr.
6.	6676	<>	250.00	<>	Wake, Marvilee H. ✓	<>	Mrs.
6.	7959	<>	50.00	<>	Warren, Carol Elizabeth ✓	<>	Mrs.
6.	6333	<>	50.00	<>	Wavell, Joan B. ✓	<>	Mrs.
6.	3349	<>	250.00	<>	Wechsler, Monroe S. ✓	<>	Mr.
6.	5696	<>	200.00	<>	Weisberg, Lawrence R. ✓	<>	Mr.
6.	3758	<>	50.00	<>	Weiss, Peter ✓	<>	Mr.
6.	5015	<>	50.00	<>	West, Stephen ✓	<>	Mr.
6.	5390	<>	25.00	<>	Wilkinson, Robert H. ✓	<>	Mr.
6.	6274	<>	100.00	<>	Williams, R. D. ✓	<>	Mr.
6.	8034	<>	200.00	<>	Wilson, Mary G. ✓	<>	Ms.
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6.	5269	<>	50.00	<>	Wochinger, Robert ✓	<>	Mr.
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6.	6489	<>	25.00	<>	Zamora, Florence ✓	<>	Mrs.

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22,191.00

435

22191.00

Balanced

8

POC working paper "8" for

4

2021 06 24 09 56

List 8

Missing

Eskow, Lenard

\$10.00

Hunter, M. Louise

\$25.00

4132

\$35.00

Poc working
papers for
List "8"

POC's Reconciliation
Revised List "8"
14-44

List 8 XFER 10-15-92

Page 8

UNABLE TO IDENTIFY

Eskow, Lenard	none	10.00
Hunter, M. Louis	4132	25.00

35.00

AMOUNT WITH PROBLEMS

35.00

AMOUNT ON POC COMPUTERS

22156.00

TOTAL ACCOUNTED FOR

22191.00

XFER AMOUNT

22191.00

UNACCOUNTED FOR DIFFERENCE

0.00

1st page list of "9" sent from Little Rock 14-45

TRANSFERRED

Abel	Darrel	1055 Dutch Neck	HE04572-	100.00	09/14/92
Abelson	David F.	4611 Crestwood Way	CAP5822-	100.00	09/15/92
Abreu	Kenneth E.	853 Overlook Ct.	CAR4403-	25.00	09/01/92
Abson	Lillian	817 Spring Beach Rd.	IL60013-	30.00	09/14/92
Accardi	Eleanor	35 Virginia Road	MY11791-	150.00	09/28/92
Ackerman	David M.	1216 Woodside Pkwy.	MD20910-	50.00	09/14/92
Adams	John C.	6005 Forest Ave.	MY11385-	3.00	09/30/92
Adams	Lorraine M.	13 N Monroe St.	FL34465-	25.00	09/22/92
Adams	Patricia Bryan	450 W 55th St., Apt. 5RE	NY10019-	50.00	09/23/92
Adams	Rayette B.	8123 Cabernet Ct.	CAP5135-	100.00	09/23/92
Adams	Russell Baird	9120 Harrington Drive	MD20854-	25.00	09/23/92
Adams	Virginia B.	2125 Terrace Road	KS66049-	100.00	09/08/92
Adicoff	Arnold	28251 Via Rueda	CA92675-	200.00	09/18/92
Admiral	Mary J.	40 Aspen St.	MA02402-	10.00	10/01/92
Admiral	William J.	40 Aspen St.	MA02402-	10.00	10/01/92
Ahmern	Cynthia J.	148 Dallas Dr.	KY40475-	20.00	09/14/92
Ahmern	Barbara	4811 S. Kalamath	CO80110-	25.00	09/16/92
Alton	Jane	856 Villa Gran Way	MO63026-	20.00	09/14/92
Akes	Daniel D.	32 Irving St.	MA02176-6839	100.00	08/26/92
Albano	O. M.	205 Christy Rd.	GA31410-	500.00	09/23/92
Alden	Barbara	509 Galloway Ct.	FL34788-	25.00	08/25/92
Aldridge	Charles F.	578 Winchester Rd.	AL35761-	1000.00	09/14/92
Aldridge	Judy M.	10807 W. 96th Pl.	KS66214-	50.00	09/17/92
Aldridge	Sherry K.	2112 Glenwood St.	KC28083-	25.00	09/18/92
Alexander	John R.	1719 Trosper Rd.	KC27405-	500.00	09/24/92
Alexander	Phyllis	5649 Wickersham Lane	TX77056-4030	25.00	09/24/92
Alexander	Robert S.	103 Lorraine Terrace	MD21740-	10.00	09/23/92
Allen	Dixie J.	4592 Toni Dr.	OH65418-	50.00	09/08/92
Allen	Mary Nell	719 Lincoln St.	PA18840-	250.00	09/14/92
Allen	Michael T.	2701 Riverside Dr.	FL33085-	25.00	09/14/92
Allen	Nancy	15 Stuyvesant Oval Apt 3C	NY10009-	75.00	09/18/92
Allen	Reoul	18 Monterey Drive	PA00735-	10.00	09/14/92
Allen	Tim C.	345 Cypress, Apt. 4	TX38375-	30.00	09/28/92
Allen	V. Gordon	P. O. Box 117, 35 Summer St.	MO3440-	250.00	08/25/92
Alling	Albert	5111 W. 25th Rd.	VA22207-	100.00	08/31/92
Allweiss	Michael B.	14270 Sherwood	MI68237-	25.00	09/21/92
Almeida	George A.	P.O. Box 187	MA02128-	5.00	08/27/92
Almeida	Joseph L.	73-1274 Kukuna St.	HI96740-	10.00	09/23/92
Alpert	Marc S.	141 Tremont St., Fl. 7	MA02111-	100.00	09/14/92
Alpert	Robert	816 Broadview Avenue	IL60035-	25.00	08/21/92
Altman	Tillie	365 W. 25th St.	NY10001-5803	5.00	09/23/92
Alvis	Phoebe C.	7877 Thompson Rd	OH45247-	10.00	09/11/92
Aman	J. F.	P. O. Box 471	CA94515-	25.00	09/15/92
Amandes	Joanne	3306 39th St.	TX79613-	100.00	08/27/92
Amdur	Sheila B.	150 Sawmill Brook Lane	C706250-	30.00	09/24/92
Ams	George V.	803 Box 1098	PA17044-	25.00	09/23/92
Amin	Chandrakant F.	71 Marden Lane	NY12401-	100.00	09/17/92
Amole, Jr.	Warren R.	510 - 1st Ave. N., Ste. 100	MT59401-	25.00	09/30/92
Amine	Robert	Box 87	VA98288-	10.00	09/14/92
Anderson	Allen H.	9 Summit Road	MA02173-	100.00	09/16/92
Anderson	Arnold O.	128 Diablo View Dr.	CA94563-1527	25.00	09/24/92
Anderson	Fenwick	1497 Blv. B2	CT06511-	50.00	09/18/92
Anderson	Graydon E.	22310 SW 65th Avenue	FL33428-	100.00	09/14/92
Anderson	Hazel L.	1700 Fifth Avenue	MS59601-	50.00	09/21/92
Anderson	Kelen	3030 S Santa Barbara Drive	FL33983-	100.00	09/14/92
Anderson	Herbert A.	P.O. Box 483	MD58045-	100.00	09/14/92
Anderson	J. L.	724 S. Main	KS67042-	10.00	09/14/92
Anderson	Joan B.	5422 Drovers Drive	CA92115-	75.00	08/21/92
Anderson	John R.	901 N. Monroe St.	VA22201-	50.00	09/08/92
Anderson	Joyce G.	74 Aunt Molly Rd.	NJ08525-	500.00	09/22/92
Anderson	Leoda	3105 Wheeler St.	TX78705-	20.00	09/14/92
Anderson	Mable E.	130 Nelson Rd.	AL35747-	25.00	09/30/92
Anderson	Mrs. Frank E.	1315 Terrisa Dr.	KC28214-	50.00	09/14/92
Anderson	Phyllis R.	6207 Crachie Ln.	MD20816-	250.00	08/31/92
Anderson	Virginia	3483 Monroe Ave.	CA94549-	10.00	09/23/92

10-20-92
196,646.98
BANK - X FER
10/20/92

* transferred 10-27-92 196,646.98 for "9"

"9"

14070

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LAST PAGE 1.57.92

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Witlen	Lisa	North Brunswick	25.00	09/11/92	1108902
Witmer	Wanda C.	Cheverly	10.00	09/11/92	MD20785
Witte	Wheeler J.	Wyoming	50.00	09/14/92	MI49509
Wolfe	Deborah K.	Washington	50.00	09/14/92	DC20003
Wolfe	Beatrice	San Gabriel	25.00	08/26/92	CA91775
Wolfe, Jr.	Milton K.	Toms Brook	25.00	09/16/92	VA22660
Woltersperger	Richard B.	Gulfport	100.00	09/18/92	MS39507
Wolontis	Margaret	Vineyard Haven	100.00	09/09/92	MA02568
Wood	Mary L.	Apple Springs	25.00	09/21/92	TX75926
Wood	Jackie C.	Menlo Park	100.00	09/14/92	CA94025
Woodard	Louise C.	Stewart	50.00	08/25/92	TH37175
Woods	Kent S.	Palatka	1000.00	09/24/92	FL32177
Woods	Joseph M.	Washington	100.00	09/21/92	DC20036
Woods	Mary L.	Raymond	50.00	09/11/92	ME04071
Wool	Robert	New York	250.00	09/17/92	NY10024
Wooten	Frances R.	Chester town	25.00	09/11/92	TX75230
Workman	Christopher J.	Dallas	15.00	09/21/92	TX75230
Worsham	Dan C.	Asheville	200.00	09/24/92	NC28806
Worsham	Victoria H.	Austin	25.00	09/23/92	TX78731
Wright	Jill D.	Charlottesville	20.00	08/21/92	VA22903
Wyatt	Beverly J.	Crossville	50.00	08/28/92	TN38555
Wyatt	C. D.	Memphis	300.00	10/02/92	TX38127
Yager	Carolyn D.	Warner Robins	50.00	09/15/92	GA31093
Yanagihara	Mancie A.	Honolulu	100.00	09/22/92	HI96826
Yansura	Daniel G.	Pacific	30.00	09/14/92	CA94044
Yantis	Stanley M.	San Francisco	250.00	09/16/92	CA94114
Yarbrough	Marilyn V.	Chapel Hill	100.00	09/24/92	NC27514
Yates	Joyce	Shepherd	10.00	09/17/92	TX
Yerman	Shelley J.	Washington	50.00	09/08/92	DC20010
Yo-ung	Thomas L.	Encino	10.00	09/14/92	CA91316
Young	Nancy B.	Columbus	50.00	09/17/92	OH43220
Young	Robert C.	Fairfax	50.00	08/21/92	VA22030
Zachariah	Lauree H.	Baton Rouge	100.00	08/21/92	LA70808
Zander	Florence A.	Gullford	100.00	08/21/92	CT06437
Zane	Caroline R.	Webster	100.00	09/17/92	NY14580
Zarky	Alan	Seattle	100.00	08/21/92	WA98105
Zeisel	Irma B.	Baltimore	25.00	09/17/92	MD21220
Zeko	Thomas A.	San Francisco	50.00	09/24/92	CA94117
Zeldin	Joel	Berkeley	50.00	09/17/92	CA94707
Zeltner	Hugo F.	Tempe	50.00	09/29/92	AZ85283
Zimmer	Sheryl L.	Hauwatoa	25.00	09/15/92	HI53222
Zimmerman	Deborah R.	Riverside	500.00	09/11/92	CA92506
Zimmerman	Sidney E.	New York	10.00	09/23/92	NY10011
Zipsie	Josephine H.	Baraboo	20.00	09/24/92	WI53913
Ziskind	Sylvia	Los Angeles	100.00	09/15/92	CA90010
Zisman	Alan S.	Monsey	50.00	09/15/92	NY10952
Zorice	Cindy L.	APD New York	25.00	09/23/92	NY09325
Zukoski	Joan B.	Pasadena	100.00	09/23/92	CA91107
Zupnik	Marilyn J.	Excelsior	100.00	09/22/92	MN55331
Zweig	Frances K.	Silver Spring	25.00	09/23/92	MD20906
Zwillenberg	Herman J.	New Rochelle	100.00	09/14/92	NY10804

14071

Poc's Reconciliation

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5	12929	<>9<>5956	<>30.00<>921002	<>003<>13<>F0K<>6<>	Wyatt, C. D.	<>Mr.
6	11144	<>9<>1508	<>50.00<>920915	<>014<>33<>F0K<>6<>	Wyatt, Carolyn D.	<>Mrs.
7	11837	<>9<>1670	<>100.00<>920922	<>001<>41<>F0K<>6<>	Yager, Carolynn D.	<>Ms.
8	10155	<>9<>1670	<>30.00<>920914	<>006<>40<>F0K<>6<>	Yanagihara, Mencie A.	<>Mr.
9	10221	<>9<>1722	<>250.00<>920914	<>011<>30<>F0K<>6<>	Yantis, Daniel G.	<>Dr.
10	12429	<>9<>1068	<>100.00<>920924	<>003<>21<>F0K<>6<>	Yates, Stanley M. V.	<>Mrs.
11	1370	<>9<>4320	<>10.00<>920917	<>001<>35<>F0K<>6<>	Yates, Joyce	<>Mrs.
12	6894	<>9<>2257	<>50.00<>920908	<>022<>24<>F0K<>6<>	Yerman, Shelley J.	<>Ms.
13	10325	<>9<>2284	<>10.00<>920914	<>020<>33<>F0K<>6<>	Young, Thomas Larry	<>Mr.
14	11480	<>9<>3270	<>50.00<>920917	<>015<>33<>F0K<>6<>	Young, Hancy B.	<>Mrs.
15	12456	<>9<>3363	<>50.00<>920821	<>009<>32<>F0K<>6<>	Young, Robert C.	<>Mr.
16	9682	<>9<>825	<>100.00<>920910	<>001<>37<>F0K<>6<>	Young, Leuree H.	<>Miss
17	3301	<>9<>896	<>100.00<>920821	<>015<>31<>F0K<>6<>	Zachariah, Florence A.	<>Ms.
18	12244	<>9<>772	<>100.00<>920917	<>001<>36<>F0K<>6<>	Zane, Caroline R.	<>Ms.
19	11285	<>9<>4068	<>25.00<>920917	<>001<>07<>F0K<>6<>	Zarky, Aisa	<>Mrs.
20	11734	<>9<>5201	<>50.00<>920924	<>012<>38<>F0K<>6<>	Zelso, Irma B.	<>Mrs.
21	27809	<>9<>1321	<>50.00<>920917	<>010<>38<>F0K<>6<>	Zeko, Thomas A.	<>Mr.
22	10940	<>9<>8355	<>50.00<>920929	<>018<>38<>F0K<>6<>	Zeldin, Joel	<>Mr.
23	11903	<>9<>3054	<>50.00<>920911	<>002<>02<>F0K<>6<>	Zettler, Hugo F.	<>Mrs.
24	12431	<>9<>1103	<>10.00<>920923	<>002<>33<>F0K<>6<>	Zimmerman, Deborah Rosenthal	<>Ms.
25	10811	<>9<>1290	<>20.00<>920924	<>013<>18<>F0K<>6<>	Zimmerman, Sidney E.	<>Mr.
26	11502	<>9<>488	<>100.00<>920915	<>003<>22<>F0K<>6<>	Zipsie, Josephine H.	<>Mrs.
27	12554	<>9<>1149	<>25.00<>920823	<>001<>34<>F0K<>6<>	Zipsie, Sylvia	<>Mrs.
28	12487	<>9<>4183	<>100.00<>920923	<>012<>32<>F0K<>6<>	Zisman, Alan S.	<>Dr.
29	11918	<>9<>5507	<>100.00<>920922	<>002<>37<>F0K<>6<>	Zorica, Cindy Lane	<>Mrs.
30	11918	<>9<>5507	<>125.00<>920923	<>008<>37<>F0K<>6<>	Zukoski, Joan B.	<>Mrs.
31	10567	<>9<>1393	<>100.00<>920924	<>010<>35<>F0K<>6<>	Zupnik, Marilyn J.	<>Ms.
32	12448	<>9<>3544	<>25.00<>920921	<>009<>35<>F0K<>6<>	Zwief, Frances K.	<>Mr.
33	12448	<>9<>3544	<>25.00<>920921	<>009<>12<>F0K<>6<>	Zwiefenberg, Herman J.	<>Ms.
34	12448	<>9<>3544	<>25.00<>920921	<>009<>12<>F0K<>6<>	van Empel, Cynthia H.	<>Ms.

break: 185,204.03

POC'S RECAP

14-47

LIST "9"

NSF

Penavic, Capricia M. 905 7.95

REFUNDS

Farber, Burton W.	3290	10.00	
Mroz, Winfried L.	936	25.00	
Rosenberg, Joan B.	4813	1000.00	
Turner, Mary E.	6994	+ 300.00	
			1335.00

UNABLE TO IDENTIFY

Porta, Guerino Della	312	75.00	
Taylor, Lillian M.	1591	+ 25.00	
			100.00

AMOUNT WITH PROBLEMS	1442.95
AMOUNT ON POC COMPUTER	195204.03
TOTAL ACCOUNTED FOR	196646.98
XFER AMOUNT	196646.98
UNACCOUNTED FOR DIFFERENCE	0.00

TRANSFERRED TO

SUSPENSE

Constance H.
Nate T.
Deborah R.
John P.
Victoria
Alex
Margaret G.
Cleo
Bruce
Robert
F. Michael
Patricia
Sammye J.
Virginia
Bedros C.
Jan D.
Mary-Kose
Sandra A.
George
Pamela E. W.
Georgelyne T.
Corrine E.
C. L.
John A.
Ronald L.
Terry Diane
Arthur K.
Alteir Cherron
Martha Kreimer
Grace E.
John B.
Howard S.
Judith K.
Andrea M.
G. E.
Robert
Natti
Ann R.
Helen A.
Barbara L.
Michael
Esther M.
Betty Jane
Betty J.
William E.
Peter
Mary A.
Dennis H.
Bill
Darrall G.
Rosario A.
Mrs. Z. F.
Paul M.
Oliver C.
Margaret R.
Virginia S.
Patricia Anne
Evelyn
Hong Sing
Robert J.
Stephen Y.
David M.

301 W 2nd Street Apt. 7
P. O. Box 1271
108 Fairview St.
1335 W. Fargo
6141 Leesburg Pike Apt 408
125 Lake Nancy Dr., Apt. 248
2209 Club House Dr.
2635 Tremonto
17570 St. James Rd.
43 Miller Blvd.
2708 Cedar Point Dr.
120 Eastland Ave.
393 S. Madison
210 N. West St.
2 Foxmere Drive
3241 Sacramento St.
461 W. 10th St.
11693 San Vicente Blvd., #471
822 S. Ballas Rd.
6824 N.E. 160th
525 Taylor St., Apt. A
144 Holm Rd., Sp. 42
700 Adams Dr.
1226 10th Ave W
15416 NE 15th Pl. #20
5400 Lorraine
3506 11th Ave.
2307 Barrington Dr.
4700 Melvin
P. O. Box 85
3 Mac Donald Place
2418 Hartzell St.
16 Kent St.
4891 Hart Dr.
1510 Oregon Drive
6796 1/2 Mission Gorge Rd.
74 Cambridge Lane
15 Westland St.
20 Cypress Dr.
6122 Albany
931 Euclid St.
407 Cherry St.
1326 Washville St.
15520 S. Apache Dr.
1121 West 24th St.
208 Potomac Ave.
604 S. Bellantime Rd.
801 Elesforth Ct.
2050 West 10th Ave., No. 303
806 W. Race
98-697-B Kaonchi St.
7203 Berry Oaks Dr.
26 Lee St.
Chiropractor
308 Highland Ave.
670 Case Cove Rd.
4280 Caminito Picoresco
33 Meadowview Dr.
6117 Smith Lane
2321 Coyne St.
3 Westmoreland Drive
18 Mansfield Pl.
P. O. Box 1369

From Little Rock

\$ transferred 11-5-92 40,581.30 per list "D"

14075

SA

1st page of list "D"

14-48

1	09/11/92	25.00	VA22812-	Bridgewater	1
36w	09/21/92	25.00	ME04769-	Presque Isle	36w
1046	09/01/92	25.00	GA30030-	Decatur	1046
239	09/30/92	5.00	IL60626-	Chicago	239
347	09/08/92	100.00	VA22041-	Falls Church	347
1146	09/28/92	10.00	FL33411-	West Palm Beach	1146
0147	09/16/92	100.00	AL36549-	Lillian	0147
7232	09/21/92	50.00	CA96007-	Anderson	7232
1536	09/30/92	100.00	WI53045-	Brookfield	1536
1754	09/30/92	25.00	NY11791-	Syosset	1754
1170	09/28/92	100.00	TX76710-	Waco	1170
4680	09/14/92	50.00	NY14618-	Rochester	4680
3282	09/14/92	200.00	OH44460-	Salem	3282
5474	09/24/92	20.00	I450060-	Dorydon	5474
1134	09/23/92	100.00	VA23233-	Richmond	1134
3053	09/24/92	100.00	CA94115-2047	San Francisco	3053
1836	10/02/92	25.00	PA16502-	Erie	1836
528	08/26/92	100.00	CA90049-	Los Angeles	528
600	09/28/92	25.00	MO63122-	Kirkwood	600
955	09/23/92	50.00	WA98011-	Bothell	955
1176	10/02/92	25.00	AK99508-	Anchorage	1176
2196	09/29/92	15.00	MO88201-	Roswell	2196
5802	09/17/92	200.00	WA98119-	Seattle	5802
3552	09/11/92	25.00	CA94107-	San Francisco	3552
4751	09/16/92	15.00	WA98007-	Bellevue	4751
12150	10/02/92	25.00	LA51106-	Stoux City	12150
NO	10/01/92	5.00	CA90018-	Los Angeles	NO
3363	09/25/92	50.00	OH43606-	Toledo	3363
4407	09/16/92	200.00	AK99517-	Anchorage	4407
1661	09/14/92	100.00	MO21773-	Myersville	1661
3374	09/11/92	125.00	NY10583-	Scarsdale	3374
8472	09/16/92	100.00	IL60201-	Evanston	8472
1056	09/16/92	20.00	ME04073-	Sanford	1056
706	08/21/92	25.00	CA92116-	San Diego	706
6731	09/23/92	15.00	CA95822-	3224 Sacramento	6731
2438	09/18/92	25.00	CA92120-	San Diego	2438
188	09/11/92	20.00	FL33636-	Worcester	188
6250	09/11/92	100.00	MA01602-	Worcester	6250
5085	09/23/92	50.00	KS67206-	Wichita	5085
0416	09/22/92	20.00	IL60659-	Chicago	0416
2559	09/15/92	25.00	CA90403-	Santa Monica	2559
6430	10/01/92	10.00	MT59711-	Anaconda	6430
1137	09/15/92	25.00	CA92110-4103	San Diego	1137
198	10/02/92	15.00	KS66062-	Olathe	198
8589	09/22/92	20.00	AR72206-	Little Rock	8589
2692	09/16/92	25.00	IA47803-	Terre Haute	2692
347	09/24/92	250.00	IN47401-	Bloomington	347
1295	09/17/92	100.00	MO63031-	Florissant	1295
273	09/25/92	100.00	CO80020-	Broomfield	273
412	09/16/92	50.00	DC20010-	Washington	412
269	09/09/92	500.00	AR72143-	Searcy	269
724	09/25/92	5.00	HI96701-	Aiea	724
1351	09/09/92	35.00	TX37421-	Chattanooga	1351
392	09/23/92	10.00	MA01970-	Salem	392
12509	09/28/92	50.00	KY40143-	Hardinsburg	12509
1374	09/30/92	50.00	KJ08057-	Moorestown	1374
4138	09/30/92	25.00	NC28715-	Candler	4138
1335	09/16/92	100.00	CA92108-	San Diego	1335
1517	08/28/92	1000.00	IL60093-	Northfield	1517
2393	10/01/92	25.00	AL36693-	Mobile	2393
321	09/23/92	25.00	HI96826-	Honolulu	321
7105	09/16/92	100.00	VA20165-	Sterling	7105
1651	09/21/92	50.00	NY11563-	Lymbrook	1651
3761	09/23/92	50.00	NC27402-	Greensboro	3761

LAST PAGE of
List of

300.00 09/18/92 91
100.00 09/23/92 1
10.00 09/28/92 17..
50.00 10/02/92 NO
100.00 10/01/92 1957
50.00 09/21/92 1900
10.00 09/30/92 932
100.00 10/02/92 2937
2.00 09/30/92 1241

CO80392-
MA02644-
FL33317-
MA01106-
TX75703-
MO5270-
CO80220-
NY01002-
CA90039-

Souder
South Yarmouth
Plantation
Longmeadow
Tyler
Hobartly
Denver
Amherst
Los Angeles

1228 17th Street
29 Palme Road
7500 S.W. 12th St.
112 Cooley Dr.
6004 Raleigh Dr.
720 Gratz Brown
438 Newport Street
7 Indian Pipe Lane
3334 Dover St.

Edwin L.
Vivian
Robin D.
Ruth R.
Donald V.
Orville S.
Harvin L.
William O.
Stella Anthony

Wolff
Woodworth
Yablonsky
Yarns
Yerborough
Yowell
Zelinger
Zimmer
Zvalato

14076

POC's Reconciliation

List "Ø"

Last page

14078

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6.11732	<>	0	<>	187	<>	1732	<>	11732	<>	Mr. Ronald B.
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6.11953	<>	0	<>	472	<>	953	<>	11953	<>	Mr. Conrad
6.12263	<>	0	<>	134	<>	2263	<>	12263	<>	Mrs. Elizabeth W.
6.13022	<>	0	<>	291	<>	3022	<>	13022	<>	Mr. J. Gaston B.
6.13364	<>	0	<>	720	<>	3364	<>	13364	<>	Mrs. Geraldine L.
6.12964	<>	0	<>	386	<>	2964	<>	12964	<>	Mr. Stephen S.
6.12962	<>	0	<>	415	<>	2962	<>	12962	<>	Mr. Albert
6.12597	<>	0	<>	5262	<>	2597	<>	12597	<>	Mr. Walter
6.10488	<>	0	<>	3931	<>	488	<>	10488	<>	Mrs. Teresa L.
6.10701	<>	0	<>	014	<>	701	<>	10701	<>	Ms. Christine L.
6.10701	<>	0	<>	51	<>	701	<>	10701	<>	Mr. Ellner C.
6.12552	<>	0	<>	149	<>	2552	<>	12552	<>	Mr. Edwin L.
6.15102	<>	0	<>	177	<>	5102	<>	15102	<>	Mrs. Vivian
6.15102	<>	0	<>	11	<>	5102	<>	15102	<>	Mr. Robin D.
6.13730	<>	0	<>	157	<>	730	<>	13730	<>	Mrs. Ruth E.
6.12490	<>	0	<>	190	<>	490	<>	12490	<>	Mr. Ronald V.
6.13442	<>	0	<>	92	<>	442	<>	13442	<>	Mrs. Grville B.
6.15101	<>	0	<>	177	<>	5101	<>	15101	<>	Mr. Marvin L.
6.13287	<>	0	<>	141	<>	3287	<>	13287	<>	Mr. William O.
6.13287	<>	0	<>	141	<>	3287	<>	13287	<>	Mrs. Stella Anthony

Break: 0 40,401.30

List 0 XFER 11-05-92

UNABLE TO IDENTIFY

Goldfarb, Bernard P. 3333

Page. 10

100.00

AMOUNT WITH PROBLEMS

100.00

AMOUNT ON POC COMPUTER

40481.30

TOTAL ACCOUNTED FOR

40581.30

XFER AMOUNT

40581.30

UNACCOUNTED FOR DIFFERENCE

0.00

POC's
List

14-50
"Ø"

14079

1st Page of List "A" FROM Little Rock

14-51

A

27 290.30

Total

Address	State	Zip	Amount
Bethel Park	GA	30182	1126
Los Angeles	CA	90066	100
Elizabeth	NJ	07208	427
Delta	CO	81416	442
Texas Park	MO	26912	6338
Hugs Hood	NC	27707	521
Jarussalia, Israel			8921
Cherry Dale	NC	27612	3888
Chicago	MO	26815	218
Arlington	IL	60637	2485
Blossington	WA	22286	1113
Whitinsville	IN	47401	438
Austin	TX	78759	1577
Silver Spring	MD	20983	1674
Austin	TX	78748	2463
Pembroke Pines	FL	33065	3412
Chicago	IL	60657	318
Roburn	IL	60657	4716
Washington	DC	20038	3661
Builder	CO	80394	8735
Green	PA	15333	128
Nichita	KS	67286	5114
Parkersburg	WV	26101	918
Seattle	WA	98108	3548
Roberts	WV	14226	8613
Cherry Dale	MO	26815	1217
Richville	CT	06866	4483
Neohaus	MO	62192	223
Haskell	TX	73212	1735
Dover	CO	80628	6174
Washington	DC	20069	126
New York	NY	10824	923
Pine	CA	93848	268
Wilmington	NC	28443	3629
Westboro	MA	01581	9549
Herricks	NY	11760	593
Beltsville	MD	20617	531
St. Vernon	NY	10552	4659
Gary	IN	46413	2462
Richmond	VA	23225	1448
Bozeman	MT	59717	7778
Beltsville	MD	20617	1913
El Dorado	TX	77027	5727
Sherrille	NC	28681	5324
Brassfield	MO	21639	3371
Fairfax	NC	20341	7711
San Antonio	TX	78238	10699
Richmond	VA	23227	3665
West Haven	CT	06516	1168
The Dalles	OR	97138	2712
Seattle	WA	98115	1985
Chapel Hill	NC	27516	2337
Alexandria	CA	95306	257
Merens Valley	CA	95353	633
Montgomery	CA	95148	9235
Washington	DC	20007	835

\$ transferred 1-14-92 \$27,290.30 for list "A"

Jan-14

Name	Address	City	State	Zip
S. S.	6429 Beaver Dr.	P. O. Box 861485		
Carlus J.	34 Eyre St.			
Marie A.	295 W Stafford Lane			
Stanford O.	519 Lincoln Ave.			
Artis B.	PO Box 296			
John F.	P. O. Box 154			
Sandra D.	5615 Lambshire Dr.			
Louis M.	2818 East West Hwy.			
Eugene L.	1700 E. 56th Ave.			
Walter B.	2937 S. Calabas St.			
Richard W.	2418 Cottonwood Cir.			
John E.	65 DeJear Dr.			
Mary Ann	8182-B Bonnet			
Ellen T.	18130 Armet Gardens Lane			
Susan R.	1212 Bickler Rd.			
DeJana R.	1013 SW 122nd Ave.			
Randy P.				
W. G. G.	3188 North Lake Shores Dr. #204			
Exhaml	643 Cary Drive			
Nancy Marie	1233 - 20th St., N.W.			
Arnold D.	3885 Birchwood Dr.			
Barbara L.	139 Collett Lane			
Lara C.	26 Cypress Dr.			
Kathleen R.	113 Horseshoe Circle			
Onge D.	5126 - 46th Ave., N.E.			
Bonnett N.	144 Capen Blvd.			
Onge D.	3728 Hillcrest Ln.			
John B.	96 Main St.			
Edmond L.	488 N. Charles St. #1519			
Edmond L.	531 South St.			
Edmond L.	2611 Essex Place			
Edmond L.	139 Lafayette St.			
Edmond L.	1788 R. St. #723			
Edmond L.	281 W. 89th St. #14			
Edmond L.	P.O. Box 65			
Edmond L.	1624 S. Live Oak Pkwy.			
Edmond L.	42 Adams St.			
Edmond L.	48 Buckley Hill Rd.			
Edmond L.	7318 Siboga Rd.			
Edmond L.	642 Locust St., #23			
Edmond L.	P. O. Box 2469			
Edmond L.	6327 Stuyvesant Dr.			
Edmond L.	4187 N. Lincoln			
Edmond L.	1788 Kipling Drive			
Edmond L.	P. O. Box 839			
Edmond L.	15 Edgmont Rd.			
Edmond L.	1189 easter core drive			
Edmond L.	Rt. 1, Box 1304			
Edmond L.	3018 Whisper Park			
Edmond L.	1380 Brookland Parkway			
Edmond L.	339 Blake St.			
Edmond L.	3808 N. 6th St., #6, 128			
Edmond L.	2877 N.E. 98th St.			
Edmond L.	648 Bellin Brook Farm Rd.			
Edmond L.	PO Box 2811			
Edmond L.	12825 Frederick St.			
Edmond L.	7 Sennarset Rise			
Edmond L.	1725 New Hampshire Ave., N.W. No. 487			

SA

14080

LAST PAGE OF LIST "A" FROM KITTLE ROCK

San Francisco CA 94117-1416 3532

OK Lead

Accolon	Rona	4125 Clayton St.	San Francisco	CA 94117-1416	3532
Rust	Gail B.	5543 Clarendon Avenue #2	Oakland	CA 94117	1310
Ray	Janice M.	2853 Jaisant Dr.	Reynoldsburg	OH 434	348
Sabin	Deborah A.	14 McFarfield Lane	Clifton Park	NY 12065	1885
Sahel	Dr.	789 White Past Dr.	Webster City	IA 56595	3150
Sarowitz	Daniel R.	5417 MacArthur Blvd., N.W.	Washington	20016	8794
Savon	Steve	2466 Bethany Lane	Hickley	OH 44233	1181
Schaefer	June S.	1075 Madison Ave.	Liversore	CA 94554	281
Schleuter	Judith D.	19136 Mallicoeb	Detroit	MI 48235	291
Schreiber	Judith	5117-14 14th Ave.	Brooklyn	NY 11219	5345
Shaw	William	774-Arroyo No. 70K	Los Altos	CA 94024	1864
Shear	Claudia	2178 E. Birch	Bollinghous	WA 98228	3681
Sheehan	Ronald W.	1428 N. Atlantic Ave. #1181	Daytona Beach	FL 32118	1431
Shepton	Katherine M.	1325 Ornday	Berkeley	CA 94702-1123	3117
Slaughter	Iroy E.	385 Isaacks	Yuabile	TX 77239	925
Solomon	Herschel H.	1977 Eddy St.	San Francisco	CA 94115	759
Spallien	Margaret	2527 Grand	Granite	IL 62840-4824	3294
Standing	Jerrold L.	7485 Deville Ct.	Anasdale	VA 22083	1617
Stark, Jr.	Gerald	100 Rhode Island Ave.	Middletown	RI 02840	533
Steele	J. Douglas	2836 Beauville Rd.	Richmond	VA 23235	2451
Stewart	Cynthia J.	1229 N.E. 68th	Seattle	WA 98115	4169
Stiffler	Jerrold R.	213 Old Lynchburg Rd.	Warren	OH 44313	3618
Storers	Elinore M.	2612 Burlington Rd.	Sycamore	IL 68178	1922
Sullivan	Peggy	1588 Nimitz Ct	Tucson	AZ 85718	8184
Sugget	Deborah	6828 N. Casino Dr Santa Valera	San Diego	CA 92119	1332
Swair	Elizabeth R.	7747 Blue Lobs Dr.	Seattle	WA 98108	1633
Teoh	Susan	1746 S. Ferdinand	Highland Park	NJ 08994	874
Talbot	Susan Kilkikelly	3 Forrest Glen	Pine Bluff	AR 71683	769
Talve	Cheryl D.	3205 Allister	Davis	CA 95618	382
Taylor	Jesse W.	139 Fiesta Ave.	Sussexville	GA 30747	9527
Tobert	Ovella	12 Pink Dogwood Ln.	Grand Rapids	MI 49501	654
Torres	Angelo B.	7906 Saffren St.	Anahis Hills	CA 92006	152
Trape	Victoria Triere	1489 S.W. 11th Terrace, #2	Miami	FL 33135	8184
Trapido	Jean R. L.	1100 E. Harrison St. #302	Scottie	WA 98081	4899
Trichey	Harry R.	1315 Kolb Drive	Jefferson City	MO 65101	1248
Troupe	Marilyn Kay	482 S. Spring St.	Stillwater	OK 74075	2391
Turner	Lee	229 N. Knobloch, No. 233	Keeneboro	MS 39367	3815
Vallandingham	Phillip J.	122 Wood Leand Way	Huntington	WA 23765	1903
Walden	Judith L.	4521 Kevk Trail	Ojople	VA 98081	3571
Waldie	Jeffrey	3228 Fielding Pl.	Piacerville	CA 95667	487
Ward	Herald Dean	310 Legrande	Greenboro	NC 27405	112
Wernicke, Jr.	Bob L.	28815 Susait	Astia	TX 78794	464
Warren, Jr.	Lance W.	6325 Trail Lake	Kovi	MI 48377	7424
Weaver	Susan	521 Fern Pl., N. W.	Fort Worth	TX 76133	644
Weber	Tespa R.	25465 Otislock Dr.	Washington	DC 20012	1458
Wennerhels	Rory Eern	4428 - 49th Street NW	Ceresel	CA 93923	2456
Wheeler	Ralph E.	3345 Millshire Blvd., Ste. 215	Washington	DC 20016	783
Wiggin	Linda J.	6535 Oxford Ave. SE	Los Angeles	CA 90018	10882
Williams	Linda J.	3416 N. 29th St.	Lacey	WA 98503	5124
Willis	Greer C.	615 Seamer Park Dr.	Philadelphia	PA 19148	677
Winey	John D.	3316 N 91st Crest	Bartlesville	OK 74868	2457
Winters	Barbara D.	433 W. State St., S-1H	Tucson	AZ 85745	6575
Wishart	Lelia T.	981 Teas Cp.	Trenton	NJ 08618	184
Woodruff	William H.	186 Virginia Terrace	Los Alamos	NM 87544	1462
Woolsey	Harrist R.	144 Drakes Corner Rd.	Madison	WI 53705	6812
Wong	Dennis H.		Princeton	NJ 08540	8243

1408

1408
1408

PC's Reconciliation

List "A"

Page one

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14082



Pac's Reconciliation

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POC's recap
List "A" Page 11 14-53

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Merchant, Larry	639	250.00	
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UNABLE TO IDENTIFY

Berliner, Susan R.	3412		35.00
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AMOUNT ON POC COMPUTER		25755.39
TOTAL ACCOUNTED FOR		27040.39
XFER AMOUNT		27290.30
UNACCOUNTED FOR DIFFERENCE		249.91

1st Page

List "B" from Little Rock

New B

Transferred 2-2-93 \$336,904.37 per "B"

Adams	Lobby A.	3116 Suezette Drive	1818-27 Front Street	REAR PORCH	WA 28444	1132	25.00	19920807
Adams	Evelyn				NY 11554	4270	25.00	19920814
Adams	Staidon	200 South Wacker Drive	REAR PORCH		NY 11021	4942	10.00	19920811
Abbott	Fary M.	4504 Marjory Boulevard	Apartment 402		MO 64111	2344	25.00	19920806
Abbott	Daphne Smith	140 Pleasant Street			MA 02139	3849	50.00	19920810
Abbott	John B.	225 East Street Drive		Apartment 405	CA 94080	6794	20.00	19920817
Abbott	William K.	575 Memorial Drive			MA 02138	6138	50.00	19920809
Abbott	Patricia	5107 Sherman Street			CA 91423	2449	25.00	19920813
Abbott	Carly	13551 NE 42nd			WA 98003	4884	100.00	19920807
Abbott	Margery J.	6545 Mulberry Drive			CA 92837	8462	50.00	19920814
Abbott	Carlynn	1 County Plaza			WA 98125	1078	10.00	19920817
Abbott	David	527 West 2nd St			MT 59201	8516	100.00	19920818
Abbott	Jason	615 Wood Street			CA 91711	5225	20.00	19920807
Abbott	Lee	117 E. 5th St. Apt. 201, N. H.			DC 20018	6122	50.00	19920814
Abbott	Morris	1716 East 2nd St. Apt. 402			MT 59201	741	20.00	19920817
Abbott	Bruce R.	1548 3rd Street	Suite 207		CA 92101	1306	15.00	19920806
Abbott	Christine	Box 359			MA 02035	2568	100.00	19920817
Abbott	John T.	4000 West 2nd Street			NY 10019	2128	20.00	19920817
Abbott	Robert	465 Madison Street			CT 06754	2212	50.00	19920814
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Abbott	Scott	1628 Oak Grove Avenue			IL 60716	1159	100.00	19920817
Abbott	Edward E.	30445 Chestnut Road Northwest			GA 30328	5538	10.00	19920818
Abbott	William E.	5212 Maple Drive			CA 95728	3553	25.00	19920817
Abbott	Henry L.	10055 E. 1st St. Apt. 202			IL 60622	788	50.00	19920817
Abbott	Robert K.	Clinton Park			CA 90284	5759	50.00	19920814
Abbott	Robert E.	247 5th Street			NY 10948	2540	25.00	19920818
Abbott	Irving Paul	1904 North Elmwood Street			IL 60622	5248	20.00	19920807
Abbott	Faye	318 28th Street			CA 90027	3145	25.00	19920818
Abbott	Joseph E.	1540 North Elmwood Street			CA 90482	4411	50.00	19920818
Abbott	Ann K.	7255 East Broadway	Apartment 222		IL 60622	422	25.00	19920817
Abbott	George K.	3455 East Street			RI 02902	134	10.00	19920817
Abbott	Christ L.	2182 Chestnut Street Apt. 211			TX 75242	2152	25.00	19920818
Abbott	Fary Ann	2789 Eve Creste Ct			WA 98021	1813	20.00	19920807
Abbott	Robert A.	222 Thurston Street			CA 91722	455	100.00	19920817
Abbott	Robert A.	1215 Westwood Park			NY 10912	504	50.00	19920807
Abbott	Elizabeth	1628 North Elmwood Street			VA 22801	6211	10.00	19920807
Abbott	John K.	6316 Old Chestnut Street			CO 80907	2457	50.00	19920817
Abbott	David M.	245 B 4th Avenue			NE 68527	2354	25.00	19920818
Abbott	John	2340 Westwood Park			VA 22101	113	75.00	19920818
Abbott	Laura	26 Kenneth Court			CA 90091	3455	10.00	19920812
Abbott	Patricia B.	4123 Ellington Road	Apartment 29		CA 94722	131	20.00	19920818
Abbott	John	101 Spring Street Street			IL 60622	1157	25.00	19920807
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Abbott	John	27 West Street, Apt. 6			MA 02118	2732	25.00	19920817
Abbott	Louis T.	1411 Lehigh Drive			IL 60621	425	100.00	19920817
Abbott	Larry R.	1350 Lehigh Drive			NE 68503	2197	25.00	19920813
Abbott	Art	10706 W 101st Ave			CA 94708	1277	25.00	19920812

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Zeller	James F.	323 Flynn Jens Court	MI 48205	242	25.00	19920817
Zehary	Talia	1632 Perry Street	MS 39203-	3874	30.00	19920811
Zepson	Juan E.	4348 Parkdale Avenue	NV 89121-	5331	50.00	19920814
Zevonin	Marsha R.	345 South Cochran Avenue	CA 90036-	932	50.00	19920811
Zwanziger	Frances N.	3936 Milan Street	CA 92107-	3591	25.00	19920813
Zwifsch	Beatrice	8011 Nottingham Place	CA 92837-	2735	25.00	19920810
Zwang	Nancy R.	125 East 64	NY 10026-	731	125.00	19920811
Zwinnig	Frances A.	3909 Connecticut Avenue	DC 20008-	2626	100.00	19920807
Zworsing	Ingrid	1450 Stanley Dollar Drive AB	CA 94555-	2950	100.00	19921006
Dr La Guardia	Cynthia	P. O. Box 37581	DC 20017-	1237	100.00	19920812
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POC's Reconciliation List "B"

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Kroener, Frederick J.	8043	5.00
Pecevich, Peter Paul	269	5.00
Pressler, Bruce	1179	10.00
Reber, James P.	3979	50.00
Winter, Robert J.	3164	50.00

1084

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Burke, Edward L.	1193	100.00
Conkie, Robert O.	115	5.00
Edelman, Mark	2768	70.00
Green, Gene	2710	100.00
Kliger, Jan Ellen	2733	100.00
McClellan, Joy	3741	10.00
Minter, Caroline S.	1951	50.00
Mulliner, Maurine	278	50.00
Neary, Sophia M.	5798	50.00
Nieto, Pedro G.	222	25.00
Stapp, Catherine J.	2378	10.00
Sullivan, Jeannette	322	250.00
Varky, George	1907	25.00
Williams, Elva	3436	100.00
Winkler, Iva Dean	6073	125.00

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Bostdorff, Denise	2644	10.00	list 3
Bratton, A. G.	2740	20.00	list 3
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Brody, Gene	565	80.00	list 3
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Adelson, Lester	183	5.00	list 3
Allen, Nancy P.	6156	30.00	list 3
Anderson, Frances V.	3664	20.00	list 3
Anderson, Robert	3673	30.00	list 3
Anderson, Robert M.	1662	100.00	list 3
Asrael, Gerson	1429	100.00	list 3
Atenico, Gilbert	3449	30.00	list 3
Bernier, Steven T.	239	40.00	list 5
Bruce, Melba L.	3412	10.00	list 5
Callinan, Mary L.	1223	25.00	list 3
Chattel, Robert Jay	7601	100.00	list 3
Clouse, Marjorie T.	5412	100.00	list 3
Conrad, Jack R.	3931	100.00	list 3
Cook, Robert C.	2030	10.00	list 5
Coopersmith, Martin	4310	50.00	list 3

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List B (continued)
ON OTHER LIST (continued)

Leung

284

Cronan, John F.	366	30.00	list 3
Cronin, Michael J.	3273	25.00	list 3
Currin, Stella J.	1776	100.00	list 3
Daniel, Alvin A.	1242	10.00	list 3
Dasenbrock, Marcella	6358	10.00	list 3
Davis, Jacqueline K.	7800	25.00	list 3
De Chazal, Eva M.	1765	100.00	list 3
DeWitt, Marilyn C.	4260	100.00	list 3
Diamond, Renee	5312	100.00	list 3
Donecker, John J.	1843	10.00	list 5
Dugan, Carol	102	50.00	list 5
Dull, Maxine Alice	2538	50.00	list 3
Emu, Rangaswamy	925	10.00	list D
Evans, Natalie Scott	4862	50.00	list 3
Fahrner, Alvin A.	1090	30.00	list 3
Feldman, Marilyn	1136	25.00	list 5
Finkbeiner, Richard	2472	25.00	list 3
Fischer, Mildred H.	0198	50.00	list 3
Fitz, Ben V.	3502	50.00	list 3
Fleming, Jimmie S.	6732	50.00	list 3
Freed, Bert	3861	50.00	list 3
Fremont, Alfred	1093	15.00	list 3
Fruin, Roger	5505	100.00	list 3
Froehlich, Margaret C.	1532	30.00	list 3
Garfield, Morton M.	442	100.00	list 3
Glant, Tishelle H.	5678	25.00	list 3
Godofshy, Martin R.	161	15.00	list 3
Goodlad, John I.	841	100.00	list 3
Goren, Carolyn	560	25.00	list 3
Grunewald, Raymond B.	4262	100.00	list 3
Gundran, Fred	6559	20.00	list 3
Hammer, Hoby	296	100.00	list 3
Hand, Bethlyn	492	100.00	list 3
Harpham, Orval Z.	279	10.00	list 3
Helgerson, Richard	400	100.00	list 3
Henry, Simon P.	2447	25.00	list 3
Hess, Ilse J.	0716	100.00	list 3
Hoberman, Henry D.	2918	100.00	list 3
Horowitz, Emanuel	2252	15.00	list 3
Horowitz, Estelle P.	4150	5.00	list 3
Horowitz, Esther	1657	25.00	list 6
Hymanson, Marsha	118	100.00	list 3
Hunt, Don W.	2576	25.00	list 3
Ireland, Blanche A.	3139	50.00	list 3
Jarnot, Jerry E.	747	15.00	list 3
Johnson, Jane L.	389	50.00	list 6
Jones, Judith W.	6288	10.00	list 5
Jund, Lois M.	2856	50.00	list 5
Kasten, Sylvia	809	30.00	list 3
Kline, Emanuel	118	25.00	list 3
Koenig, Earl T.	621	10.00	list 3
Kracke, Frederick C.	104	100.00	list 3
Lamb, Eleanor H.	0928	100.00	list 3
Lapointe, Francis C.	5894	60.00	list 3
Latta, Harrison	1665	100.00	list 3
Legette, Caroline Lee	363	100.00	list 3
Lehn, Carla Campbell	5880	100.00	list D
Leighton, Gertrude C.	2289	100.00	list 3
Lemucchi, Timothy	4384	100.00	list 3
Levy, Sharon	3731	100.00	list 3
Lichtenwald, Daniel H.	0761	50.00	list 5
Lukens, Miriam H.	1108	20.00	list 3

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Recap

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List B (continued)
ON OTHER LIST (continued)

Lundquist, Richard E.	2416	10.00	list 3
MacRae, Edith K.	3652	30.00	list 3
Madsen, Blaine M.	1421	5.00	list 3
Magee, Andrew D.	0890	75.00	list 3
Manus, Kathryn Blecha	2961	100.00	list 3
Margolin, Jed	1155	100.00	list 3
Matlock, Raymond	2193	100.00	list 3
McGinnis, Beatrice B.	400	35.00	list 3
Kreczmer, Dian	697	30.00	list 3
McManus, B. J.	4263	10.00	list 3
Michaelson, Samuel J.	1129	25.00	list 3
Mill, Ian D.	7161	20.00	list 5
Missel, Jerome H.	1093	150.00	list 3
Nelter, Bernice	706	10.00	list 3
Norman, Harold	6757	20.00	list 3
Osborne, Anna G.	230	25.00	list 3
Paymer, Leonard	8125	5.00	list 3
Peters, Lesile Jean	4417	50.00	list 3
Peterson, Violet V.	1648	30.00	list 3
Pinsky, Helen M.	537	25.00	list 3
Pomajevich, Mathew	4272	30.00	list 3
Pope, Betty L.	2030	10.00	list 3
Porter, Doris	8460	5.00	list 6
Putnam, Scott	9061	100.00	list 3
Ramsden, Dorothy G.	2066	100.00	list 3
Reinsmith, David W.	443	10.00	list 5
Reuter, Clifford S.	4472	100.00	list 3
Riley, Wayne	141	30.00	list 3
Rinefierd, Karen M.	4524	25.00	list 3
Rohssler, Elliot	622	10.00	list 3
Rose, Judith	2808	100.00	list 3
Ross, Judith D.	1780	100.00	list 3
Salem, Murray William	135	50.00	list 6
Saltel, Pauline	4414	100.00	list 5
Sand, Fred W.	368	20.00	list 3
Scheindlin, Shira A.	3163	100.00	list 3
Schmoll, Maxine B.	5718	50.00	list 3
Schreiber, Murray	200	100.00	list 5
Seeley, Williams	6125	100.00	list 3
Sheets, Dolores	556	50.00	list 5
Smith, Chester A.	6137	10.00	list 3
Snider, Randolph E.	3173	100.00	list 3
Snyder, Hilda	1253	10.00	list 3
Stiegler, Dorothy E.	2150	15.00	list 3
Hollis, Ken	3221	100.00	list 3
Stites, M. Cynara	3899	50.00	list 3
Tipperman, Mark	2325	30.00	list 3
Tool, Marc R.	0910	100.00	list 3
Turner, Sylvania W.	1430	30.00	list 6
Tyre, Billy J.	759	100.00	list 3
Vetrocq, Marcia E.	1410	25.00	list 3
Vetter, E. R.	5331	25.00	list 3
Vogt, Juana Allraus	9346	100.00	list 3
Wadsworth, Sara A.	5362	100.00	list 3
Wakefield, Lawrence P.	0128	15.00	list 3
Walker, Turnley	2645	100.00	list 3
Walsh, Thomas C.	4103	75.00	list 3
Ward, Jo Ann S.	5673	35.00	list 5

List B (continued)
ON OTHER LIST (continued)

Receipt

484

Weaver, James H.	1090	45.00	list 3
White, Emile J.	Cash	1.00	list D
Williams, J. Byron	3527	10.00	list 3
Williams, N. Sandra	2093	10.00	list 3
Wilson, J. O.	2361	10.00	list 3
Wilson, Doris	1486	10.00	list 3
Wiskautan, Jeny	455	100.00	list 3
Wolfe, Constance	2137	15.00	list 6
Wood, John B.	3441	100.00	list 3
Zucherman, Victor	4965	10.00	list 3
Zwerling, Ingrid	3860	100.00	list 3
Buchanan, James O.	5277	100.00	list 3
Richardson, Kristen L.		5.00	list 1
Taylor, Grace C.	5581	20.00	list 3
Thompson, Margaret S.	1946	100.00	list 3
Timmerman, Anne N.	5350	30.00	list 3
Thorgrimson, Preston	82803	500.00	law firm general account

8701.00

UNABLE TO IDENTIFY

Goren, Carolyn	8017	25.00
Rowe, Charles H.	1906	10.00

35.00

AMOUNT WITH PROBLEMS	10036.00
AMOUNT ON POC COMPUTER	326518.37
TOTAL ACCOUNTED FOR	336554.37
XFER AMOUNT	336904.37
UNACCOUNTED FOR DIFFERENCE	350.00

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LAST PAGE
List "C"

MD 58689-9532	5283	5
LA 76117-	238	20
LA 90086-	6620	50
CO 86184-	3484	100
WA 82174-	634	50
OR 82863-	3548	25
IA 51537-	3216	10
OH 43781-5218	1882	100
MO 21844-	3997	25
MO 63125-4535	1884	1
MI 44889-	8556	100

Edward	R. R. 1, Box 387	203 Perry-3
Donald R.	2616 Royal St.	
Rebecca H.	6242 122nd Ave. SE	
Edwin T.	363 Sunnyside Lane	
Geraldine H.	72 Everett St.	
Cindy Lane	14-C 21st Terrace Unit 23	
LeVerna	1619 Baldwin St.	
David F.	539 Brighton Blvd.	
Kerry Jo	18318 Doyler Ct.	
Barbara J.	3617 Leary Ferry Rd. 8287	
Milton Y.	308 Park St. 9285	

DMC

Zetecha		
Ziegenfelder		
Ziegrman		
Ziun, Jr.		
Zipser		
Zerica		
Zess		
Zulandt		
Zelle		
Zemall		
Zessum		

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Pac's Reconciliation

List "C"

Page one

3	17194	<<C>>1294	<<007>>01<>0K <>G>>Abercrombie, Margaret S.	<<Mrs.
6	17764	<<C>>1294	<<007>>01<>0K <>G>>Abercrombie, Stanley A.	<<Mr.
6	20044	<<C>>1086	<<014>>02<>FDK <>G>>Abernathy, Ann M.	<<Mrs.
3	18936	<<C>>2068	<<008>>01<>FDK <>G>>Abramham, Irwin	<<Mr.
1	15434	<<C>>C3794	<<007>>01<>FDK <>G>>Abramsohn, Seymour	<<Mr.
6	19432	<<C>>1252	<<001>>01<>FDK <>G>>Aceto, Nicholas C.	<<Mr.
4	15511	<<C>>12306	<<002>>01<>FDK <>G>>Ackerman, Irving B.	<<Mr.
6	18756	<<C>>474	<<017>>01<>FDK <>G>>Ackley, Eleanor R.	<<Mrs.
1	836	<<C>>2183	<<004>>01<>FDK <>G>>Adamovich, George	<<Mr.
6	19193	<<C>>4262	<<002>>05<>FDK <>G>>Adams, Margaret	<<Mrs.
6	19713	<<C>>1149	<<002>>06<>FDK <>G>>Adams, Marian L.	<<Mr.
6	19294	<<C>>1764	<<002>>01<>FDK <>G>>Adelson, Marvin	<<Mr.
6	16155	<<C>>309	<<014>>01<>FDK <>G>>Adelson, Rachel K.	<<Mrs.
6	17522	<<C>>4633	<<006>>01<>FDK <>G>>Adelstein, Stanley I.	<<Mr.
6	20085	<<C>>1756	<<001>>01<>FDK <>G>>Adelin, Michael	<<Mr.
6	19118	<<C>>2475	<<005>>01<>FDK <>G>>Adelman, Avri	<<Mr.
6	19184	<<C>>326	<<004>>01<>FDK <>G>>Adler, Betsy Buchalter	<<Mrs.
0	17011	<<C>>7120	<<001>>01<>FDK <>G>>Adler, Ivan F.	<<Mr.
2	17193	<<C>>0479	<<007>>01<>FDK <>G>>Agcaull, Richard A.	<<Mr.
6	4232	<<C>>5617	<<007>>01<>FDK <>G>>Aggular, Augustine H.	<<Mr.
6	15772	<<C>>0657	<<008>>03<>FDK <>G>>Agular, Richard P.	<<Mr.
2	18775	<<C>>4653	<<007>>02<>FDK <>G>>Ailior, Louise H.	<<Mrs.
2	19892	<<C>>3250	<<013>>01<>FDK <>G>>Albanese, John	<<Mr.
6	18453	<<C>>4083	<<010>>01<>FDK <>G>>Albert, Abigail L.	<<Mrs.
0	24336	<<C>>2142	<<004>>01<>FDK <>G>>Albert, Claudia	<<Mrs.
3	18988	<<C>>5902	<<009>>01<>FDK <>G>>Albright, III, Spencer D.	<<Mr.
6	18085	<<C>>5062	<<008>>02<>FDK <>G>>Alexander, Larry	<<Mr.
6	18406	<<C>>1775	<<004>>02<>FDK <>G>>Alexander, Larry Emmel	<<Mrs.
6	17114	<<C>>3504	<<002>>03<>FDK <>G>>Alexander, Margot	<<Dr.
6	17096	<<C>>1188	<<010>>02<>FDK <>G>>Alexander, Melvin J.	<<Mrs.
6	20043	<<C>>3010	<<002>>01<>FDK <>G>>Alfonso-Martinez, Aida	<<Mrs.
1	15268	<<C>>2526	<<002>>01<>FDK <>G>>Allen, Frank J.	<<Mr.
1	24188	<<C>>1526	<<014>>01<>FDK <>G>>Allen, Milton	<<Mr.
6	18002	<<C>>3349	<<004>>02<>FDK <>G>>Allinger, Vivian M.	<<Mrs.
2	21335	<<C>>1378	<<001>>01<>FDK <>G>>Allison, Elizabeth H.	<<Mrs.
6	18888	<<C>>1378	<<001>>01<>FDK <>G>>Allman, William B.	<<Mr.
6	18991	<<C>>1490	<<012>>02<>FDK <>G>>Altman, Rose	<<Mrs.
6	20097	<<C>>0866	<<010>>01<>FDK <>G>>Amburn, Edmond S.	<<Mr.
6	19446	<<C>>1110	<<001>>01<>FDK <>G>>Amman, Arthur J.	<<Mr.
2	12337	<<C>>2712	<<006>>01<>FDK <>G>>Ammons, James A.	<<Mr.
2	30111	<<C>>4328	<<016>>01<>FDK <>G>>Amsterdam, Marcia	<<Mrs.
6	19114	<<C>>4285	<<006>>01<>FDK <>G>>Anderson, Dorothy E.	<<Miss
6	20099	<<C>>0862	<<007>>02<>FDK <>G>>Anderson, Harold Milton	<<Mrs.
6	12551	<<C>>1076	<<002>>02<>FDK <>G>>Anderson, Jane P.	<<Mrs.
6	20883	<<C>>3089	<<011>>01<>FDK <>G>>Anderson, K. L.	<<Mrs.
3	12337	<<C>>1057	<<002>>01<>FDK <>G>>Anderson, Linda S.	<<Mrs.
6	14795	<<C>>1128	<<004>>01<>FDK <>G>>Anderson, Sven H.	<<Mr.
4	24110	<<C>>1668	<<010>>02<>FDK <>G>>Andeaway, Omer V.	<<Mr.
6	20092	<<C>>32794	<<004>>06<>OXR <>G>>Andrew, Margaret	<<Mrs.
6	19921	<<C>>3794	<<003>>01<>FDK <>G>>Andrew, Jonathan R.	<<Mr.
6	19224	<<C>>3001	<<003>>35<>FDK <>G>>Andrew, Jessica L.	<<Mrs.
6	17511	<<C>>578	<<004>>02<>FDK <>G>>Anspach, Susan E.	<<Mrs.
6	20309	<<C>>375	<<008>>06<>FDK <>G>>Archer-Gift, Cynthia	<<Mrs.
6	18079	<<C>>1621	<<012>>01<>FDK <>G>>Arllinghaus, Jr., F. H.	<<Mr.
5	9474	<<C>>214	<<005>>03<>FDK <>G>>Armato, Peter	<<Mrs.
6	2331	<<C>>5662	<<007>>02<>FDK <>G>>Armstrong, Laura Mae	<<Mrs.
6	16118	<<C>>3042	<<003>>02<>FDK <>G>>Arns, David	<<Mrs.
6	19332	<<C>>495	<<001>>01<>FDK <>G>>Artale, Jack	<<Mr.
6	20356	<<C>>252	<<002>>02<>FDK <>G>>Artist, Robert I.	<<Mr.
1	16259	<<C>>1132	<<013>>02<>FDK <>G>>Ashe, Arthur R.	<<Mr.
6	19154	<<C>>1357	<<018>>02<>FDK <>G>>Aulinskas, Tia	<<Mr.
6	16163	<<C>>1208	<<006>>01<>FDK <>G>>Austin, D. Andrew	<<Mr.
6	16163	<<C>>1208	<<002>>02<>FDK <>G>>Avent, Katie	<<Mrs.
6	16163	<<C>>1208	<<010>>02<>FDK <>G>>Aviles, Juan Carlos	<<Mr.
6	16163	<<C>>1208	<<016>>01<>FDK <>G>>Aydelot, A. L.	<<Mr.
6	16163	<<C>>1208	<<015>>01<>FDK <>G>>Aynardi, David	<<Mr.

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POC's Rec List "C"

LAST PAGE

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17747	<<C>>264	<<100.00>>921027	<<005>>38<<F>>DK<>G<>Wise, William W.	<>Mrs.
2	<<C>>690	<<100.00>>921102	<<007>>02<<F>>DK<>G<>Wiser, Ralph L.	<>Mr.
4	<<C>>1008	<<500.00>>921028	<<009>>39<<F>>DK<>G<>Witkin, William I.	<>Mrs.
6	<<C>>4272	<<25.00>>921102	<<001>>40<<F>>DK<>G<>Witt, Margaret K.	<>Mrs.
4	<<C>>4569	<<25.00>>921026	<<006>>26<<F>>DK<>G<>Wittener, Barbara	<>Mrs.
6	<<C>>5051	<<100.00>>921102	<<009>>40<<F>>DK<>G<>Witzum, Joseph J.	<>Mr.
6	<<C>>0975	<<200.00>>921110	<<003>>39<<F>>DK<>G<>Wohlfel, James C.	<>Mr.
6	<<C>>479	<<7.00>>921023	<<006>>39<<F>>DK<>G<>Wolf, Alene	<>Mrs.
6	<<C>>985	<<25.00>>921027	<<020>>40<<F>>DK<>G<>Wolfe, Charles W.	<>Mr.
6	<<C>>0614	<<19.00>>921027	<<018>>38<<F>>DK<>G<>Wolfe, Donald J.	<>Mr.
6	<<C>>518	<<50.00>>921028	<<008>>04<<F>>DK<>G<>Wolfe, Eve J.	<>Mrs.
6	<<C>>3949	<<58.00>>921112	<<008>>24<<F>>DK<>G<>Wolfe, Linda K.	<>Mrs.
6	<<C>>6828	<<25.00>>921026	<<009>>40<<F>>DK<>G<>Woolford, Leon C.	<>Mr.
6	<<C>>1739	<<50.00>>921102	<<004>>33<<F>>DK<>G<>Wood, Billie A.	<>Mrs.
6	<<C>>1878	<<10.00>>921029	<<009>>42<<F>>DK<>G<>Wood, Charles D.	<>Mr.
6	<<C>>6469	<<100.00>>921030	<<003>>35<<F>>DK<>G<>Wood, James S.	<>Mr.
6	<<C>>1516	<<15.00>>921102	<<004>>35<<D>>NS<>G<>Wood, Lucille M.	<>Mrs.
6	<<C>>125	<<150.00>>921109	<<007>>38<<F>>DK<>G<>Woodall, Joseph W.	<>Mr.
6	<<C>>223	<<20.00>>921109	<<007>>38<<F>>DK<>G<>Woods, Margaret	<>Mrs.
6	<<C>>2715	<<25.00>>921027	<<001>>35<<F>>DK<>G<>Woolfidge, Marty	<>Mr.
2	<<C>>4582	<<100.00>>921106	<<008>>38<<F>>DK<>G<>Woolford, Dorothy	<>Mrs.
6	<<C>>1577	<<5.00>>921027	<<003>>39<<F>>DK<>G<>Wooten, Ruth B.	<>Mrs.
6	<<C>>6633	<<25.00>>921102	<<015>>40<<F>>DK<>G<>Worcester, Ann Olson	<>Mrs.
6	<<C>>3737	<<50.00>>921105	<<007>>09<<F>>DK<>G<>Workman, Michael T.	<>Mr.
6	<<C>>8879	<<100.00>>921019	<<016>>39<<F>>DK<>G<>Worthington, Maryane D.	<>Mrs.
6	<<C>>3319	<<25.00>>921023	<<008>>40<<F>>DK<>G<>Wright, James	<>Mr.
6	<<C>>0826	<<50.00>>921027	<<005>>40<<F>>DK<>G<>Wright, James Lee	<>Mr.
6	<<C>>1425	<<15.00>>921026	<<010>>38<<F>>DK<>G<>Wright, Lloyd A.	<>Mr.
6	<<C>>1417	<<300.00>>921006	<<002>>27<<F>>DK<>G<>Wright, Max L.	<>Mr.
6	<<C>>527	<<50.00>>921026	<<010>>39<<F>>DK<>G<>Wright, Sr., Thomas C.	<>Mr.
6	<<C>>1267	<<25.00>>921105	<<009>>06<<F>>DK<>G<>Yardum, Richard T.	<>Mr.
6	<<C>>598	<<25.00>>921030	<<007>>39<<F>>DK<>G<>Yaroch, Betty G.	<>Mrs.
4	<<C>>3464	<<50.00>>921119	<<007>>39<<F>>DK<>G<>Yarvitz, Samuel	<>Mr.
6	<<C>>1428	<<35.00>>921027	<<011>>39<<F>>DK<>G<>Yasuna, Mildred L.	<>Mrs.
5	<<C>>7194	<<20.00>>921106	<<006>>40<<F>>DK<>G<>Yedowitz, Anne Marie	<>Mrs.
6	<<C>>6587	<<50.00>>921112	<<009>>41<<F>>DK<>G<>Yergin, Edna	<>Miss
6	<<C>>1141	<<50.00>>921029	<<002>>32<<F>>DK<>G<>Ylesley, Joel H.	<>Mrs.
6	<<C>>1504	<<100.00>>921104	<<003>>44<<F>>DK<>G<>Yllo, Kerati	<>Mrs.
6	<<C>>6845	<<11.00>>921117	<<001>>15<<F>>DK<>G<>Yonka, Walter W.	<>Mr.
6	<<C>>0392	<<5.00>>921106	<<008>>39<<D>>NS<>G<>Yonofsky, Abraham	<>Mr.
2	<<C>>0171	<<20.00>>921112	<<004>>28<<F>>DK<>G<>Young, Carl	<>Mrs.
6	<<C>>5203	<<25.00>>921027	<<018>>40<<F>>DK<>G<>Young, Gertrude A.	<>Mrs.
6	<<C>>4664	<<25.00>>921028	<<003>>43<<F>>DK<>G<>Young, Jeanne	<>Mrs.
6	<<C>>17150	<<10.00>>921029	<<016>>21<<F>>DK<>G<>Zachar, Peter J.	<>Mrs.
6	<<C>>2300	<<10.00>>921102	<<001>>40<<F>>DK<>G<>Zang, Frances R.	<>Mrs.
6	<<C>>272	<<99.00>>921030	<<002>>40<<F>>DK<>G<>Zarnowski, Arthur A.	<>Mr.
6	<<C>>1531	<<25.00>>921030	<<013>>35<<F>>DK<>G<>Zaziski, Carol	<>Mrs.
6	<<C>>5203	<<50.00>>921029	<<010>>40<<F>>DK<>G<>Zetocha, Edward	<>Mr.
6	<<C>>3484	<<100.00>>921119	<<001>>40<<F>>DK<>G<>Zimmerman, Donald R.	<>Mrs.
6	<<C>>634	<<50.00>>921026	<<004>>37<<F>>DK<>G<>Zimny, Jr., Edwin T.	<>Mr.
6	<<C>>3548	<<25.00>>921104	<<004>>40<<F>>DK<>G<>Zorica, Geraldine M.	<>Mrs.
6	<<C>>3216	<<100.00>>921119	<<003>>39<<F>>DK<>G<>Zoss, Lu Verne	<>Mrs.
6	<<C>>3897	<<25.00>>921102	<<013>>40<<F>>DK<>G<>Zulandt, David F.	<>Mr.
6	<<C>>1004	<<25.00>>921124	<<002>>29<<F>>DK<>G<>Zullo, Mary Jo	<>Mrs.
5	<<C>>8856	<<100.00>>921106	<<004>>40<<F>>DK<>G<>Zumwalt, Barbara J.	<>Mrs.
		<<100.00>>921102	<<016>>39<<F>>DK<>G<>Zussman, Milton Y.	<>Mr.

POC'S ~~list~~ 14-60
 List "C" Page.16

List C XFER 01-11-93

NSF

Biggs, Alice M.	227	20.00
Guenther, Lucille B.	184	25.00
Rosenberg, David A.	170	25.00
Boulerice, Jeffrey S.	0572	30.00

100.00

REFUNDS

Delvecchio, Adele C.	1076	50.00
Bootorich, Jennie	1092	10.00
Harthill, Marion P.	8375	25.00

85.00

ON OTHER LISTS

Getse, Joseph J.	mo	10.00	List 3
Demopulos, Chris	13556	250.00	List 1 Submitted

260.00

UNABLE TO IDENTIFY

Hoyman, Toni	0175	30.00
Larson, Frances M.	mo	100.00
McManus, Mack	8295	50.00
Middleton, James W.	493	125.00
Poger, Lawrence M.	12452	10.00
Bloom, Wilma R.	6248	99.00
Delvecchio, Adele C.	mo	50.00
Oswald, Julie M.	1462	25.00
Weaver, Dennis S.	1154	50.00

539.00

AMOUNT WITH PROBLEMS	984.00
AMOUNT ON POC COMPUTER	206137.56
TOTAL ACCOUNTED FOR	207121.56
XFER AMOUNT	210076.56
UNACCOUNTED FOR DIFFERENCE	2955.00

DEC 10 TRANSFER

177,617.67
PEC
GARDNER

4/17/75
\$1,100.00

First Page

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Andersen, Theodore J

(1)

Edinboro PA	16412-	1012	50.00	19921023
Palo Alto CA	94303-	1022	500.00	19921012
St. Louis MO	63123-	3621	50.00	19921009
Coconut Cr FL	33066-	2479	25.00	19921007
Webster NY	14580-	677	100.00	19921019
East Meado NY	11554-	228	5.00	19921019
Milwaukee WI	53209-	4345	10.00	19921008
San Diego CA	92106-24	1942	20.00	19921009
San Franci CA	94112-	2301	25.00	19921002
Emeryville CA	94608-	2530	25.00	19921019
Glenview IL	60025-41	7353	20.00	19921006
Chapel Hill NC	27514-	1044	10.00	19921023
Hacco TX	76710-	6275	200.00	19921008
Redding CA	96001-	929	15.00	19920928
San Manuel AZ	85631-	9537	10.00	19921023
Berkeley CA	94707-	4080	50.00	19921008
Henderson NV	89014-	MO	25.00	19921006
Fort Worth TX	76107-	4444	25.00	19921002
Las Vegas NV	89123-	565	50.00	19921002
Burlington IA	52601-	2427	500.00	19920914
Fenton MO	63026-	3065	25.00	19921005
Tellico Pl TN	37385-	1563	25.00	19921023
Austin TX	78746-	736	25.00	19921000
Haco TX	76704-29	80	7.00	19920923
Lansing MI	48911-	6759	25.00	19921021
Birmingham AL	35226-	5657	50.00	19921016
Silverdale WA	98383-	665	25.00	19921006
Swarthore PA	19081-	698	125.00	19921016
Pleasant H CA	94523-28	2500	25.00	19921005
St. Louis MO	63112-	2389	25.00	19921005
Key West FL	33040-	2452	10.00	19921007
Chicago IL	60626-	257	5.00	19921021
Melakoff TX	75140-	1426	10.00	19921006
Lubbock TX	79424-14	762	50.00	19921021
Petersburg AZ	99033-	625	20.00	19921007
Salt Lake UT	84102-	1566	40.00	19921002
Winona MO	65588-	2677	100.00	19920929
Novelty OH	44072-	447	25.00	19921006
Dallas TX	75219-	3268	25.00	19921021
Lincoln Pa NJ	07035-	784	100.00	19921021
Stake Coll NY	10010-	2040	50.00	19921016
New York WA	90117-	1035	10.00	19921023
Seattle WA	98107-	104	9.91	19921012
Charleston WV	25302-	5446	15.00	19920916
Little Roc AR	72204-83	5446	30.00	19921016
Arvada CO	80003-	1659	15.00	19921005
New Yarew TN	37825-	3562	50.00	19921013
Boca Raton FL	33420-	813	50.00	19921019
Springfield OH	45504-	1273	50.00	19921012
Madison WI	53703-	1125	100.00	19921020
Rochester NY	14617-	1244	25.00	19921023
Kent OH	44240-	2682	25.00	19921019
Jacksonvil FL	32218-	314	25.00	19921020
Boulder Cr CA	95006-	7412	25.00	19921020

List "Y" FROM Little Roc

Edmund	325 Meadville St.
Elise	1590 Dana Ave
Gloria M.	9927 Rifton Pl.
Edith	2403 Antigua Cir., N
Rochelle	1190 Gate Stone Cir.
Barbara	1500 Hazlack Ave.
William S.	6990 N. Crestwood Dr
Carl	3360 Truebull St.
C. H.	261 Munich St.
Albert J.	8 Captain Dr., #451
Henry	651 Sherer Rd.
Ray Goldstein	101 Greenesadow Ln.
Bill T.	5216 Lake Charles Dr.
Joan	544 Royal Oak Dr.
Robert	Box 671
Janet	922 Shattuck Ave.
Tola	173 Springfield St.
Lola	3721 Linden Ave.
Seri G.	992 Elystan Dr.
B. S.	620 N. 8th Street
Jane	856 Villa Gran Way 2
Roy J.	Rt. 1, Box 369
Phyllis	204 West Spring
Luis H.	1003 Spring St.
Paul F.	3411 Ginger Snap Ln
Lois R.	2425 Hawkebury Ln.
Eloise M.	1274 N.W. Timber Sha
Janet E.	137 Rutgers Ave.
Michael D.	1525 Alvina Dr.
Teresa A.	3350 Pershing, No. 5
Alice J.	804 Catherine St.
John P.	1335 W. Fargo
John V.	Rt. 1, Box 1003
Linda B.	5722 - 69th St.
Louise L.	P. O. Box 1371
Elizabeth M.	680 East 100 South
Velia	General Delivery
Seyour L.	113 Hawthorne Rd.
Stanley I.	7711 Dines Rd.
Suzanne M.	4111 Herschel, No. 2
Lita S.	209 Coaly Rd., Apt.
Dorothy E.	629 Sunset Rd.
Cynthia B.	60 Grassery Park N.
Mary	7335 Dibble N.W.
Anglyne S.	1308 Uper Dartmouth
Charles	9408 Wren Rd.
Charles F.	6445 Newland St.
Chester L.	Rt. 1, Box 193
Graydon E.	22310 SW 65th Avenue
Susan H.	136 Kensington Pl. S
Theodore J.	110 N Bassett St. #2
Ward E.	2107-B Hudson Ave.
Barbara K.	1366 Mockingbird Dr.
Stella D.	115 Sago Ave., N.
Michele M.	246 St. Francis Dr.

Abegg
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Abkowitz
Abrasson
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Accorazzo
Ackvedo
Ackerman
Adasowicz
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Aguliar
Aizley
Ajalkusar
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Akins
Albani
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Albright
Aldueso
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Alprin
Altobello
Alvarez
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Andersen
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Andrews
Angilly

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MIA

NAME	ADDRESS	CITY	STATE	ZIP	AMOUNT	DATE
Youngs	5 Duxbury Lane	Dearborn	MI	48120-2462	15.00	19920930
Youngs	Box 204	Alaogordo	NH	88310-13986	10.00	19921002
Zdravil	1946 James Ave.	St. Paul	MN	55105-3713	50.00	19921001
Zern	151 West Ridge Dr.	West Hartford	CT	06117-4198	50.00	19921021
Zisser	4155 N. Mayfair Rd.	Wauwatosa	WI	53222-6036	25.00	19921016
Zisser	4360 S. Delphine Dr.	New Berlin	WI	53151-2403	50.00	19921109
Zisser	320 W. Olive	El Dorado	KS	67042-1498	10.00	19920928
Zisser	6 Greene St. 6th Fl.	New York	NY	10013-124	30.00	19920914
Zisser	P. O. Box 93	Rincon	GA	31326-0951	30.00	19921008
Zorach	988 Hancock Rd.	Williamsto	MA	01267-0165	100.00	19920930
Zwick	2400 W. 17th St., #8	Longmont	CO	80503-194	20.00	19921003
Zwick	200 Grandview Blvd.,	Seylord	MI	49735-152956	5.00	19921002
Zyck	119 Colchester Dr.	Norsal	IL	61761-2647	100.00	19921019
Zyck	5005 Davenport St.	Oaha	NE	68132-2441	25.00	19921002
Zyck	1492 Great Oak Dr.	Pittsburgh	PA	15220-0214	50.00	19921021

LAST PAGE
"Y"

Poc's Reconciliation

List "Y"

Page one

04 " 04 " 393 " 1037

2	33079	<>Y<>1012	<>002<>01<>F0K<>6<>Abegg, Edmund	<>Mr.
6	15562	<>Y<>3621	<>007<>01<>F0K<>6<>Abels, Elie	<>Mr.
6	15533	<>Y<>3621	<>004<>01<>F0K<>6<>Abels, Gloria M.	<>Mrs.
1	15249	<>Y<>2479	<>002<>01<>F0K<>6<>Abes, Edith	<>Mrs.
1	16348	<>Y<>677	<>012<>01<>F0K<>6<>Abkowitz, Rochelle	<>Mrs.
1	15432	<>Y<>228	<>009<>01<>F0K<>6<>Abramson, Barbara	<>Mrs.
5	4677	<>Y<>4345	<>011<>01<>F0K<>6<>Accomazzo, William S.	<>Mr.
6	15467	<>Y<>1942	<>015<>01<>F0K<>6<>Acevedo, Carl	<>Mr.
6	16974	<>Y<>2381	<>001<>01<>F0K<>6<>Ackerman, Albert J.	<>Dr.
6	16263	<>Y<>2530	<>006<>01<>F0K<>6<>Adamowicz, Henry	<>Mr.
5	1088	<>Y<>7353	<>006<>01<>F0K<>6<>Adams, Amy Goldstein	<>Ms.
6	18031	<>Y<>1044	<>004<>02<>F0K<>6<>Adams, Joan	<>Mrs.
6	14697	<>Y<>6275	<>003<>01<>F0K<>6<>Adams, Robert	<>Mrs.
6	2417	<>Y<>929	<>001<>01<>F0K<>6<>Adelstein, Janet	<>Mrs.
3	15120	<>Y<>9537	<>008<>01<>F0K<>6<>Adelstein, Tola	<>Mrs.
6	15340	<>Y<>4890	<>002<>01<>F0K<>6<>Adeniz, Lola	<>Mrs.
6	13914	<>Y<>CC3892	<>013<>01<>F0K<>6<>Aguilar, Sari G.	<>Ms.
1	129110	<>Y<>4444	<>020<>02<>F0K<>6<>Aizley, B. S.	<>Ms.
3	18537	<>Y<>586	<>015<>01<>F0K<>6<>Ajikumar, Roy J.	<>Dr.
6	10646	<>Y<>2427	<>011<>01<>F0K<>6<>Akins, Jane	<>Ms.
2	17419	<>Y<>3085	<>008<>02<>F0K<>6<>Akmal, M. G.	<>Mr.
6	15341	<>Y<>735	<>003<>01<>F0K<>6<>Albares, Luis H.	<>Mr.
6	11921	<>Y<>CC9212	<>004<>01<>F0K<>6<>Albary, Paul F.	<>Mr.
5	9897	<>Y<>6739	<>012<>03<>F0K<>6<>Albright, Lois R.	<>Mrs.
5	31	<>Y<>5667	<>005<>01<>F0K<>6<>Aldeso, Eloise M.	<>Mrs.
9	9079	<>Y<>665	<>016<>01<>F0K<>6<>Alexander, Janet E.	<>Mrs.
6	16231	<>Y<>698	<>019<>01<>F0K<>6<>Alexander, Michael D.	<>Mr.
1	18241	<>Y<>2390	<>015<>01<>F0K<>6<>Aif, Terresa A.	<>Ms.
1	13732	<>Y<>2390	<>002<>02<>F0K<>6<>Allen, Alice J.	<>Ms.
6	15242	<>Y<>2422	<>006<>01<>F0K<>6<>Allen, John V.	<>Mr.
1	8834	<>Y<>257	<>002<>01<>F0K<>6<>Allen, Linda B.	<>Ms.
2	21627	<>Y<>1426	<>002<>03<>F0K<>6<>Allison, Louise L.	<>Ms.
6	17114	<>Y<>782	<>014<>01<>F0K<>6<>Allison, Elizabeth M.	<>Ms.
6	12483	<>Y<>625	<>009<>01<>F0K<>6<>Almon, Velma	<>Ms.
1	14145	<>Y<>1506	<>011<>01<>F0K<>6<>Alper, Seymour L.	<>Mr.
6	13083	<>Y<>287	<>004<>02<>F0K<>6<>Alprin, Stanley I.	<>Mr.
6	14391	<>Y<>447	<>003<>01<>F0K<>6<>Alvareto, Suzanne M.	<>Ms.
6	18071	<>Y<>3288	<>001<>02<>F0K<>6<>Amateu, Dorothy E.	<>Mrs.
6	17022	<>Y<>784	<>014<>02<>F0K<>6<>Ambrose, Cynthia B.	<>Mrs.
6	14523	<>Y<>292	<>006<>02<>F0K<>6<>Amison, Harry	<>Mrs.
6	16167	<>Y<>2040	<>007<>03<>F0K<>6<>Amores, Angelyne S.	<>Miss
6	17383	<>Y<>105	<>003<>01<>F0K<>6<>Anderson, Theodore J.	<>Mr.
6	15568	<>Y<>104	<>014<>03<>F0K<>6<>Anderson, Charles	<>Mr.
6	15671	<>Y<>125	<>001<>01<>F0K<>6<>Anderson, Charles F.	<>Mr.
6	10995	<>Y<>546	<>015<>02<>F0K<>6<>Anderson, Chester L.	<>Mr.
6	16188	<>Y<>169	<>004<>01<>F0K<>6<>Anderson, Graydon E.	<>Mr.
6	13739	<>Y<>352	<>005<>01<>F0K<>6<>Anderson, Susan H.	<>Ms.
6	16475	<>Y<>813	<>002<>02<>F0K<>6<>Anderson, Ward E.	<>Ms.
6	16475	<>Y<>123	<>007<>02<>F0K<>6<>Anderson, Barbara K.	<>Dr.
2	38720	<>Y<>1244	<>018<>01<>F0K<>6<>Andrews, Stella D.	<>Ms.
1	18548	<>Y<>262	<>016<>01<>F0K<>6<>Angilly, Michele M.	<>Ms.
6	18638	<>Y<>742	<>009<>02<>F0K<>6<>Antonoli, David	<>Mr.
6	13064	<>Y<>404	<>013<>02<>F0K<>6<>Aparicio, Armando	<>Mr.
6	13683	<>Y<>202	<>011<>02<>F0K<>6<>Aprahman, Souren	<>Mr.
6	13812	<>Y<>293	<>008<>01<>F0K<>6<>Apted, Esther L.	<>Ms.
6	18963	<>Y<>5171	<>009<>01<>F0K<>6<>Argyris, Marcia H.	<>Mrs.
6	15743	<>Y<>1199	<>015<>03<>F0K<>6<>Arnold, Gary	<>Mr.
6	13493	<>Y<>551	<>002<>05<>F0K<>6<>Aron, Samuel	<>Mr.
6	15244	<>Y<>2103	<>002<>05<>F0K<>6<>Arthur, Rick H.	<>Mr.
6	16594	<>Y<>1308	<>017<>01<>F0K<>6<>Ash, Billy H.	<>Mr.
6	13693	<>Y<>1307	<>008<>01<>F0K<>6<>Ashburn, Gail E.	<>Mrs.
6	17173	<>Y<>250	<>002<>02<>F0K<>6<>Ashworth, Ernie	<>Mr.
6	16710	<>Y<>748	<>025<>02<>F0K<>6<>Atkinson, W. Russell	<>Mr.
6	10371	<>Y<>235	<>003<>01<>F0K<>6<>Atwill, Lilliane G.	<>Ms.

14100

POC's Rec

List "Y"

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3 26780	<>Y<>1312	<>	50.00<>921008	<>011<>35<>FDK<>6<>	Cherry Y.	<>Ms.
6 15799	<>Y<>1920	<>	40.00<>921014	<>008<>24<>FDK<>6<>	Kenneth J.	<>Mr.
3 13049	<>Y<>4056	<>	500.00<>921019	<>014<>39<>FDK<>6<>	York, James A.	<>Mr.
6 12942	<>Y<>9791	<>	25.00<>920928	<>017<>30<>FDK<>6<>	Yoshida, Marlan	<>Ms.
2 1228	<>Y<>5179	<>	25.00<>920928	<>012<>41<>FDK<>6<>	Young, Gertrude A.	<>Ms.
6 15273	<>Y<>5174	<>	25.00<>921007	<>002<>38<>FDK<>6<>	Young, Keith W.	<>Dr.
1 26338	<>Y<>1142	<>	25.00<>921021	<>009<>41<>FDK<>6<>	Young, Lacy	<>Miss
1 16346	<>Y<>5188	<>	10.00<>921019	<>015<>40<>FDK<>6<>	Young, Nils R.	<>Mr.
3 30632	<>Y<>9010	<>	25.00<>921019	<>024<>09<>FDK<>6<>	Young, S. H.	<>Mr.
6 14601	<>Y<>9921	<>	250.00<>921013	<>003<>36<>FDK<>6<>	Young, Virginia G.	<>Ms.
6 15775	<>Y<>2317	<>	100.00<>921014	<>009<>38<>FDK<>6<>	Young, Willard T.	<>Mr.
6 11075	<>Y<>1937	<>	15.00<>920916	<>001<>40<>FDK<>6<>	Youngquist, Gall L.	<>Mrs.
6 13339	<>Y<>2282	<>	15.00<>920930	<>008<>21<>FDK<>6<>	Youngs, Ruby C.	<>Mrs.
1 29124	<>Y<>1986	<>	10.00<>921002	<>022<>19<>FDK<>6<>	Zang, Marcelle C.	<>Mrs.
6 19731	<>Y<>3713	<>	50.00<>921001	<>008<>39<>FDK<>6<>	Zdravil, Alfred P.	<>Mr.
6 15937	<>Y<>4198	<>	50.00<>921021	<>008<>41<>FDK<>6<>	Zern, Howard R.	<>Mr.
8 10940	<>Y<>6336	<>	25.00<>921016	<>005<>39<>FDK<>6<>	Zimmer, Sharyn L.	<>Mrs.
6 16589	<>Y<>2405	<>	50.00<>921109	<>006<>40<>FDK<>6<>	Zimmerman, Arthur	<>Mr.
6 13136	<>Y<>1198	<>	10.00<>920928	<>010<>43<>FDK<>6<>	Zimmerman, David E.	<>Mr.
6 10338	<>Y<>1124	<>	30.00<>920914	<>020<>36<>FDK<>6<>	Zimmerman, Jay	<>Mr.
6 14809	<>Y<>0851	<>	30.00<>921008	<>010<>35<>FDK<>6<>	Zipperer, Le Mon	<>Mr.
6 13340	<>Y<>0194	<>	100.00<>920930	<>008<>22<>FDK<>6<>	Zorach, Julie Jenks	<>Mrs.
6 13973	<>Y<>2986	<>	20.00<>921005	<>009<>36<>FDK<>6<>	Zucker, Frances H.	<>Ms.
6 15514	<>Y<>2667	<>	5.00<>921002	<>022<>30<>FDK<>6<>	Zucker, Eleanor	<>Ms.
6 16344	<>Y<>2641	<>	100.00<>921019	<>007<>38<>FDK<>6<>	Zwickler, H. Dan	<>Mr.
2 1180	<>Y<>2441	<>	25.00<>921002	<>016<>39<>FDK<>6<>	Zysman, Evelyn Adler	<>Ms.
6 17108	<>Y<>0214	<>	50.00<>921021	<>005<>44<>FDK<>6<>	Zytke, Bernard	<>Mr.
6 12448	<>Y<>3571	<>	25.00<>921013	<>004<>14<>FDK<>6<>	van Empel, Cynthia M.	<>Ms.

Break: Y 177,122.67

List Y XFER 12-10-92

POC's Receipt
List "Y" Page 17 14-63

NSF

Baruchin, Fred	309	25.00
McPhatter, William	369	50.00
Tyler, Bular Mae	647	25.00
Styron, Thomas	116	100.00

200.00

REFUNDS

Churchill, Frederick J.	374	25.00
Nunez, Rene	129	200.00
De Lisa, Jolene	989	20.00

245.00

ON OTHER LISTS

Coker, Tommie	2145	50.00	list C
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AMOUNT WITH PROBLEMS 495.00

AMOUNT ON POC COMPUTER 177122.67

TOTAL ACCOUNTED FOR 177617.67

XFER AMOUNT 176517.67

UNACCOUNTED FOR DIFFERENCE (1100.00)

69 04 392 1035

Transferred ³⁴¹⁹³ ~~20049~~
\$13,175.43

(S) 146

February 23, 1993 Suspense Redesignations Code (sfb)

Alfonso	Carl	8071 Racine St. Birch Run MI 48415- 1442 10.00 1992 1006
Altomare	Mary E.	501 Woodbridge Circle Harleysville PA 19438- 2483 25.00 1992 1130
Baker	Edward	931 White Oake Lane University Park IL 60466- 95010 25.00 1992 1027
Baker	Winona	Rt. 1, Box 9A Pollard AR 72456- MO 10.00 1992 0928
Barry	Nancy C.	1505 E. Frazier Rd. Tuscon AZ 85706- 374 5.00 1992 1110
Barton	Carol E.	P.O. Box 373 Tyronza AR 72386- 1037 50.00 1992 1029
Birnbaum	Elaine	1 Bluff Rd. Glen Cove NY 11542- 2464 25.00 1992 1110
Blair	Joe W.	HCR Box 94 San Simon AZ 85632- 1026 200.00 1992 1026
Blodgett	David M.	5446 N. Wayne Chicago IL 60640- 5267 25.00 1992 1026
Bomar	V.C.	3429 South Brookwood Rd. Birmingham AL 35223- 769 25.00 1992 1102
Brandenburg	Jean	P. O. Box 764 Newark CA 94560- 164 40.00 1992 1105
Brearley	Ann M.	707 Edward Lane West Chester PA 19382- 1258 50.00 1992 0901
Brown	FROM Jeff	2530 Albemarle Richland WA 99352- 6594 50.00 1992 1016

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little book list "S"
SA []

0487 333 40 56

99-04-393-1B41

Brungart	Robert R.	137 R Du Ranelagh 75016 Paris, France 172 100.00 1992 1130
Buck	David A.	86 Richdale Ave., 3 Cambridge WA 02140- 1253 20.00 1992 1105
Budy	Andrea	P. O. Box 1107 Mountain View AR 72560- 1467 25.00 1992 1019
Cannold	Thomas B.	124 W. 60th St., Apt. 48B New York NY 10023- 2998 255.57 1992 1104
Chaffiotte	Jacqueline	97 Beverly Rd. Oradell NJ 07649- 3340 10.00 1992 1016
Christensen	Christine L.	15632 Euclid NE Bainbridge Island WA 98110- 3281 100.00 1992 1106
Cirincione	Dominic L.	1142 Manhattan Ave. #288 Manhattan Beach CA 90266- 6127 250.00 1992 1119
Clayton	Joan H.	1014 Spruce St. Philadelphia PA 19107- 2331 25.00 1992 1028
Clinton	Gerald L.	915 E. Madison Iola KS 66749- 719 50.00 1992 0918
Cohen 34	Norman R.	P. O. Box 220664 Charlotte NC 28222- 1580 1000.00 1992 1023
Consolver	James A.	30561 Adam Apt. B Lake Elsinore CA 92530- 357 20.00 1992 1027
Dickinson	Lillian M.	RT 7, 6170 Danita St. Fayetteville AR 72701- 2046 5.00 1992 1130
Dunne	Christopher E.	205 Hilldale Rd. Villanova PA 19085- 180 500.00 1992 1026

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2487 " 303 " 44 " 50

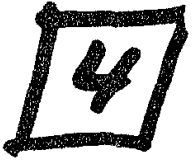
Eaton	Mrs. David J.	3702 Hidden Hollow Austin TX 78731- 3187 200.00 1992 1028
Elrod	Nickii	1020 Rayner Memphis TN 38114- 1953 99.00 1992 1109
Eszterhas	Judith	54 John St. New York NY 07450- 1109 25.00 1992 1030
Farmer	Betty Jo	7159 Cherrywood Ct. Traverse City MI 49684- 1184 50.00 1992 1110
Florio	Maria	P.O. Box 153 Kelly WY 83011- 568 1000.00 1992 1029
Floyd	Stephen C.	306 Pecan Ln. Laurinburg NC 28352- 3818 100.00 1992 1029
Geltmeier	M.H.	4021 Jackie Lee St. N. Richland Hills TX 76180- 4000 3.00 1992 1029
Gillette ✓	James S.	6041 Monterey Avenue Richmond CA 94805-1224 1901 10.00 1992 1026
Glass	Edna	Old Hickory Towers, Box 411 930 Industrial Rd. Old Hickory TN 37138- 2577 5.00 1992 1012
Gray	Vivian M.	1812 Carleton St. Berkeley CA 94703- 3405 50.00 1992 1012
Griffin	Marilyn	842 N. E. 84th St. Seattle WA 98115- 1148 25.00 1992 1110
Grimes	Ann	2421 N. Jackson Little Rock AR 72207- 2216 500.00 1992 1109
Grossman	Cindy L.	225 Walden St., Apt. 6S Cambridge WA 02140- 1868 25.00 1992 1020.

14105

13

STAT 503 40 66

Haas	Mary E.	Rt. 12, 22 Downwood Manor Morgantown WV 26505- 2872 10.00 1992 1102
Halbrook	Karen	2011 W. 85th Ter. Leawood KS 66206- 2182 200.00 1992 1021
Halebian	Paul H.	445 E. 68th St., 11J New York NY 10021- 2813 50.00 1992 1105
Harf	Steven	33 Wildwood Ave. Newtonville MA 02160- 167 250.00 1992 1029
Harmon	Nadine W.	1204 NE 9th Bend OR 97701- 0325 40.00 1992 1110
Hatta	Hana Mariah	49 N. Pleasant St. Oberlin OH 44074- 196 9.01 1992 1116
Hauver	Roberta J.	301 G. St. SW Washington DC 20024- 2960 15.00 1992 1106
Hodge	Martha L.	Res. Rt. 30, King William Co. Box 767 West Point VA 23181- 6133 10.00 1992 1102
Horton	Greta L.	1312 E. Lindsay Dr. Columbus GA 31906- 3620 7.13 1992 1124
Hubschman	Henry	4775 Drake Rd. Cincinnati OH 45243- 1907 500.00 1992 1029
Hunter	Fredericka	5003 Blossom Houston TX 77007- 5792 50.00 1992 1030
Jamieson	William David <i>Jessica</i>	P. O. Box 281 Brooksville ME 04617- 1987 100.00 1992 1026
Jennings	Tomora	3915 E. 28th Wichita KS 67220- 7334 25.00 1992 1117



4481-262-40-54

Johnson	Charles E.	Depptwod Dr. #7 Lexington KY 40505- 6977 100.00 1992 1119
Juric	Joseph O.	171 Echelon Rd. #1 Voorhees NJ 08043- 2430 25.00 1992 1026
Kelly	Tish	404 S. University Dr. Fargo ND 58102- 1479 100.00 1992 1104
Ketchum	Ruth L.	5903 N. Winthrop Chicago IL 60660- 3123 20.00 1992 1110
Klaus	Sylvia H.	2140 Princeton Ave. Philadelphia PA 19149- 1752 25.00 1992 1116
Kornreich	David R.	251 Croton Dam Rd. Ossining NY 10562- 4346 100.00 1992 1029
Kristin	Richard Z.	P.O. Box 5263 Santa Fe NM 87502- 404 100.00 1992 1020
Kurutz	Michael J.	731 East 36th St. Erie PA 16504- 298 30.00 1992 1013
Lewis	Robert E.	825 Midland Blvd. St. Louis MO 63130- 7009 15.00 1992 1021
Loewentahl	Wynn	401 East 86th St. #6N New York NY 10028- 197 25.00 1992 1106
Mannarino	Elizabeth R.	1725 N.W. Lewisburg Rd. Corvallis OR 97330- 1940 25.00 1992 1019
Marver	Betty	816 Pennsylvania University City MO 63130- 8606 50.00 1992 1021
Matsumoto	Kiyoshi	2021 Ichigao-Cho, Midori-Ku Yokohama 227 Japan 280 2.00 1992 1119
MacCarthy	Catherine	935 W. Montana St. 14107

5

Chicago IL 60614-34
0979 200.00 1992 1020

McGee George E. PO Box 16661
Hattiesburg MS 39402-
2047 1000.00 1992 1117

McGraw M. Kathleen 1045 Cheyenne Blvd., No. 27
Satellite Beach FL 32937-
1999 100.00 1992 1109

McNear Mary M. 1305 Kirkwood Dr., No. 302
Fort Collins CO 80525-
1575 100.00 1992 1104

Melaven Emerson J. 1435 4th St., S.W., #B-812
Washington DC 20024-
669 100.00 1992 0921

Merritt Naomi 121 McDonough St.
Brooklyn NY 11216-
1354 50.00 1992 1006

Milgrom Gary A. 3965 Sedwick Ave.
Bronx NY 10463-
2071 50.00 1992 1106

Moeller Marjorie F. 809 E. Pine Street
Alhambra CA 91801-
315 50.00 1992 1029

Montgomery Dinie 2805 Beldon St.
Lake Charles LA 70601-
2902 500.00 1992 1106

Morianos Patricia H. 42 South Road
Bolton CT 06043-
2298 500.00 1992 1119

Mostov Ronald C. 416 Garden Wood Dr.
Youngstown OH 44512-
466 250.00 1992 1110

Nathans Caroline F. 3513 N. Calvert St.
Baltimore MD 21218-
715 75.00 1992 1102

O'Hanlon, Jr. Joseph E. 201 Dora St.
Whitaker PA 15120-
0767 10.00 1992 1027

O'Malley, Jr. Richard F. 9430 Lawndale Ave.



5481 "333" 40 "66
99 "04" 1845

99.04.393.1846

		Skokie IL 60203-5037	100.00	1992	1106
Ornish	Dean	7 Miller Ave. Sausalito CA 94965-0947	25.00	1992	1027
Oudin	Marc	Prospect Building Ste. 224 1501 North University Little Rock AR 72207-	200.00	1992	1119
Perfetti	David W.	62 North Main St. Cortland NY 13045-11212	100.00	1992	1116
Reinhold	Donna M.	P. O. Box 2565 Taos NM 87571-754	25.00	1992	1002
Roberto	Philip	123 N. Norton Ave. Los Angeles CA 90004-MO	50.00	1992	1110
Rose	Nelson H.	2067 Hill Meadows Dr., #2 Springfield IL 62702-4683	40.00	1992	1102
Sarver	Frankie	3737 W. End Ave. #301 Nashville TN 37205-244	100.00	1992	1030
Schneiderman	Barbara	709 Hoska Dr. Del Mar CA 92014-2240	130.00	1992	1106
Semian	Ron	1216 S. Sixth Ave. Scranton PA 18504-455	19.72	1992	1110
Shapiro	Charles Joel	3264 Rowena Ave. Los Angeles CA 90027-3406	50.00	1992	1112
Sherman	Jay P.	120 Hamilton Ave. Silver Spring MD 20901-576	50.00	1992	1023
Taylor	Sharon Walsh	6129 Calico Pool Ln. Burke VA 22015-4488	10.00	1992	1019
Tobin	Jeffrey A.	4343 Lorcom Ln.			



		Arlington VA 22207-3425	25.00	1992	1029
Tran	Nheim Thi	646 N. 13th St. San Jose CA 95112-133	10.00	1992	1110
Varbel	Ann	3434 Lawrence St. SE Salem OR 97302-2835	25.00	1992	1015
Vaughn	Sharla J.	Rt. 6, Box 538 Fayetteville AR 72703-2159	300.00	1992	1104
Walthall	Ronald K.	43 Belle Glades Ln. Belle Meade NJ 08502-8736	50.00	1992	1102
Watson	Calvin R.	1318 Chetworth Ct. Alexandria VA 22314-1654	50.00	1992	1015
Watt	John R.	15 Sargent St. Cambridge WA 02140-2079	25.00	1992	1029
Weber	Paul V. V.	264 Buckner Avenue Haddonfield NJ 08033-396	50.00	1992	1106
West	Lois R.	176 Mooring Buoy Hilton Head Island SC 29928	500.00	1992	1027
Wheeler	Daniel A.	5555 Mt. Pleasant Dr., RR44 Cazenovia NY 13035-5091	15.00	1992	1019
White	John	c/o Eastman Kodak Co. 100 Carlson Rd. Rochester NY 14853-9011	1000.00	1992	1109
Wilson	Moira Z.	4300 Riverside Dr. Sault Ste. Marie MI 49783-2077	25.00	1992	1028
Wold	Dirk L.	13757 Bass Lake Rd. Maple Grove MN 55311-3862	25.00	1992	1116

14-68 S

Wolfe

B. B.

3180 N. Lake Shroe Dr., N
Number 7G
Chicago IL 60657-
470 100.00 1992 1109

Wood

Cleo D.

5535 Monalee Ave.
Sacramento CA 95819-
530 100.00 1992 1109

Wozencraft

Larry Lee

P. O. Box 512
Lucedale MS 39452-
006006 100.00 1992 1109

Zines

P. Kirby

701 Seventh Ave.
Kissimmee FL 34741-
1334 15.00 1992 1102

TOTAL: \$ 13,175.43

3481-363-40-56
59-04-393-1848

14111

9

Primary

Transferred 3/1/93

(S)

February 23, 1993 Resignations

Code (pfb)

Bach	Viola T.	6060 Oxboro Avenue, North Stillwater MN 55082- 6064 10.00 08/17/92
Bowen	Susan H.	Rural Route 3, Box 42C Saint Johnsbury, VT 05819- 2241 25.00 08/07/92
Burns	Margaret V.	5 Candlestick Drive Lutherville MD 21093- 8267 5.00 08/06/92
Champion	Harry B.	18 Vernon Road Natick MA 01760- 1405 100.00 08/14/92
Crerar	P.	6306 35th Avenue Bradenton FL 34209- 3119 15.00 08/10/92
Dowell	Emery B.	Post Office Box 191187 Sacramento CA 95819- 1135 100.00 08/14/92
Fifield	George W.	9 Myrtle Street Jamaica Plain MA 02130- 3216 100.00 08/07/92
Guthrie	Marguerite L.	3215 Northwest 124th Street Vancouver WA 98685- 0544 10.00 08/13/92
Johnson	Allan M.	1919 Mayes Road, SE #A-103 Lacey WA 98503- 1712 30.00 08/12/92
Lamme	Agnes S.	204 N. W. 29th Street Gainesville FL 32607- 5111 25.00 08/14/92
Mason	Lorna T.	478 Fulton Street Palo Alto CA 94301- 2718 50.00 08/10/92
Miller	Patty J.	821 San Francisco Court Stanford CA 94305- 9813 100.00 08/06/92
Morton	Peter	480 East O'Keefe, #303 Palo Alto CA 94303- 297 50.00 08/17/92

14112

1107

99.04.393.1849

Primary

14-69
"5"

Wanerka

Christine E.

75 Red Hill Road
Branford CT 06405-
1155 30.00 08/11/92

TOTAL: \$ 650.00

0581 353 40 86

14113



List "5" shows
discrepancy between

4/28/93 figures and
POC Computer Run -
documents unavailable
to explain difference
appears to have been
in place at one
time . pwa
2/11/97

99-04-393-1853

14-12

FROM SOURCE TO GELAC

\$ transferred 3-15-93 \$4,627.00 for list "J"

O.C 93 TRANSFERS

50.00	+ nett	#0969	10-5-92	\$ 50.00
50.00	+ Street			
50.00	+ ale, FL 33301			
7.00	+			
100.00	+ Street	#6169	10-5-92	\$ 50.00
75.00	+ AZ 85257			
10.00	+			
10.00	+ Hogan	#3834	10-5-92	\$ 50.00
5.00	+ reet			
10.00	+ AZ 85257			
50.00	+ rwin	# 428	10-5-92	\$ 7.00
10.00	+ at			
10.00	+ 60091			
10.00	+			
10.00	+ inney	#7199	10-5-92	\$ 100.00
25.00	+ venue			
10.00	+ 49079			
15.00	+ insohn	#2245	10-5-92	\$ 75.00
1,000.00	+ rive			
1,000.00	+ 7403			
1,000.00	+			
1,000.00	+ Suirk	#1266	10-5-92	\$ 10.00
20.00	+ rry Blossom Dr.			
25.00	+ 97216			
25.00	+			
25.00	+ Suirk	#3210	10-5-92	\$ 10.00
	+ rry Blossom Dr.			
	+ 97216			
	ard	#2713	10-5-92	\$ 5.00
	Street			
	Seattle, WA 98133			
	Elizabeth A. Backus	#2279	11-6-92	\$ 10.00
	7687 Hillside Drive			
	La Jolla, CA 92037			
	Mrs. H. C. Carney	# 268	11-6-92	\$ 50.00
	567 Serpentine Drive			
	Del Mar, CA 92014			
	Annette E. Crosbie	#4412	11-6-92	\$ 10.00
	730 245 Breeze Hill Rd.			
	Vista, CA 92083			
	Marie S. Goyette	#1910	11-6-92	\$ 10.00
	c/o Chittenden Bank			
	P. O. Box 820			
	Burlington, VT 05402			

"J" list FROM L.K
14117 SA

95-04-393-1854

J List FROM SOURCE to GELAC 14-73
6

MARCH 15, 1993 TRANSFERS

James A. Burnett (6, 14171) #0969 10-5-92 \$ 50.00
1009 NE 3rd Street
Fort Lauderdale, FL 33301

Jim Hogan #6169 10-5-92 \$ 50.00
2815 N. 61st Street
Scottsdale, AZ 85257

Margaret P. Hogan #3834 10-5-92 \$ 50.00
2815 61st Street
Scottsdale, AZ 85257

Bradley S. Irwin # 428 10-5-92 \$ 7.00
444 6th Street
Wilmette, IL 60091

Cynthia A. Kinney #7199 10-5-92 \$ 100.00
43931 60th Avenue
Paw Paw, MI 49079

Peter M. Lewinsohn #2245 10-5-92 \$ 75.00
360 Sunset Drive
Eugene, OR 97403

Daniel W. McGuirk #1266 10-5-92 \$ 10.00
11033 SE Cherry Blossom Dr.
Portland, OR 97216

Martha M. McGuirk #3210 10-5-92 \$ 10.00
11033 SE Cherry Blossom Dr.
Portland, OR 97216

Romy A. Shepard #2713 10-5-92 \$ 5.00
923 N. 178th Street
Seattle, WA 98133

Elizabeth A. Backus #2279 11-6-92 \$ 10.00
7687 Hillside Drive
La Jolla, CA 92037

Mrs. H. C. Carney # 268 11-6-92 \$ 50.00
567 Serpentine Drive
Del Mar, CA 92014

Annette E. Crosbie #4412 11-6-92 \$ 10.00
730 245 Breeze Hill Rd.
Vista, CA 92083

Marie S. Goyette #1910 11-6-92 \$ 10.00
c/o Chittenden Bank
P. O. Box 820
Burlington, VT 05402

5001 "000" 40 "00"

"J" Page 1 14118
From Little Rock

Frederick S. Lane III 66 Catherine St. Burlington, VT 05401	#1651	11-6-92	\$ 10.00
Janet B. Loomis 7154 Olivetas Avenue La Jolla, CA 92037	#2104	11-6-92	\$ 10.00
Debra Cohen Klein 267 Pearl St. Burlington, VT 05401	#0885	11-6-92	\$ 25.00
Janet E. Lamborghini 2526 Lozana Road Del Mar, CA 92014	# 122	11-6-92	\$ 10.00
Milton Lasker P. O. Box 1262 Burlington, VT 05402	#1229	11-6-92	\$ 15.00
Janna Pfautz 602 W. 36th Pine Bluff, AR 71603	#4617	11-6-92	\$1,000.00
Gary C. Reynolds 4 Sutton Pl. Pine Bluff, AR 71603	# 377	11-6-92	\$1,000.00
Marie A. Reynolds 4 Sutton Pl. Pine Bluff, AR 71603	# 378	11-6-92	\$1,000.00
Robert P. Pfautz 900 Country Club Ln. #2 Pine Bluff, AR 71603	#4436	11-6-92	\$1,000.00
Marc G. Rucquoi 194 Milo White Rd. Jericho, VT 05465	# 128	11-6-92	\$ 20.00
Lillian S. Shirley 190 Robbins St. Waltham, MA 02164-5108	#15412	11-6-92	\$ 75.00
Jessica S. Smith Lane 66 Catherine St. Burlington, VT 05401	#1597	11-6-92	\$ 25.00

14119

"J" Page 2
from LR

POC's Reconciliation List "J"

181

99 04 393 1857

6.1981	J<>2279	10.00<>921106	<>005<>01<>FDK<>6<>Backus, Elizabeth A.	<>Ms.
6.1471	<>J<>0969	50.00<>921105	<>001<>03<>08<>Burnett, James A.	<>Mr.
6.1981	<>J<>268	50.00<>921105	<>005<>04<>FDK<>6<>Carney, H. C.	<>Mrs.
6.1981	<>J<>412	10.00<>921106	<>005<>06<>FDK<>6<>Crosbie, Annette E.	<>Ms.
6.1981	<>J<>1910	10.00<>921106	<>001<>05<>FDK<>6<>Goyette, Marie S.	<>Mr.
6.1474	<>J<>6169	50.00<>921005	<>001<>06<>FDK<>6<>Hogan, Jim	<>Mrs.
6.1474	<>J<>3834	50.00<>921005	<>001<>07<>FDK<>6<>Hogan, Margaret P.	<>Mr.
6.19206	<>J<>428	7.00<>921005	<>001<>08<>FDK<>6<>Irwin, Bradley S.	<>Ms.
6.1476	<>J<>7199	100.00<>921005	<>005<>19<>FDK<>6<>Kinney, Cynthia A.	<>Mrs.
6.19827	<>J<>0885	125.00<>921106	<>005<>13<>FDK<>6<>Klein, Debra Cohen	<>Ms.
6.19821	<>J<>122	10.00<>921106	<>005<>13<>FDK<>6<>Lamborghini, Janet E.	<>Mr.
6.19842	<>J<>1597	10.00<>921106	<>005<>35<>FDK<>6<>Lane, Jill	<>Mrs.
6.19826	<>J<>1597	15.00<>921106	<>005<>20<>FDK<>6<>Lane, Jessica S. Smith	<>Mr.
6.1477	<>J<>1229	75.00<>921005	<>001<>09<>FDK<>6<>Lasker, Milton	<>Mr.
6.19624	<>J<>2245	10.00<>921106	<>005<>16<>FDK<>6<>Lewinsohn, Peter M.	<>Ms.
6.1478	<>J<>1266	10.00<>921106	<>001<>10<>FDK<>6<>Loomis, Janet B.	<>Mr.
6.1478	<>J<>3210	10.00<>921005	<>001<>11<>FDK<>6<>McGulirk, Daniel V.	<>Mrs.
6.19837	<>J<>4617	1000.00<>921106	<>005<>26<>FDK<>6<>McGulirk, Martha M.	<>Mrs.
6.19836	<>J<>4336	1000.00<>921106	<>005<>30<>FDK<>6<>Pfautz, Jenna	<>Mr.
6.19836	<>J<>377	1000.00<>921106	<>005<>28<>FDK<>6<>Pfautz, Robert P.	<>Mr.
6.19838	<>J<>378	1000.00<>921106	<>005<>29<>FDK<>6<>Reynolds, Gary C.	<>Mr.
6.1481	<>J<>128	20.00<>921106	<>005<>31<>FDK<>6<>Reynolds, Romy G.	<>Mr.
6.1481	<>J<>2713	5.00<>921005	<>001<>13<>FDK<>6<>Rucquoi, Marc A.	<>Mr.
6.19641	<>J<>1554	75.00<>921106	<>005<>34<>FDK<>6<>Shipley, Lillian S.	<>Ms.

Break: J 4,827.00

99.04.393.1852

No recap for
List "J"

in balance with
list sent from
Little Rock.

Transfers from POC System

Hugh's Name Contact Field	Pat's Name	Trans. Date	Bank Amount	Computer Amount	Computer Records	Print Title
p1 p2 Extra	List 3	10/06		311,929.42	6,806	POC1
	List 3	10/09	399,498.94	391,922.94	8,013	
	List 3	10/09		10,793.00	19	
				714,645.36	14,838	
p3 cv2	List 5	10/15	NA	146,276.12	2,869	POC2
	List 5	10/15	NA	47,910.00	190	
				194,186.12	3,059	
p4 p5	List 6	10/27	NA	26,608.50	457	POC3
	List 6	10/27	NA	35,509.50	756	
				68,118.00	1,213	
poc2 poc3 cv1	List 7	11/05		4,250.00	13	POC4
	List 7	11/05		22,183.00	58	
	List 7	11/05		54,500.00	81	
				81,683.00	152	

NOTE: This is only "summary" of lists as sent from Little Rock. "Hugh" somebody worked in Little Rock accounting department, probably for Allen Wegehof and/or Barbara Yates -- this document was generated in Little Rock and sent to Pat Anderson.

Anderson Report - Tab 15

15001-15118: Documents pertaining to Andersons' pending libel suit

The arguments and statements in each document are discussed in detail in Documentary With References, Tab 2, Sections 24.0 through 32.0.

03/24/95 Bill Anderson, having served in the U. S. House of Representatives with White House Chief Counsel Abner Mikva, wrote a letter March 24, 1995, and advised him of the false statements made on behalf of the President's campaign Committee [Doc 15001-5/A]

Several days later, Pat Anderson called Mr. Mikva's office at the White House and asked if the letter had been received; the woman who answered the call replied they had received the letter; Mr. Mikva however never responded.

06/16/95 Attorney for the Andersons, Mike Geltner, sent a detailed letter to the CPC, Lyn Utrecht, and Barbara Yates informing them that the Andersons were aware of the false statements and were preparing to file suit. [Doc 15006-13B]

06/29/95 Lyn Utrecht and the CPC responded with a lengthy letter which stated among other things, that what Utrecht said was true; absolutely privileged, defamatory or not; and admitted to by the Andersons. [Doc 15014-25/C]

07/05/95 Andersons file COMPLAINT (Damages for Libel) [Doc 15026-39/D]

09/19/95 Utrecht/CPC file Motion to Dismiss [Doc 15040-70/E]

09/27/98 Andersons file Plaintiffs' Opposition to Defendants' Motion to Dismiss [Doc 15071-15103/F]

10/10/95 Utrecht/CPC file Reply Memorandum in Support of Defendants' Motion to Dismiss [Doc 15104-15118/G]

10/24/95 Andersons file amended Complaint adding 1992 GELAC as Defendant (document not included)

11/06/95 Utrecht/CPC file Defendants' Motion to Dismiss Amended Complaint (document not included)

11/16/95 Andersons file Plaintiffs' Memorandum in Opposition to Defendants' Motion to Dismiss Amended Complaint (document not included)

11/19/95 A hearing was held in U.S. District Court on the Motion to Dismiss (for reason of privilege). A transcript of that hearing is in Tab 12.

07/31/98 The ruling regarding privilege is forthcoming.

15000

10906 Lake Windermere Drive
Great Falls, Virginia 22066
March 24, 1995

PERSONAL AND CONFIDENTIAL

Eyes only Judge Mikva

The Honorable Abner Mikva
The White House
Washington, D. C. 20500

Dear Judge Mikva:

It was a good while back, but perhaps you will recall that we served together in the House for a term or two.

I have been very reluctant to contact you about the matter at hand but finally decided to do so, realizing that a low key, confidential meeting with you could be the best chance of avoiding any course of action that could be damaging to the President.

The issue at hand, very briefly, is this: Our database management company did the contributions management and related matching funds submissions and other work for the Clinton for President Committee primary '92. Our team, headed by my wife, Pat, did a record-breaking job. Despite this, the Committee Counsel went out of her way to single us out in a series of undeserved and untrue swipes in her written response to the FEC Interim Audit Report. These comments were quoted or otherwise referred to in the official FEC Final Audit Reports, which are, of course, public documents.

In sum, our company has been badly damaged and libeled by these gratuitous statements. This presents us with one of the most perplexing dilemmas we have ever had to face.

There may be very good reasons why you will choose to not meet with us, and we will understand. If you feel a meeting is in order, however, I would suggest that it be in the next few days, in confidence and away from your office at a location of your choosing.

I can be reached at 703/406-0209 (home) or 202/675-4900 (office).

I have followed your distinguished post-Congressional career in the press and sincerely hope this finds you and yours enjoying the best of health and happiness.

Sincerely,



William R. Anderson

Enclosures

15001

Tab 15- (2)

ESSENCE:

- Committee counsel took not one but four swipes at our company (POC) in her written response to the FEC Interim Audit Report
- These swipes were repeated or referred to in the FEC Final Audit Report for Clinton for President (primary) and in the Final Audit Report for Clinton/Gore & Clinton/Gore Compliance Fund (general election). POC had nothing at all to do with the general election.
- Committee counsel repeatedly defended vendors EXCEPT POC. POC was singled out.
- All of the swipes against POC were undeserved, unnecessary, and untrue.
- In fact, POC's performance for the Committee was outstanding. Records were set as to the percentage of matching submissions accepted for matching by the FEC (99.48%). Records were also set as to the amount of unacceptable contributions converted into FEC-acceptable by the meticulous review and affidavit program carried out by POC.
- Swipe number three is of particular concern. The Committee handled these redesignations, NOT POC. The implication of greed on our part is devastating. To the contrary, POC voluntarily and on its own initiative reduced its unit prices as volume increased so as to save the Committee \$110,270.21.

ABOUT Public Office Corporation (POC):

- Founded 1978 by William R. and Patricia W. Anderson.
- Serves mainly political customers, but some commercial.
- Never had a salesperson, we always relied on a good reputation and word-of-mouth recommendations by satisfied customers.
- Has provided services to five presidential campaigns, but Clinton for President was the only one involving a nominee.
- Serves a number of Senate customers. Also the Vice President.
- Prides itself on quality, versatility, fast turnaround.

3/25/95 M:KVA

15002
15002

(3)

Libelous Statements made by Committee's counsel, Lyn Utrecht, in the
July 6, 1994, Response of Clinton for President Committee to the Interim
Report of the Audit Division.

Statement #1 - Page 2 and 3, (II. A.) of Response

"The auditors found discrepancies in the Primary Committee's beginning balance, receipts, disbursements and ending balance, all of which were materially corrected by amendments filed on July 2, 1993. These misstatements were essentially due to errors by one of the Committee's computer vendors who failed to reconcile her records to the accounting data and bank reconciliation provided by the Committee's accounting department."

POC's comment: gratuitous, malicious, false

Statement #2 - Page 3, (II.B.) of Response

"On July 2, 1993, the Primary Committee filed amended reports which materially corrected the itemization omissions identified by the auditors and therefore no further action is recommended in the audit report. However, the Committee notes that it does not agree with the auditors' results projecting itemization errors of 8%. The Committee further notes that many of the errors occurred during June, July and August of 1992. During this period, the Committee experienced significant difficulties with the vendor preparing the Primary Committee's reports."

POC's comment: gratuitous, malicious, false

Statement #3 - Page 40, (II.D.) of Response

"The auditors focused here on whether these contributions were properly redesignated to the Compliance Fund, but, in fact, in order to have been considered primary contributions in the first instance, the regulations required that they be designated in writing for the primary. Very few of them were so designated. The Committee's vendor who processed these contributions treated them as 'redesignations' even though they were not. That vendor's contract had been negotiated early in the campaign by the Committee's original counsel and included an incentive for the vendor to treat contributions as though additional documentation or affidavit was necessary. Under the contract, the vendor received an additional amount per contribution for which additional documentation or an affidavit was botained. The Committee staff did not see these contributions until well after the election, but relied solely on the vendor's expertise to handle the contributions appropriately."

POC's comment: gratuitous, malicious, false

Statement #4 - Page 41, (II.D.) of Response

"In those instances where they were not totally superfluous the 'redesignations' sought and obtained by the Committee's vendor merely serve as confirmation that the contributors intended these contributions to be made to the Compliance Fund since there may have been some ambiguity in the way in which the checks were made out or in the unsigned cards that were attached to the checks."

POC's comment: gratuitous, malicious, false

15003

3/25/95 M:KVA (4)
15-Doc A

Libelous Statements made in FEC audit report for the Clinton for President Committee (the primary campaign) based on exit conference reports and the Committee's Response to the Interim Audit Report.

Statement #1 - Page 5; Page 9, approved 12/27/94

"In its response to the Interim Audit Report, the Committee states that 'these misstatements were essentially due to errors by one of the Committee's computer vendors who failed to reconcile her records to the accounting data and bank reconciliation [sic] provided by the Committee's accounting department.' "

POC's comment: gratuitous, malicious, false

Statement #2 - Page 6; Page 10, approved 12/27/94

"In addition, the Committee acknowledges that during June, July, and August of 1992, 'the Committee experienced significant difficulties with the vendor preparing the Primary Committee's reports.' "

POC's comment: gratuitous, malicious, false

Statement #3 - Page 83; Page 87, approved 12/27/94

"The Committee states that the redesignations were obtained by the vendor who processed contributions for the Committee without the Committee's knowledge. The explanation suggests that due to provisions in that vendor's contract, the vendor stood to gain by sending the redesignation requests."

POC's comment: gratuitous, malicious, false; the Committee obtained the redesignations

Statement #4 - Attachment 5, Page 3 of 3; Page 122, approved 12/27/94 (quoting from description of services furnished the FEC by Committee)

"It is anticipated that upon completion of the current phase of the FEC audit all records remaining in custody of POC will be moved to Arkansas and the relationship terminated other than on an advisory basis as needed during the duration of the audit period."

POC's comment: publicly fired after a record-breaking performance in behalf of Clinton for President

Statement #5 - Page 16; Page 158, approved 12/27/94 (quoting FEC counsel)

"The Primary Committee contends that the redesignations were performed by mistake by a former vendor."

POC's comment: FEC's acknowledgement that POC had been fired for "mistake" that had made.

15004

(6)

3/25/95 M:KVA
15 - Doc A

Libelous Statements made in FEC audit report for the Clinton/Gore '92 Committee and Clinton/Gore '92 General Election Compliance Fund (the general campaign and the legal & compliance fund aka GELAC) based on exit conference reports and the Committee's Response to the Interim Audit Report of the general election and GELAC interim audits.

Statement #1 - Page 14; Page 18, 12/27/94

"In response to the Interim Audit Report, the Compliance Fund puts forth several arguments why no repayment is due. To begin with, the Compliance Fund argues that the contributions in question were not primary contributions but rather were for the most part undesignated contributions received after the date of the primary election and pursuant to the 11 CFR Section 110.1 general election contributions. As general election contributions, the Compliance Fund contends that no redesignations were necessary to transfer the contributions from the Primary Committee. The response notes that the Primary Committee's vendor, who processed these contributions, treated them as 'redesignations' without the Primary Committee's knowledge. The explanation suggests that due to provisions in that vendor's contract, the vendor stood to gain by sending the redesignation requests."

POC's comment: gratuitous, malicious, false; the Committee obtained the redesignations

Statement #2 - Attachment 4, Page 3 of 3; Page 98, 12/27/94
(quoting from description of services furnished the FEC by Committee)

"It is anticipated that upon completion of the current phase of the FEC audit all records remaining in custody of POC will be moved to Arkansas and the relationship terminated other than on an advisory basis as needed during the duration of the audit period."

POC's comment: publicly fired after a record-breaking performance in behalf of Clinton for President

Statement #3 - Page 12; Page 120, 12/27/94
(quoting FEC counsel)

"The General Committee contends that the redesignations were performed by mistake by a former vendor."

POC's comment: FEC's acknowledgement that POC had been fired for "mistake" that had made.

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June 16, 1995

Clinton for President Committee (1992)
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VIA CERTIFIED MAIL

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VIA CERTIFIED MAIL

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Barbara Yates
c/o Baird Kurtz and Dobson
400 West Capital Avenue
Suite 2500
Little Rock, Arkansas 72203

VIA CERTIFIED MAIL

Re: Public Office Corporation and William Anderson and Patricia Anderson

Dear Madams and Sirs:

I represent Public Office Corporation ("POC") and its principals, William and Patricia Anderson. My clients have retained me to bring a libel action against you for false and defamatory statements of and concerning them which were made in the Clinton for President Committee's response to the interim audit report of the Federal Election Commission ("FEC") regarding the 1992 Clinton campaign.

The response was filed by Ms. Utrecht and the Committee on July 6, 1994, and prepared by them with the participation of Ms. Yates and Baird Kurtz and Dobson.

The FEC repeated portions of the Committee's response in the final audit reports. Thus, the most damaging segments of the false and defamatory statements about my clients were republished on December 27, 1994, in the FEC's final report of the audit on the Clinton for President Committee ("Committee"), and the Clinton/Gore '92 Committee ("Clinton/Gore Committee") and Clinton/Gore '92 General Election Compliance Fund ("GELAC").

Ms. Utrecht, as a former FEC employee, is aware of the FEC's common practice of including all or part of a committee's response in an audit report. Publishers of a libel are legally responsible for such foreseeable republications.

As a result of these false, malicious, and gratuitous comments, the personal and business reputations of the Andersons have been severely damaged at the FEC and again, upon republication and dissemination, among candidates and staff and in the campaign services and election-law community.

The Andersons, through their small campaign services company (POC), worked very hard on behalf of the Clinton for President Committee, to build and maintain a trusting relationship with the staff of the FEC.

The FEC had frequent contact with the Andersons from November 1991 through June 1993, as POC fulfilled the FEC reporting requirements of the Clinton for President Committee.

The numerous, libelous statements made by the Committee were presented to the FEC as facts although they were totally false and gratuitous. Dozens of people working at the FEC (auditors, clerks, attorneys, managers, and Commissioners) read the false comments. The false, damaging comments were reinforced over and over again as the FEC staff pondered and prepared the audit information for the Commissioners and the public. When the Committee wrote of "the vendor who processed the contributions" and the vendor "who failed to reconcile her records" it was abundantly clear that the references were to POC and Patricia Anderson, respectively.

The FEC is a virtual training ground for future campaign consultants, future campaign legal counsel, and future election law experts, as demonstrated by Ms. Utrecht having once been an attorney employee of the FEC. Thus, the ability of the Andersons and POC to regain their good reputation at the FEC has been negatively impacted.

The FEC's subsequent republication of the libelous statements as facts in separate, official FEC audit reports covering the three committees directly responsible for the election of the President and Vice President of the United States had the effect of giving the weight of truth to the false, gratuitous statements.

Presidential primary and general election audit reports are read and scrutinized by numerous individuals and the press. They are also routinely read by hundreds of political consultants, accountants, election-law attorneys, professional campaign managers, and other trusted advisors of the candidates themselves.

Observers of the audit process and readers of the audit reports who are not immediately aware that POC was the Committee vendor referred to in the various libelous statements, can clearly identify POC as

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such vendor by the list of computer systems and services utilized by the primary Clinton Committee and the Clinton/Gore Committee that was included in the audit report. This 3 page list of vendors, prepared by the Committee at the request of the FEC, gives details about the responsibilities of every computer vendor providing services to any of the Clinton Committees. The list is included as part of the official audit document as Attachment 5 in the Clinton for President Committee audit report and Attachment 4 in the Clinton/Gore '92 and GELAC audit report.

The following are excerpts of the defamatory statements:

A. The discrepancies in the Committee's beginning and ending balances were "misstatements [which] were essentially due to errors by one of the Committee's computer vendors who failed to reconcile her records to the accounting data and bank reconciliation provided to her by the Committee's accounting department."

Not true.

B. "[M]any [...] errors" occurred during June, July and August, 1992 and "during this period, the Committee experienced significant difficulties with the vendor preparing the Primary Committee's reports."

Not true.

C. "The Committee staff did not see these contributions until well after the election..."

"The Committee's vendor who processed these contributions treated them as 'resignations' even though they were not."

The Committee "... relied solely on the vendor's expertise to handle the contributions appropriately."

Not true. The resignations were initiated and managed not by POC but by the Clinton Headquarters in Little Rock.

D. "The vendor's contract ...included an incentive for the vendor to treat contributions as though additional documentation or affidavit was necessary. Under the contract, the vendor received an additional amount per contribution for which additional documentation or an affidavit was obtained." (In reference to the resignations.)

This is an especially hurtful false and gratuitous statement in that my clients voluntarily and on their own initiative reduced their prices below contract, saving the Committee \$110,000.

E. "...totally superfluous the 'resignations' sought and obtained by the Committee's vendor..."

Again, the resignations were done not by my clients but by Clinton Little Rock Headquarters.

F. "...all records remaining in custody of POC will be moved to Arkansas and the relationship terminated..."

(POC was publicly fired. The comment is made on the list of vendors which was included in both audit reports.)

G. "The Primary Committee contends that the redesignations were performed by mistake by a former vendor."

(The FEC's counsel acknowledged the impression that the Committee had terminated its relationship with POC because of a mistake POC had made. This comment is made by the FEC counsel in its opinion of the audit report of each Committee; the opinion is made part of each audit report.)

The false, gratuitous statements about my clients which can be found in several places in the response and republished in several places in the two audit reports, have terrible, unmistakable allegations:

- the Andersons and their company acted unprofessionally and irresponsibly toward the Committee,
- the Andersons acted on their own with regard to the important, controversial and improper redesignation of contributions from the primary campaign to GELAC,
- the Andersons performed an improper and superfluous task in order to be able to charge the Committee for it, and
- and the Committee fired the Andersons for their mistakes.

The false statements impute a general lack of ability and integrity that would be required of owners and managers of a computer services company supporting a presidential primary campaign.

After examination of documents and correspondence generated during the campaign, extensive interviews with the Andersons, review of the Committee's response, review of the audit reports where the libelous statements were republished, and review of various other audit reports, I have come to the following conclusions about the Anderson's performance of their responsibilities for the Clinton for President Committee, which can be summarized as follows:

- The Andersons took on enormous responsibility for the Clinton for President Committee and never faltered in that responsibility.
- The Andersons kept excellent records of all work performed for the Committee and they kept working papers supporting matching funds submissions and compliance filings.
- The contributor data on the POC computer was always reliable and of highest quality; the matching funds acceptability grade assigned the Clinton submissions by the FEC was the highest ever achieved by any major presidential candidate (99.48% average).

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- The expenditure data on the POC computer was considered the standard to which the Little Rock accounting system must balance before the filing of a complete set of amendments, which written reference had been made to as early as March 1992.
- The Andersons had an excellent relationship with everyone at the Committee and with the numerous Clinton contributors it had to contact to obtain clarifying information.
- The Andersons had an excellent reputation with the staff at the FEC.
- Pat Anderson was openly praised for her good work and that of POC by campaign attorney Christine Varney during the Fall of '92 at a meeting that focused on primary audit matters; Lyn Utrecht and Barbara Yates, among others, were present at that meeting.
- The Andersons, through their company POC, performed an overall outstanding job for the committee during the period November 1991 through June 1993.
- The Andersons and POC had absolutely nothing to do with obtaining the contribution redesignations as asserted by the Committee.
- POC was instructed to send to Schuh Advertising in Little Rock a series of computer tapes containing the name, address, and contribution information that was used as the basis for Little Rock Headquarters to obtain the redesignations.
- POC had no part in the decision whether or not to obtain the redesignations, no part in the selection of contributors to receive the redesignation solicitation, no part in the design of the estimated 50,000+ mailing to individual primary contributors, no part in the processing of the signed redesignations upon their return to Committee headquarters in Little Rock, and no part in batching the redesignations into amounts to transfer from the primary Committee's account to the GELAC account.

My clients have an original redesignation letter that was returned to Little Rock Headquarters as undeliverable by the Postal Service and sent to POC so that person's computer record could be marked as a bad address. It is a single-page letter acknowledging receipt of the contributor's PRIMARY CONTRIBUTION and asking the contributor to redesignate it to GELAC. The letter is signed by a facsimile of Bill Clinton's signature with the redesignation affidavit in the lower third of the letter; a business reply envelope marked "Compliance" was enclosed. The original mailing envelope is post-marked Little Rock.

As the roughly 35,000+ signed affidavits were returned to Little Rock, they were processed and batched into approximately 15 different bank transfers which moved the money from the primary Committee accounts to the GELAC account, with the first transfer occurring on October 5, 1992 and the last transfer occurring approximately six months later in March 1993. The processing, batching, and transfers were managed by Ms. Yates and others employed by Baird Kurtz and Dobson plus, possibly, staff of the Committee.

POC received a computerized printout from Allen Wegehoff of Baird Kurtz and Dobson of contributors comprising each batch of redesignations transferred; each redesignated batch corresponded to a transferred amount; sometimes a copy of the deposit slip made out in Little Rock was attached to the printout.

POC's only job was to mark the primary contributor database with each redesignation transferred to the GELAC so that the planned FEC amendments would accurately reflect the contributions transferred to GELAC.

POC marked redesignated contributions in the main database according to the batches in which that contribution was transferred. POC prepared a final reconciliation of every penny transferred from primary to GELAC. The reconciliation fills two large 3-ring binders, a set of which was delivered to Ms. Utrecht in April 1993.

Surely the Committee, Ms. Utrecht, Ms. Yates, and Baird Kurtz and Dobson did not allow such false, libelous remarks about POC and the Andersons as a result of confusing several dozen affidavits designed to save the Committee the excessive (over \$1,000) portion of over limit contributions (under a covering letter using POC's letterhead) with the massive redesignation project in question. This project involved sending, over a period of weeks, more than 50,000 solicitations requesting redesignations on letterhead of "Bill Clinton ★ Al Gore" with a notation at the bottom of the letterhead "Paid for by the Clinton/Gore '92 Compliance Fund."

Why would the Committee and Ms. Utrecht and Ms. Yates single out POC as the one vendor to receive such harsh and false criticism while at the same time, vigorously defend and protect from blame, the practices and actions of all other vendors and providers of services to the Committee?

Indeed, after reading other, unrelated audit reports, I cannot find a single instance where vendors for a presidential primary campaign have received any criticism at all, much less powerful, defamatory statements that impute lack of skills and integrity as the false statements about POC and the Andersons so powerfully asserted.

I speculate that the reason for the false statements had a lot to do with the obvious attempt of the Committee to disassociate itself from the necessity of obtaining from the contributor authorization to transfer his contribution from the primary account to the GELAC account. The only way to do that was to blame POC for obtaining the redesignations without the knowledge of the Committee. In order to make POC's sending the redesignations without the knowledge of the Committee more plausible, other false and gratuitous remarks about POC were made to create the total impression that POC was unprofessional, irresponsible, performing superfluous work to fatten its billings, and had to be "terminated" for their mistakes.

The term that comes to mind is scapegoat. I believe the Committee felt the need for a scapegoat on which to pin the responsibility of sending the redesignation letters in order to further its argument of "un"designated versus "re"designated primary contributions subsequently transferred to GELAC. But no matter what the reason, the pattern of unwarranted and untrue statements made about my clients presents clear and deliberate malice.

Both Bill Anderson and Pat Anderson have professional and personal reputations for being honest and responsible people. Their personal reputations and their sense of well being have been severely damaged by the Committee for whom they worked so hard, for whom they did a superb job, for whom they endured great pressures, and for whom they expended their personal, physical, and emotional resources so that the Committee's interests were always taken care of and promoted.

To be so casually and maliciously maligned and to have their carefully laid plans for their future profoundly disturbed has been extremely stressful and they are very upset.

My clients are not out to hurt anyone, directly or tangentially, particularly President Clinton. Thus I am writing this letter because of that and because it is my practice to explore settlement in all cases prior to suit. Accordingly, if you are interested in pursuing settlement, we would be willing to meet with you or otherwise discuss the matter. You should be advised, however, that it is our intention to file suit in the United States District Court in Virginia if there is no response to this letter before June 30, 1995.

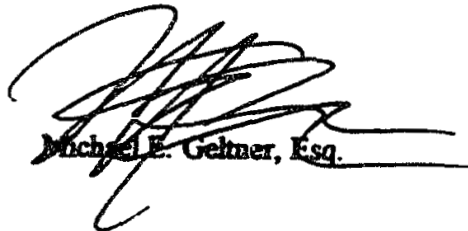
You may be of the view that statements contained in a report filed with the FEC are privileged, but that is not the case. Statements to an administrative agency are only covered by an absolute privilege where the proceeding is quasi-judicial in nature. See, e.g., Elder v. Holland, 208 Va. 15, 155 S.E.2d 369 (1967). This is not the case here, as the FEC audit/response process is not sanctioned in statute and is an informal process established by FEC rules which precedes any formal action toward recovery of matching funds. See Reagan Bush Committee v. FEC, 525 F.Supp. 1330 (D.D.C.1981). In some places, such as Virginia, such agency filings may be subject to a qualified privilege, while other jurisdictions do not recognize any privilege. The qualified privilege is defeated by actual malice. In this case, we expect to establish both actual malice in the constitutional sense (i.e., knowing falsity or reckless disregard) and in the common law sense. See, e.g., Crawford and Co. v. Graves, 199 Va. 495, 100 S.E.2d 714 (1957). In addition to defeating any qualified privilege, such proof lays the basis for punitive damages. See Gertz v. Welch, Inc., 418 U.S. 323 (1974).

The plaintiffs view their reputations and business prospects as so tainted as to be virtually ruined. This comes at a time, after 17 years in business, when they were poised to take their place as the preeminent computer and consulting company for the Democratic candidates for president (having served five presidential primary campaigns, two of which were for the current president and current vice president of the United States).

For settlement purposes, you should be aware of our valuation of the injuries to my clients. For POC, we value loss of goodwill at \$750,000; lost future profits at \$1,110,000, and other injury to the business at \$450,000; and the projected lost earnings to the individual plaintiffs from their business at \$1,350,000 for Patricia Anderson (20 years until retirement) and \$200,000 for William Anderson (four years before full retirement).

The close association of POC with the Anderson's personal reputations makes them one and the same and makes the libels of and concerning them as well. We have not valued these matters nor those of emotional distress for settlement.

Very truly yours,



Michael E. Geltner, Esq.

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June 29, 1995

Michael E. Geltner, Esq.
10 E Street, S.E.
Washington, D.C. 20003

Re: Your letter of June 16, 1995

Dear Mr. Geltner:

On behalf of the Clinton for President Committee ("Committee"), Lyn Utrecht, Esq., Baird Kurtz and Dobson, and Barbara Yates, I have been retained to respond to and file appropriate motions under Rule 11, Fed. R. Civ. P., concerning your threat of a frivolous libel action arising out of particular phrases at pages 8, 40 and 41 (and page 3 of an Attachment) of the forty-three page response filed July 6, 1994 with the Federal Election Commission by the Clinton for President Committee objecting to the FEC Interim Audit Report.

There is an absolute privilege for attorneys, parties, and witnesses to publish any matter (including alleged or actual defamatory matter) in "communications preliminary to a proposed judicial proceeding." Restatement (Second) of Torts §§ 586-588 (1977). This ironclad Restatement rule is well established law in the District of Columbia. See, e.g., Conservative Club of Washington v. Finkelstein, 738 F. Supp. 6, 13 (D.D.C. 1990) (applying absolute privilege of Section 586 to "communications preliminary to a proposed judicial proceeding" and imposing Rule 11 sanctions on plaintiff); McBride v. Pizza Hut, No. 94-CV-642, 1995 WL 807554, at *3 (D.C. May 15, 1995) (statement "geared toward avoiding . . . proposed litigation" was absolutely privileged under Section 586).

Here, the FEC was conducting a statutory audit pursuant to 26 U.S.C. § 9038. This audit was preliminary to a proposed judicial proceeding under 26 U.S.C. § 9040 which authorizes the Commission to file suit "to seek recovery of any amounts determined to be payable to the Secretary as a result of an examination

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Michael E. Geltner,

June 29, 1995

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and audit made pursuant to Section 9038.⁹ All statements in the Committee's July 6, 1994 response to the FEC Interim Audit Report were preliminary to a proposed judicial proceeding under 26 U.S.C. § 9040, and therefore are absolutely privileged under the Restatement as adopted in the District of Columbia.

An independent absolute privilege also exists with respect to information furnished to a federal agency concerning matters within its jurisdiction. Mazanderan v. McGranery, 490 A.2d 180, 182 (D.C. 1984). This absolute privilege is constitutionally compelled by In re Quarles, 158 U.S. 532 (1895), holding that it is the right of every citizen to communicate information to the executive branch about a "violation of the internal revenue laws of the United States," *id.* at 537, and "such information, given by a private citizen, is a privileged and confidential communication for which no action of libel or slander will lie." *Id.* at 535-36. These Supremacy Clause considerations require the identical absolute privilege for submissions to the Federal Election Commission, particularly since the Presidential Election Campaign Fund Act is part of the Internal Revenue Code, 26 U.S.C. § 9001 *et seq.*, as to which Quarles is binding and dispositive.

Similarly, the controlling District of Columbia law recognizes an absolute privilege with respect to submissions in the District of Columbia by an attorney in the District of Columbia to an agency located in the District of Columbia, as required by statute where the information supplied is to be kept confidential by the agency except as otherwise provided by law. Goggins v. Hoddes, 265 A.2d 302 (D.C. 1970); *see also* McBride, 1995 WL 307554, at *2; Elliott v. Healthcare Corp., 629 A.2d 6, 9 (D.C. 1993). Under 26 U.S.C. § 9033, it is a condition of eligibility to receive FEC funds that a candidate shall in writing "(3) agree to an audit and examination by the Commission under Section 9038 and to pay any amounts required to be paid under such section." 26 U.S.C. § 9012(g)(1) similarly requires that "it shall be unlawful for any individual to disclose any information obtained under the provisions of this chapter except as may be required by law." Having been required by federal statute to submit to the FEC audit and to answer questions of the FEC auditors subject to the confidentiality provisions, the absolute privilege of Goggins and its progeny is applicable here.

As you know, not once in its forty-three page Committee response is your client Public Office Corporation ("POC") mentioned by name and the sole reference in the Appendix is in response to a specific FEC question about POC. Nor are POC's principals, William and Patricia Anderson, mentioned at all. It is well established that "the officer of a corporation who is not personally defamed has no right to recover damages for defamation published about the corporation." Elm Medical Laboratory, Inc. v. RKO General Inc., 532 N.E.2d 675 (Mass. 1989); *cf.* Golden Palace, Inc. v. National Broadcasting Co., 386 F. Supp. 107 (D.D.C. 1974)

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(recognizing distinction between defamation of corporation and defamation of corporate officers), aff'd, 630 F.2d 1094 (D.C. Cir. 1976). Moreover, with respect to the corporation that you represent, six of your seven lettered references refer to an unnamed vendor and in any event the seven references (that you label A through G) are true. Each is discussed below.

Statement A is Absolutely Privileged, True, and Not Negligently Made.

You object to the sentence on page 3 of the Committee's FEC response that "these misstatements were essentially due to errors by one of the Committee's computer vendors who failed to reconcile her records to the accounting data and bank reconciliation provided to her by the Committee's accounting department."

FEC auditors found that there had been a misstatement of financial activity by discrepancies in the Primary Committee's beginning balance, receipts, disbursements, and ending balance, all of which were materially corrected by amendments filed on July 2, 1993. Because the FEC Interim Audit Report found these to be "misstatements," the FEC's term "misstatements" was correctly used in the response filed by the Committee.

As you know, in Paragraph 1.1 of the December 8, 1991 Agreement between the Committee and POC, "POC agrees to undertake and perform the tasks necessary to ensure that the Committee receives the maximum matching funds to which it is entitled from the Federal Election Commission ("FEC") under applicable law." These tasks included "100% responsibility for matching funds submissions" and "100% responsibility for FEC compliance reporting" according to Attachment 1 which is expressly incorporated by reference in Paragraph 1.1 of that Agreement. POC was, to quote its own words, "responsible for getting Clinton-92 qualified to receive matching funds, tracking all contributor data and FEC expenditure data, and submitting all matching funds and FEC Compliance Reports for the 1992 campaign." (POC Memorandum dated February 23, 1995.) Thus, Statement A, to which you object, is true, supported by FEC findings and subsequent Committee amendments to FEC filings and in any event not negligently made.

In order to prove defamation, your corporate client ("the vendor") must prove that a statement is false, and that this statement was negligently made by the Committee and its attorneys; and if your client is a limited purpose public figure for purposes of FEC filings for the Committee, that the statement was maliciously made. Reuber v. Food Chemical News, 750 F.2d 1039, 1060 n.31 (D.C. Cir. 1984) (subsequent history omitted). You cannot prove nor even allege any of these required elements.

Statement B Is Absolutely Privileged, True, Not Negligently Made And A Statement Of Opinion Which As A Matter Of Law Cannot Be Defamatory.

Your objection so edits the text as to alter its plain meaning. The full text (with your objection underlined) is as follows:

The auditors performed a sample review of Primary Committee contributions and apparently identified 26 contributions that were not itemized as required. On the basis of this sample, the auditors projected that 8% of the Committee's individual contributions that required disclosure were not itemized.

On July 2, 1993, the Primary Committee filed amended reports which materially corrected the itemization omissions identified by the auditors and therefore no further action is recommended in the audit report. However, the Committee notes that it does not agree with the auditors' results projecting itemization errors of 8%. The Committee further notes that many of the errors occurred during June, July, and August of 1992. During this period, the Committee experienced significant difficulties with the vendor preparing the Primary Committee's reports.

The "errors" referred to in this passage are itemization errors found by the FEC in its sample review at p.5 of its Interim Audit Report. They were corrected by the Committee's July 2, 1993 amended disclosure reports as found by the FEC Interim Audit Report at p.6 ("These amended reports materially corrected the irregularities noted above"). It is a true statement that many of these errors found by the FEC "occurred during June, July, and August of 1992." The FEC Interim Audit Report so states at p.5 ("In addition, 17 of the sample errors involved contributions received in the June, July and August 1992 reporting period"). Whether 17 errors in three months is "many" is a statement of opinion "dependent upon personal perspective," which is not actionable as a matter of law. Liberty Lobby Inc. v. Dow Jones & Co., Inc., 838 F.2d 1287, 1300 (D.C. Cir.), cert. denied, 488 U.S. 825 (1988).

It is also true that "during this period, the Committee experienced significant difficulties with the vendor preparing the Primary Committee's Report." The errors found by the FEC exemplify in part the difficulties. In any event, the Committee's experience of significant difficulties is a statement of opinion that is not subject to libel or defamation laws. Liberty Lobby Inc., supra.

**The Three Parts of Statement C Are Absolutely Privileged,
True, Admitted by Your Client, and Not Negligently Made.**

With respect to the three partial sentences that you object to in Statement C, the first statement ("The Committee staff did not see these contributions until well after the election ...") does not refer to any vendor but solely to Committee staff. Even if incorrect, it is not defamatory because there is no reference to your corporate client.

The second sentence that you claim is defamatory is that "the Committee's vendor who processed these contributions treated them as 're-designations' even though they were not."

This statement is true and supported by written admissions of your client. Your factual denial betrays a total lack of factual investigation that is sanctionable under Rule 11 of the Federal Rules of Civil Procedure. Your corporate client, as well as your individual clients, admitted in a memorandum dated February 23, 1995 that POC work for the Clinton '92 Campaign included "reconciled 30,000 + contributions redesignated to GELAC."

There was also a contemporaneous admission of POC's error by October 6, 1992 memorandum from POC signed by Patricia Anderson to Patty Reilly. Your client states, in full, as follows (emphasis supplied):

**Re: Management of the redesignation of overlimit contributions to
GELAC**

Patty, it is obvious, though you have been calm about it, that you are not happy with the way the POC managed the obtaining of affidavits to redesignate overlimit contributions to the GELAC. And today I got a letter from Christine Varney stating that she is distressed about the statements obtained from contributors.

First of all I would like to say that I am very sorry to cause any additional stress on anyone. I know things have been at a hectic plateau for months and months. Also, I have seen the effects of well meaning, independent action gone sour and I regret this situation might fall in that category.

I would like to recount my actions and assumptions regarding POC's management, and, perhaps, it will at least document what and why things happened the way they did.

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- Our procedure has been to resolve overlimit and reattribution issues and obtain necessary documentation on a monthly basis.
- In order to achieve compliance and maximize the next matching funds report, we typically generated our affidavits the day after the last submission was made. This kept everything current.
- We have some telephone logs dated as early as March 19, 1992, where we discussed overlimit conditions with contributors and the option of getting a refund or redesignating the overlimit amount to the legal and compliance fund that was to be set up.
- Where the contributor opted for a refund, we sent it to Little Rock for a refund; where the contributor gave us new information regarding the correct attribution, we set that up and sent out a request for the appropriate affidavit; where the contributor wanted to apply the overlimit amount to the upcoming legal and compliance fund, we so noted it and marked the computer.
- I do not know the exact date the legal and compliance fund was setup but it was about the same time that the deluge of contributions began. (On May 29th nearly 10,000 different checks were put into the bank and the volume did not let up until September).
- I do recall my trip to Little Rock in early June; you and I sat down and went over the excessive listing; we added up the amount by hand and I believe it was around \$7800.
- I remember also talking to Christine one day around that time and assuring her that the excessives would not be an issue because we were preparing a set of affidavits; I told her that I thought (correctly) that most everyone we had talked to would return their affidavit redesignating the excess.
- At this time, I wrote a cover letter to the applicable contributors referring to our earlier conversation about redesignation; I also restated in this letter the fact that they could request a refund if they wished; I prepared the redesignation statement with the amount to be redesignated already filled out; I requested the contributor to date the statement as of the date of their last contribution -- this is the date that made them "overlimit" by whatever amount.
- It seemed perfectly reasonable to me to do this. All of these people had been talked to before. Almost without exception they were most anxious that the campaign derive maximum benefit from their contribution(s). In most instances they did not realize that they were overlimit. Thus, it was evident the



contributors wanted to do whatever was legally proper to see that their money helped Governor Clinton.

In retrospect, I should have sought professional counsel on such factors as dating the redesignation of excessives and the interplay between that and the GELAC fund opening. I am sorry that I did not.

The third phrase to which you object is that "the Committee staff ... relied solely on the vendor's expertise to handle the contributions appropriately" (emphasis supplied; "staff" omitted in your paraphrase). This is again a true statement supported by the clear language of the December 8, 1991 Agreement which itemizes POC's duties, admitted by your client's memorandum of October 6, 1992 and in any event, a statement of opinion and belief by Committee staff which, even if mistaken, is not actionable under the laws of libel, defamation, or slander. Liberty Lobby Inc., 838 F.2d at 1300.

Statement D is Absolutely Privileged, True, and Not Negligently Made Since it Exactly States Paragraphs 4.4 and 4.5 of the December 3, 1991 Agreement.

You object to part of the sentence at page 40:

that vendor's contract . . . included an incentive for the vendor to treat contributions as though additional documentation or affidavit was necessary. Under the contract, the vendor received an additional amount per contribution for which additional documentation or an affidavit was obtained.

Paragraphs 4.4(b) and (c) and 4.5(b) of the December 3, 1991 Agreement so state as quoted below:

- 4.4 The Committee shall pay POC the following fees: (a) \$2.50 for each contribution processed, (b) \$2.00 for each affidavit sent, which fee shall include the cost of a personalized forwarding letter; and (c) \$2.00 for each affidavit executed and returned for submission to the FEC.

- 4.5 The Committee shall pay POC the following Incentive Fee if any given monthly Matching Funds Submission receives an FEC grade of between 98.0% and 100%, an Incentive Fee equal to (a) an additional \$1.00 per contribution processed in such month plus (b) \$0.50 per affidavit mailed to contributors in such month. . . .

Your conclusory complaint is squarely contradicted by the plain language of the contract.

Statement E is Absolutely Privileged, True, Admitted by Your Client and Not Negligently Made.

You object to these underlined words at page 41:

In those instances where they were not totally superfluous, the "redesignations" sought and obtained by the Committee's vendor merely served as confirmation that the contributors intended these contributions to be made to the Compliance Fund since there may have been some ambiguity in the way in which the checks were made out or in the unsigned cards that were attached to the checks.

Your objection omits a "not" and distorts the plain meaning of the sentence which is true. Your client admitted that POC "reconciled 30,000 + contributions redesignated to GELAC." Your conclusory statement that POC had nothing to do with the redesignations is wrong and contradicted by your client's own written statement.

Statement F in the Attachment to the Committee's Response to the FEC is Absolutely Privileged, Directly Responsive to a Specific FEC Request about POC, True, Not Defamatory and Not Negligently Made.

Page 30 of the FEC Interim Audit Report of April 1, 1994 requests:

- (1) Provide the following information regarding Equipment and Facilities:

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- In chronological order, list the various computer systems and data entry services used by the Committee, the General Committee, and the Compliance Committee at all relevant times during the campaign. Identify the time periods that the various systems were used, and how each system was used by the Committee, and how the systems differed from each other.
- Explain and document the functions of Public Office Corporation ("POC"), with respect to services provided to the Committee. Explain and document whether the functions performed by POC were performed on any computer system owned or leased by the Committee. Explain and document whether any POC files were moved to any computer system owned or leased by the Committee, and provide the date(s) the transfer occurred.

In response to this information requested in the Interim Audit Report, the Committee submitted a chronology of the campaign's computer systems (described by the FEC as Attachment 5 "including services provided by Public Office Corporation beginning in December of 1991 and continuing to the present"). See FEC Report of the Audit Division on Clinton for President Committee (Dec. 27, 1994) at 45 (emphasis supplied).

Attachment 5 at page 3 states in full the following in response to FEC questions about POC (with the language to which you object underlined):

December 1991-Present

Equipment: N/A due to service bureau nature of services

Vendor: Public Office Corporation (POC)

Functions Performed: Public Office Corporation provided data processing services for Clinton for President in the area of producing required contribution records and related matching funds submissions. They also maintained information on cash disbursements and prepared the FEC monthly compliance reports for the periods December 1991 through March 1993. During late 1992 and early 1993, the Committee began the difficult task of moving the POC maintained data to Committee computers in Arkansas. POC has continued to provide minimal services as requested since that time. At present, POC still maintains certain duplicate records and answers questions relative to the ongoing audit. It is anticipated that upon completion of the current phase of the FEC audit all records remaining

in custody of POC will be moved to Arkansas and the relationship terminated other than on an advisory basis as needed during the duration of the audit period.

POC provided no services to Clinton/Gore '92 or the related Compliance Committee.

Termination of your client's contract relationship with the 1992 Primary Committee "other than on an advisory basis as needed during the duration of the audit period" as stated by the Committee in Attachment 5 is not the same as your contention that "POC was publicly fired" (Geltner letter of June 16, 1995 at page 4). First, your client's contract had expired, by its terms, on March 1, 1993. Paragraph 2.1 of the December 3, 1991 Agreement states:

- 2.1 This Agreement shall commence on the date set forth in the first Paragraph of this Agreement and shall terminate, subject to the provisions set forth in Section 2.1, on March 1, 1993. Thereafter, at the sole option of the Committee, the term may be extended for additional periods under terms and conditions mutually agreed upon by the parties.

Second, it was "at the sole option of the Committee" to extend the term of your client's services after March 1, 1993 under paragraph 2.1 of the Agreement and it was "at the sole discretion of the Committee" to terminate for any reason thereafter under paragraph 2.2 of the Agreement.

The 1992 primaries concluded in June 1992; the FEC audit concluded on December 27, 1994. The Committee's statement in Attachment 5 that the relationship will be terminated at the conclusion of the audit period reflects the normal winding down of a 1992 primary committee three years after these primaries had been concluded.

The portion of the sentence to which you object is a statement of future intent. This portion of the sentence is not actionable because it is a statement of opinion or belief that is not subject to the laws of defamation, libel or slander. Liberty Lobby Inc., supra. Moreover, the statement is true and permitted by the contract.

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**Statement G Was Not Made By The Committee,
Its Lawyers Or Accountants, But Is A Direct
Quotation By The FEC General Counsel.**

Statement G ("The Primary Committee contends that the redesignations were performed by mistake by a former vendor") is not a statement made by the Primary Committee in its July 6, 1994 response. It is a direct quotation from page 16 of the FEC General Counsel's Memorandum of November 3, 1994 to the Audit Division of the Federal Election Commission. Neither the Committee nor its attorney having made the statement, there is no cause of action against them.

Conclusion

With respect to any litigation filed by you on behalf of POC or anyone else contesting privileged and true phrases from the July 6, 1994 FEC filing, we will seek Rule 11 sanctions against you and any plaintiff. The D.C. Circuit has recently upheld Rule 11 sanctions of \$149,000 in similarly frivolous libel litigation. Geller v. Randi, 40 F.3d 1300 (D.C. Cir. 1995). We will also file a counterclaim for indemnification of the hundreds of thousands of dollars in actual costs to correct FEC-claimed errors and in potential penalties that the FEC is currently considering for FEC-claimed errors in the FEC filings that your client had the contractual obligation to prepare - correctly - for the Committee.

We note that your letter contains no allegations against the two Arkansas accountants other than a suspicion that they might have participated in the preparation of the submission to the FEC (which is in itself an absolutely privileged submission). Inclusion of the Arkansas accountants is independently sanctionable under Rule 11 for lack of jurisdiction in Virginia, see Va. Code Ann. § 8.01-328.1 (1991) (requiring that defendant's wrongful "act or omission" occur in Virginia for personal jurisdiction to exist); lack of venue in Virginia, see 28 U.S.C. § 1391 (1988); and the dispositive fact that the Arkansas accountants did not make the July 6, 1994 submission to the FEC by the Committee that was signed by the Committee's counsel.

Because the activities referred to in your letter arose out of the filing in Washington, D.C. with the Federal Election Commission by an attorney with offices in Washington D.C. and POC's office was in the District of Columbia (911 Second Street, N.E. Washington, D.C. 20002) when it entered into the December 3, 1991 Agreement with the Committee specifying in Section VII that all disputes were to be governed by the law of the District of Columbia, your threat to file a lawsuit in

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Michael E. Galtner, Esq.

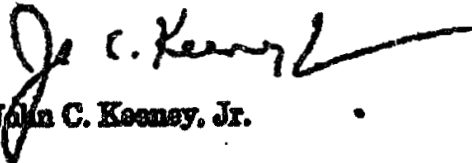
June 29, 1995

Page 12

the United States District Court of Virginia would also violate Rule 11 because there is neither personal jurisdiction nor venue over these Washington, D.C. acts, which in any event are absolutely privileged and true as admitted by your client.

If you would like to discuss these matters more fully, please call me at the above number.

Very truly yours,



John C. Keeney, Jr.

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89-04-393-1885

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

PUBLIC OFFICE CORPORATION
911 Second Street, N.E.
Washington, D.C. 20002,

WILLIAM ANDERSON
10906 Lake Windermere Drive
Great Falls, Va 22066,

and

PATRICIA ANDERSON
10906 Lake Windermere Drive
Great Falls, Va 22066,

Plaintiffs,

-vs-

CLINTON for PRESIDENT COMMITTEE (1992)
124 West Capital Avenue, Suite 1150
Little Rock, Arkansas 72201,

and

**LYN UTRECHT also known as
CAROLYN UTRECHT**
5201 Roosevelt Street
Bethesda, Maryland 20814

Defendants.

CASE NUMBER 1:95CV01264

JUDGE: Louis F. Oberdorfer

DECK TYPE: Civil General

DATE STAMP: 07/05/95

CIVIL ACTION NO.

PLAINTIFFS DEMAND
TRIAL BY JURY

COMPLAINT (DAMAGES FOR LIBEL)

Plaintiffs for their complaint herein, allege through the undersigned counsel as follows:

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1. The court's jurisdiction is based on diversity of citizenship under 28 U.S.C. § 1332, in that the parties are citizen of different states and the amount in controversy exceeds \$50,000, exclusive of interest and costs. This is an action for libel in which the 1992 Clinton for President (primary) Committee, having been shown in an interim audit by the staff of the Federal Election Commission ("FEC") to have received excessive federal matching funds, sought to avoid repayment to the U.S. Treasury and, in the process, falsely blamed their computer service contractor for obtaining 30,000 plus contributor-signed redesignation statements and thereby libeled the contractor and its principals.

2. Plaintiff Public Office Corporation ("POC") is a Delaware corporation with its principal place of business in the District of Columbia.

3. Plaintiff William Anderson is a citizen of Virginia.

4. Plaintiff Patricia Anderson is a citizen of Virginia.

5. Defendant Clinton for President Committee ("Committee") is, upon information and belief, an unincorporated association which was formed, originally under the name of Clinton Exploratory Committee, for the purpose of sponsoring the candidacy of Bill Clinton for the 1992 Democratic Party presidential nomination. The use of (1992) in the caption is solely for description and not part of its name. Its sole members are John Tisdale, ("Tisdale")

Custodian, and J.L. "Skip" Rutherford ("Rutherford"), Treasurer. Upon information and belief, Tisdale and Rutherford are all citizens of Arkansas. Committee is a political committee organized to apply for and receive federal matching funds under the Presidential Election Campaign Fund Act ("PECFA"), 26 USC §§9001 et seq., and, as such, was required to file its organization with FEC under the Federal Election Campaign Act, ("FECA"), 2 USC §432. It is subject to suit in its own name. For diversity of citizenship purposes, it is an Arkansas citizen due to its members' Arkansas citizenship.

6. Defendant Lyn Utrecht, also known as Carolyn Utrecht, ("Utrecht") is, upon information and belief, a citizen of Maryland.

7. This court has subject matter jurisdiction of this action under 28 USC §1332, in that the parties are citizens of diverse states and the amount in controversy, exclusive of interest and costs, exceeds \$50,000. This court has in personam jurisdiction over defendants under D.C. Code §13-423 in that the acts causing injury occurred in the District of Columbia and in that the injury occurred in the District of Columbia and elsewhere and defendants regularly did business and engaged in a persistent course of conduct in the District of Columbia. This court has venue in this case in that a substantial part of the actions and effects involved in the suit occurred in the District of Columbia.

8. POC is in the business of providing data processing, data management and other support services for political campaigns and in providing presidential campaigns with services necessary to obtain federal matching funds under PECFA.

9. Plaintiffs William Anderson and Patricia Anderson are the founders and co-principals of POC and are actively involved in sales, client support, technical implementation, meeting of deadlines and client relations of POC to such an extent that persons in the political community and FEC associate POC and its activities with them in all respects.

10. POC has been in the foregoing business since 1978, and, during the period of its existence, has developed a reputation for outstanding service and performance in its field, having provided similar services to four other prior presidential primary committees. This reputation is shared by its principals, William and Patricia Anderson, whose professional and personal reputations are inextricably involved with POC's business reputation. William Anderson is a former Congressman and Naval Officer and has an independent and outstanding reputation in the military, legislative and political community from which POC draws its clients and which is subject to damage if POC's reputation is damaged.

11. In 1991, Committee retained POC as its vendor to provide computer and presidential primary campaign related services, including data processing and support work necessary to obtain matching funds under PECFA, which consisted of, *inter alia*, interacting with

contributors and preparing the necessary documentation for filings with FEC to obtain matching funds under PECFA.

12. POC and William and Patricia Anderson have enjoyed an outstanding reputation at FEC and a good working relationship among FEC employees, especially during the period they filed the matching fund submissions and compliance reports on behalf of Committee.

13. Two committees were formed for Bill Clinton's general election campaign for president in 1992 with Albert Gore as Vice Presidential candidate: Clinton/Gore '92 Committee ("Clinton/Gore") and Clinton for President General Election Compliance Fund ("GELAC"), the latter authorized to pay general election legal and accounting expenses. Under certain circumstances in a presidential campaign, contributions not exceeding the individual limit originally made to a primary campaign committee can be redesignated to a type of committee formed to pay for legal and accounting expenses which, if paid by the general election committee, might cause the general election committee to exceed legal limits established by FEC. While the word "redesignation" may appear in other contexts in presidential campaigns (such as the transfer of funds from overlimit contributions), for purposes of this complaint, the term "redesignation" is limited to the transfer of funds given by contributors not exceeding the contributors' legal limits. POC's responsibilities for Committee had nothing to do with redesignations. Funds were redesignated from Committee

to GELAC by Committee staff and management, other than POC, operating in Little Rock, Arkansas, and this staff ran a major effort in Committee's Little Rock, Arkansas headquarters, involving over 30,000 redesignations and the related documentation. All redesignations were accomplished in this manner, and POC had no participation in the process other than after the fact computer records reconciliation.

14. POC performed the services which it had agreed to provide for Committee in an outstanding manner, and POC's record in obtaining and legally maximizing Committee's recovery of federal matching funds was the highest in the history of a major presidential primary campaigns. During this period, POC enjoyed a good relationship with Committee and as volume allowed, POC and William and Patricia Anderson, on their own initiative, additionally lowered the already discounted, agreed upon fees for their services amounting to in excess of \$100,000 savings to Committee.

15. In or about 1993, at FEC request, Committee submitted with FEC a list of its vendors ("the vendor list") that provided computer systems or computer services used by the Committee, with a description of functions. Committee listed POC as providing data processing related to contribution records and related matching fund submissions and described POC's functions and identified POC as the vendor responsible for producing, *inter alia*, FEC Compliance reports as a result of which FEC and others with access to the vendor list could readily identify POC as Committee's vendor for such functions.

16. Subsequent to the 1992 general presidential election, the staff of FEC conducted an audit of Committee and issued an interim report ("the interim audit"). This interim audit and its follow up Committee response and final audit were part of an informal, non-judicial process conducted at FEC for the purpose of reviewing Committee compliance with law and regulations, including identifying matching funds which were improperly obtained by a campaign organization and laying the basis for reporting to the FEC commissioners whether the FEC staff believed any matching funds were improperly obtained by the campaign organization. The interim audit identified several areas of improper matching funds obtained by Committee, including redesignations.

17. Under FEC's informal non-judicial process, the campaign organization was allowed to submit to FEC staff a response to the interim audit. It was FEC practice that the points raised in the response would be republished in the FEC staff's final recommendation to the FEC commissioners, which would be contained in a final audit report ("the audit") and in which the FEC staff would discuss the campaign organization's points.

18. Utrecht was counsel for Committee.

19. On July 6, 1994, Utrecht, acting on her own behalf and as counsel to Committee and on behalf of Committee so as to make Committee legally responsible, submitted Committee's response to the interim audit ("the Committee response"). At the time there was no

administrative or judicial litigation pending or under serious consideration between Committee and FEC or the FEC staff.

20. The Audit was a public document which was placed on file at FEC, circulated to members of FEC and FEC staff, was made available to the public and press and was sent to people kept on a list at FEC and circulated to members of the political community.

21. The Committee response made the following statements of and concerning POC and William and Patricia Anderson which were all false and defamatory ("the statements"):

a. In the following language, that POC had performed improper redesignations without the Committee's knowledge:

The auditors focused here on whether these contributions were properly redesignated to the Compliance Fund, but, in fact, in order to have been considered primary contributions in the first instance, the regulations required that they be designated in writing for the primary. Very few of them were so designated. The Committee's vendor who processed these contributions treated them as "redesignations" even though they were not. That vendor's contract had been negotiated early in the campaign by the Committee's original counsel and included an incentive for the vendor to treat contributions as though additional documentation or affidavit was necessary. Under the contract, the

vendor received an additional amount per contribution for which additional documentation or an affidavit was obtained. The Committee staff did not see these contributions until well after the election, but relied solely on the vendor's expertise to handle the contributions appropriately.

xxx

In those instances where they were not totally superfluous the "redesignations" sought and obtained by the Committee's vendor merely serve as confirmation that the contributors intended these contributions to be made to the Compliance Fund since there may have been some ambiguity in the way in which the checks were made out or in the unsigned cards that were attached to the checks.

b. That "the vendor's" contract "included an incentive for the vendor to treat contributions as though additional documentation or affidavit was necessary," thereby meaning that POC's motivation for performing the improper redesignation acts referred to in the preceding statement was greed.

c. The discrepancies in Committee's beginning and ending balance were "misstatements [which] were essentially due to errors by one of the Committee's computer vendors who failed to reconcile her records to the accounting data and bank reconciliation provided to her by the Committee's accounting department."

d. That "errors" occurred during June, July and August, 1992, and "[d]uring this period, the Committee experienced significant difficulties with the vendor preparing the Committee's reports."

e. All of the foregoing statements were of and concerning POC and William and Patricia Anderson in that defendants intended the statements to refer to them and all readers of the response so understood the statements, particularly because of the vendor list.

22. All of the statements were published by defendants to FEC staff, and defendants knew, or should have known that FEC would republish them.

23. Defendants made all of the statements with actual malice, in that they knew the statements were false or made the statements with reckless disregard for their falsity. Defendants were also negligent and at fault in making the statements.

24. None of the statements were privileged, because the Committee response was a part of an informal, non-judicial process followed at FEC and the statements were not made in anticipation of litigation, nor were they required by law nor made to petition the government for a redress of grievances. The statements were made to mislead the FEC staff and leaders of its anticipated audit, particularly as to the redesignations, because Committee was trying to treat the contributions as "undesigned" and sought a scapegoat for its own prior treatment of them as redesignations.

25. On December 27, 1994, FEC staff published and made available to the public and FEC subscribers the Audit. The Audit republished the statements as follows:

a. The Audit states:

In response to the Interim Audit Report the Committee puts forth several arguments why *no repayment is due*. To begin with, the Committee argues that the contributions in question were not primary contributions but rather were for the most part undesignated contributions received after the date of the primary election and, pursuant to the 11 CFR §110.1, general election contributions. As general election contributions, the Committee contends that no redesignations were necessary to transfer the contributions to the Compliance Committee. The Committee states that the redesignations were obtained by the vendor who processed contributions for the Committee without the Committee's knowledge. The explanation suggests that due to provisions in that vendor's contract, the vendor stood to gain by sending the redesignation requests.

b. The same statement as the preceding statement is repeated in the FEC audit of Clinton/Gore and GELAC.

c. The Audit says "the Committee states that 'these misstatements were essentially due to errors by one of the Committee's computer vendors who failed to reconcile her records to the accounting data and bank reconciliation [sic] provided to her by the Committee's accounting department'."

d. The Audit says:

In response to the Interim Audit Report, the Committee states that it does not agree with the auditors' results projecting itemization errors of 8%. However, the Committee did not provide any documentation or other relevant information to support its position. In addition, the Committee acknowledges that during June, July and August of 1992, "the Committee experienced significant difficulties with the vendor preparing the Primary Committee's reports." Irrespective of such vendor problems, the Committee itself, and its treasurer, have the responsibility of complying with 2 U.S.C. §434(b)(3)(A) and 11 CFR §104.3(a)(4).

26. The vendor list is attached to the Audit, thereby identifying all of the statements as relating to POC and being of and concerning POC and William and Patricia Anderson, and the vendor list publicly stated that the Committee's relationship to POC will be terminating, thereby causing readers to believe that POC was terminated for error, malfeasance and bad faith.

27. All of the statements caused actual damage to POC and William and Patricia Anderson in the following respects:

a. Their business reputations suffered injury.

b. Their personal reputations for integrity and capability suffered injury.

c. They have lost business.

d. They have lost the ability to solicit and obtain business, because all campaign business is obtained on the basis of success in past business and their most prominent former client has publicly labeled them in an official government report as having been incompetent, committed improper acts without the client's knowledge and motivated by greed.

e. They have suffered severe emotional anguish, upset, humiliation and distress as a result of the public injury to their reputations and reduction of their ability to earn a livelihood.

f. The reputation of POC and William and Patricia Anderson at FEC has been destroyed, thereby making it impossible for them to work effectively at FEC.

28. The statements are libelous per se of POC and William and Patricia Anderson in that they relate directly to their business and profession of providing computer and data processing and management services and FEC matching funds services.

29. The statements have caused POC and William and Patricia Anderson special damage, as set forth above, as well as actual damage.

30. All of the statements were made without privilege and maliciously and willfully with actual malice and common law malice for no bona fide reason and in bad faith for an ulterior

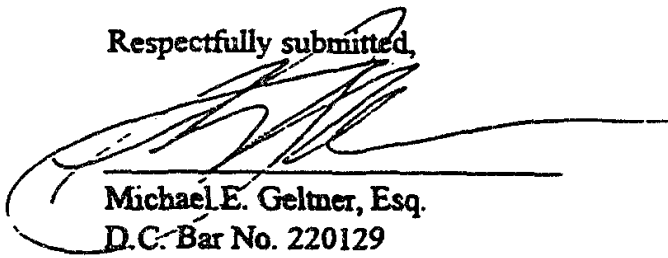
motive and, as a result, defendants should be made to pay punitive damages.

Wherefore, Plaintiffs demand damages against all defendants jointly and severally, as follows:

- A. For POC, damages of \$1,250,000.
- B. For William Anderson, compensatory damages of \$200,000.
- C. For Patricia Anderson, compensatory damages of \$ 800,000.
- D. For all plaintiffs, punitive damages in an amount which the jury and court determine to be proper.
- E. Such other relief as is just and proper.

Plaintiffs Demand Trial By Jury

Respectfully submitted,



Michael E. Geltner, Esq.
D.C. Bar No. 220129
Geltner & Associates
Number 10 E Street, S.E.
Washington, D.C. 20003
202-547-1136

Attorney for Plaintiffs
Public Office Corporation,
William Anderson and
Patricia Anderson

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

PUBLIC OFFICE CORPORATION,
WILLIAM ANDERSON, and
PATRICIA ANDERSON

Plaintiffs,

v.

Civil Action No. 95-1264 (LFO)

CLINTON FOR PRESIDENT
COMMITTEE
124 West Capital Ave.
Suite 1150
Little Rock, Arkansas 72201

and

LYN UTRECHT
5201 Roosevelt Street
Bethesda, Maryland

Defendants.

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MOTION TO DISMISS UNDER 2 U.S.C. § 437d(c)

Pursuant to Rule 12 of the Federal Rules of Civil Procedure, defendants Clinton for President Committee (the "Committee") and its attorney for Federal Election Commission audit matters, Lyn Utrecht of the Washington, D.C. law firm of Oldaker, Ryan & Leonard, move to dismiss this action by the corporate plaintiff and two individual plaintiffs.

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1. Plaintiffs' Complaint alleges libel based upon four phrases in sentences about an unnamed vendor found at pages 3, 40 and 41 of the forty-three page legal Response filed July 6, 1994 with the Federal Election Commission ("FEC") by the Clinton for President Committee. This Response was filed, pursuant to 11 C.F.R. § 9038.1(c)(2) (1994), objecting to an FEC Interim Audit Report conducted pursuant to 26 U.S.C. § 9038 and 11 C.F.R § 9038.1(c)(1). Portions of the allegedly libelous statements were republished by the FEC in its Final Audit Report publicly released on December 27, 1994. The Final Audit Report required the Committee to pay \$1,383,587 to the U.S. Treasury. This statutory audit was preliminary to FEC institution of judicial proceedings pursuant to 26 U.S.C. § 9040 for repayment of amounts identified in the audit.

2. 2 U.S.C. § 437d(c) is controlling and dispositive:

No person shall be subject to civil liability to any person (other than the Commission or the United States) for disclosing information at the request of the [Federal Election] Commission.

This federal statute thus mandates dismissal.

3. Dismissal is also required because the statements at issue are protected by three absolute privileges recognized by courts in the District of Columbia: (1) the absolute privilege governing "communications preliminary to a proposed judicial proceeding"; 1/ (2) the absolute privilege applicable to information

4. 1/ Restatement (Second) of Torts § 587 (emphasis added). See, e.g., Lewis v. Elliott, 628 F. Supp. 512, 516 (D.D.C. 1986) (Oberdorfer, J.); McBride v. Pizza Hut, 658 A.2d 205, 207-08 (D.C. 1995).

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furnished to a federal agency concerning internal revenue matters (the Presidential Primary Matching Payment Account Act, 26 U.S.C. §§ 9031-9042, is codified under the Internal Revenue Code) as to which the Supreme Court has held that such "is a privileged and confidential communication for which no action of libel or slander will lie" 2/ and (3) the absolute privilege with respect to submissions in the District of Columbia by an attorney in the District of Columbia to an agency located in the District of Columbia, as required by statute where the information supplied is to be kept confidential by the agency except as otherwise provided by law. 3/

Dismissal is independently required on Plaintiffs' claim that the isolated statements about an unnamed corporate vendor defamed the individual plaintiffs. This is patently frivolous, since the individual plaintiffs were not mentioned or identified in any way in any of the statements and are not even mentioned once in the entire forty-three page filing. Individual plaintiffs should be dismissed from this action.

Moreover, none of the alleged statements support even a colorable claim for libel by plaintiffs who are limited purpose public figures under Buchanan v. Associated Press, 398 F. Supp. 1196, 1202-03 (D.D.C. 1975). Therefore, dismissal is required against all plaintiffs.

2/ In re Quarles, 158 U.S. 532, 535-36 (1895); see also Mazanderan v. McGranery, 490 A.2d 180, 182 (D.C. 1984).

3/ See, e.g., Goggins v. Hoddes, 265 A.2d 302 (D.C. 1970).

In addition, diversity of citizenship appears to rest solely on the false statement that attorney Utrecht, a partner in the Washington, D.C. law partnership of Oldaker, Ryan & Leonard (with resident partners in Washington, D.C. and Virginia, thereby destroying diversity 4/), was "acting on her own behalf" (Complaint ¶ 19) as well as counsel to the Committee in making the July 6, 1994 filing with the FEC. There is no conceivable factual support for that allegation.

7. Ms. Utrecht's work for the Committee was under the terms of a retainer paid to the Washington, D.C. law firm of Oldaker, Ryan & Leonard. The July 6, 1994 filing was solely "on behalf of" the Committee and not herself. Attempts to manufacture federal diversity jurisdiction by falsely claiming that a legal submission for a client is on the lawyer's own personal behalf, as alleged in paragraph 19 of the Complaint, is an independent jurisdictional ground for dismissal. See Pellegrin & Levine, Chartered v. Antoine, 961 F.2d 277, 278 (D.C. Cir. 1992).

Filed with the Court is a true copy of the July 6, 1994 confidential Response to the FEC by defendant Committee.

CONCLUSION

8. This is a frivolous lawsuit, barred by statute, by a disappointed corporate vendor that unsuccessfully sought employment with the 1996 Committee and filed this lawsuit against the 1992 Committee only after it was not selected to

4/ Carden v. Arkoma Assoc., 494 U.S. 185, 195 (1990).

do similar work in 1996. Because it is barred by 2 U.S.C. § 437d(c), the statements are absolutely precontrolling decisions of the D.C. Court of Appeals and the United States Supreme Court and do not even mention (and therefore cannot defame) corporate plaintiffs, and the complaint conclusorily asserts but lacks claim of actual malice, dismissal is mandatory.

Respectfully submitted,

HOGAN & HARTSON L.L.P.

By: John C. Keeney, Jr.
John C. Keeney, Jr.
D.C. Bar No. 934307

65 Thirteenth Street, N.W.
Washington, D.C. 20004
(202) 637-5600

Attorney for Defendants

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBLA

PUBLIC OFFICE CORPORATION,)
WILLIAM ANDERSON, and)
PATRICIA ANDERSON)
)
Plaintiffs,)
)
v.)
)
CLINTON FOR PRESIDENT)
COMMITTEE, et al.)
)
Defendants.)

Civil Action No. 95-1264 (LFO)

MEMORANDUM IN SUPPORT OF MOTION TO DISMISS

I. CONGRESS HAS EXPRESSLY BARRED THIS ACTION

2 U.S.C. § 437d(c) mandates dismissal of this suit alleging libel of an unnamed corporate vender in the Response of the Clinton for President Committee ("Committee") to the Interim Audit Report of the Federal Election Commission ("FEC") filed July 6, 1994 with the FEC. 2 U.S.C. § 437d(c) provides:

No person shall be subject to civil liability to any person (other than the Commission or the United States) for disclosing information at the request of the [Federal Election] Commission.

This statute is conclusive of this litigation and requires immediate dismissal.

Estate of Cowart v. Nicklos Drilling Co., 112 S. Ct. 2589, 2594 (1992) ("In a

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statutory construction case, the beginning point must be the language of the statute, and when a statute speaks with clarity to an issue judicial inquiry into the statute's meaning, in all but the most extraordinary circumstance, is finished.")

The Presidential Primary Matching Payment Act, 26 U.S.C. § 9031 et seq. "requires the Federal Election Commission . . . to conduct a thorough examination and audit of the campaign finances of every publicly funded candidate after the campaign for the nomination ends." Simon v. Federal Election Commission, 53 F.3d 356, 357 (D.C. Cir. 1995). By letter dated April 1, 1994, the FEC wrote the Committee that

This report is to formally advise you of the findings and recommendations of the Audit staff resulting from the audit of the Clinton for President Committee. You are requested to comply with the recommendations by May 4, 1994. After expiration of the response period and receipt of your response, the Audit staff will present a final audit report to the Commission for approval and subsequent public release. If the recommendations contained in this report are followed, such efforts will be noted in the final audit report. However, adherence to these recommendations will not necessarily preclude the institution of enforcement proceedings with regard to apparent violations of the Federal Election Campaign Act of 1971, as amended. [emphasis added].

* * * *

This letter also will serve to inform you that the notice requirements at 26 U.S.C. § 9038(c) concerning notice of Commission repayment determinations have been satisfied by your receipt of the Commission's interim audit report.

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The accompanying FEC Interim Audit Report at page 30 specifically requested, "within 30 calendar days of service of this report", inter alia,

- Explain and document the function of Public Office Corporation ("POC") with respect to services provided to the Committee . . .

Following an extension of time, the Committee filed with the FEC a formal and confidential Response to the FEC Interim Audit Report on July 6, 1994, as required by 11 C.F.R. § 9038.1(c)(2) ("committee will have an opportunity to submit, in writing, within 30 calendar days after service of the interim report, legal and factual materials disputing or commenting on the contents of the interim report.") Plaintiffs allege libel based upon four phrases about an unnamed vendor at pages 3, 40 and 41 of this forty-three page confidential Response filed by the Committee. Complaint ¶ 21. Plaintiffs also allege that the vendor list and description of function supplied by the Committee "at FEC request" (Complaint ¶ 15) permitted identification of the unnamed corporate vendor referred to in the Committee's Response.

As a matter of law, 11 C.F.R. § 9038.1(c)(2), the Committee's Response to the FEC Interim Audit Report was "at the request of the Commission" within the meaning of 2 U.S.C. § 437d(c). The provision of the vendor list and functions was, as alleged, also "at FEC request" (Complaint ¶ 15) and therefore falls within 2 U.S.C. § 437d(c). This action is barred by statute and must be dismissed.

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II. THE JULY 6, 1994 FILING WITH THE FEC IS ABSOLUTELY PRIVILEGED UNDER THREE SEPARATE COMMON-LAW PRIVILEGES

1. District of Columbia law recognizes an independent absolute privilege for information furnished to a federal agency concerning matters within its jurisdiction. Mazanderan v. McGranerv, 490 A.2d 180, 182 (D.C. 1984). ^{1/} This absolute privilege is an extension to all federal agencies of the absolute privilege constitutionally compelled by In re Quarles, 158 U.S. 532 (1895), holding that it is the right of every citizen to communicate information to the executive branch about a "violation of the internal revenue laws of the United States," id. at 537, and "such information, given by a private citizen, is a privileged and confidential communication for which no action of libel or slander will lie." Id. at 535-36. Supremacy Clause considerations demand absolute privilege from state and local libel laws for submissions to the FEC, particularly since the Presidential Election Campaign Fund Act and the Presidential Primary Matching Payment Account Act are part of the Internal Revenue Code, 26 U.S.C. § 9001 et seq., as to which Quarles is binding and dispositive. Congress has likewise so declared. 2 U.S.C. § 437d(c). District of Columbia law follows Quarles and indeed extends it to other federal

^{1/} District of Columbia law of absolute privilege applies to the statements in the July 6, 1994 Committee Response filed in Washington, D.C. with the Federal Election Commission by an attorney with offices in Washington D.C. Also POC's December 3, 1991 Agreement with the Committee specified in Section VII that all disputes were to be governed by the law of the District of Columbia.

agencies. See Mazanderan, 490 A.2d at 182 (absolute immunity for information supplied to Immigration and Naturalization Service).

2. District of Columbia law recognizes an independent absolute privilege with respect to submissions in the District of Columbia by an attorney in the District of Columbia to an agency located in the District of Columbia, as required by statute where the information supplied is to be kept confidential by the agency except as otherwise provided by law. Goggins v. Hoddes, 265 A.2d 302 (D.C. 1970); see also McBride, 658 A.2d 207-208; Elliott v. Healthcare Corp., 629 A.2d 6, 9 (D.C. 1993). Under 26 U.S.C. § 9033, it is a condition of eligibility to receive FEC funds that a candidate shall in writing "(3) agree to an audit and examination by the Commission under Section 9038 and to pay any amounts required to be paid under such section." Accord. Simon, 53 F.3d at 357; Dukakis, 53 F.3d at 362; Robertson, 45 F.3d 486. Having been required by federal statute to submit to the FEC audit and to respond to the FEC auditors subject to the confidentiality provisions, the absolute privilege of Goggins and its progeny is applicable here.

Plaintiffs attempt to evade this absolute privilege by alleging -- erroneously -- that "this interim audit and its follow-up Committee Response and final audit were part of an informal, non-judicial process." Complaint ¶ 16. Hardly. The audit is required by statute. 26 U.S.C. § 9038; Simon, 53 F.3d at 357. The Interim Audit Report and the opportunity for a Committee Response are required by regulation. 11 C.F.C. § 9038.1(c); see also Simon, 53 F.3d at 358 (Committee's response is "pursuant to 11 C.F.R. § 9038.1(c)(v)(2)"). Plaintiffs apparently rely on

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an outdated case describing old FEC procedures prior to the 1991 regulations, which formalize and require these filings. See Reagan Bush Committee v. Federal Election Commission, 525 F. Supp. 1330, 1334-35 (D.D.C. 1981). The regulations were added in 1991. 56 Fed. Reg. 35945 (July 29, 1991).

3. There is an absolute privilege for attorneys and parties to publish any matter (including alleged or actual defamatory matter) in "communications preliminary to a proposed judicial proceeding." Restatement (Second) of Torts §§ 586 (attorneys) and 587 (parties)(1977)(emphasis supplied). The leading cases applying this Restatement rule in the District of Columbia are Conservative Club of Washington v. Finkelstein, 738 F. Supp. 6, 13-15 (D.D.C. 1990) (applying absolute privilege of Section 586 to lawyer's "communications preliminary to a proposed judicial proceeding" and imposing Rule 11 sanctions on plaintiff) and McBride v. Pizza Hut, 658 A.2d 205, 207-208 (D.C. 1995) (lawyer's response "geared toward avoiding . . . proposed litigation" is absolutely privileged under Section 586). See generally Lewis v. Elliott, 628 F. Supp. 512, 516 (D.D.C. 1986) (absolute privilege for statements made "preliminary to or in the course of a judicial proceeding") (Oberdorfer, J.) (citation omitted; emphasis added); Arneja v. Gildar, 541 A.2d 621, 623 & n.4 (D.C. 1988) (absolute privilege applies to communications "preliminary to a proposed judicial [or administrative] . . . proceeding") (quoting Restatement (Second) of Torts § 586 (1977)).

All statements in the Committee's July 6, 1994 Response to the FEC Interim Audit Report were preliminary to a proposed judicial proceeding under 26

U.S.C. § 9040, and therefore are absolutely privileged under the Restatement as adopted in the District of Columbia. 26 U.S.C. § 9040(b) authorizes the Commission to file suit "to seek recovery of any amounts determined to be payable to the Secretary as a result of an examination and audit made pursuant to Section 9038." Indeed, in 1995 alone, there have been three D.C. Circuit opinions arising out of FEC audits of presidential campaigns. Dukakis v. Federal Election Commission, 53 F.3d 361 (D.C. Cir. 1995); Simon v. Federal Election Commission, 53 F.3d 356 (D.C. Cir. 1995); Robertson v. Federal Election Commission, 45 F.3d 486 (D.C. Cir. 1995).

Litigation by the FEC was more than a bare possibility on July 6, 1994. The FEC Interim Audit Report (served April 1, 1994) found -- incorrectly -- that the Committee had to repay \$4,143,375 in federal matching funds. Id. at 46. The July 6, 1994 Committee Response, pursuant to 11 C.F.R. § 9038.1(c)(2), contended "[f]or the reasons set forth in this response, the Committee disagrees with the auditors' proposed preliminary repayment numbers and contends that they are vastly overstated." Id. at 43. FEC Commissioners subsequently required repayment of only \$1,383,587 -- an amount that was promptly repaid by the Committee.

McBride v. Pizza Hut, 658 A.2d 205 (D.C. 1995) is dispositive and controlling authority from the D.C. Court of Appeals on the scope of the Restatement absolute privilege "preliminary to a proposed judicial proceeding." It held absolutely privileged a lawyer's response to a pre-lawsuit demand letter. The court held:

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Thus, although the September 1, 1993 letter was written before institution of legal proceedings, we conclude as a matter of law, based on the language, that this letter responded to a "communication [] preliminary to a proposed judicial proceeding" under serious consideration. RESTATEMENT (SECOND) OF TORTS § 586; see Conservative Club of Washington, 738 F. Supp. at 14.

14. Id. at 208. Here, the Committee's Response was to much more than a simple demand letter; it was to an official FEC Interim Audit Report, required by federal regulation (11 C.F.R. § 9038.1(c)), seeking a "vastly overstated" repayment of \$4,143,375, pursuant to federal statute which requires the Commission to audit the Committee and to sue to collect overpayments. 26 U.S.C. §§ 9038, 9040. The Committee's Response "sought to provide information geared toward avoiding the proposed litigation." McBride, 658 A.2d at 208. For plaintiffs to allege in Paragraph 19 of the Complaint, as third parties without any factual basis, that litigation was not under serious consideration by the FEC or the Committee is as frivolous as 16. suggesting that an individual's response to an IRS audit claiming four times the amount due is without serious consideration of litigation (by the taxpayer or the IRS or both).

17. In any event, McBride teaches that this issue is to be determined as a matter of law, id. at 208, and that a response to a demand letter is absolutely privileged. The FEC Interim Audit Report with its demand for repayment of \$4,143,375, under specific statutory authority to sue to collect audit amounts and a lengthy history of litigation arising out of FEC audits, e.g., Dukakis, 53 F.3d 361;

Simon, 53 F.3d 356; Robertson, 45 F.3d 486, was much more clearly "preliminary to a proposed judicial proceeding" than the simple demand letter in McBride to which the response was held absolutely privileged.

Judge Sporkin's decision in Conservative Club of Washington v. Finkelstein, 738 F. Supp. 6 (D.D.C. 1990), cited with approval by the D.C. Court of Appeals in McBride, 658 A.2d at 208, likewise compels a finding of absolute privilege. There, plaintiff contended, as does Complaint ¶ 19 here, that there was "no pending litigation at the time of the statements and no proceedings had commenced." Id. at 13. The court, after analyzing comment e to the Restatement (Second) of Torts § 586, rejected this argument, stating "this Court disagrees with plaintiff's narrow reading of the applicable scope of the privilege." Id. The court emphasized: "Here, the statements were made in contemplation of litigation to the very individuals who would have an interest in the outcome of such litigation" and "there is a strong public policy in favor of individuals privately resolving their disputes without resort to the judicial process." Id. at 14.

Moreover, the federal regulatory scheme which requires both the Interim Audit Report and the opportunity for a Committee Response, 11 C.F.R. § 9038.1(c), relies on an adversarial presentation to the Commissioners on the amount of repayment. Judge Sporkin's words are equally applicable here,

To hold an attorney liable for such statements would disrupt the proper functioning of the adversarial process and certainly have a chilling effect on zealous advocacy.

Id. at 14. McBride and Conservative Club of Washington require dismissal.

III. THE INDIVIDUAL PLAINTIFFS AND POC CANNOT HAVE BEEN DEFAMED BY STATEMENTS THAT DID NOT MENTION THEM

Not once in the forty-three page Committee response to the FEC is POC mentioned by name, and the sole reference in the Appendix is in response to a specific FEC question about POC. Nor are POC's principals, plaintiffs William and Patricia Anderson, mentioned at all. It is well established that "the officer of a corporation who is not personally defamed has no right to recover damages for defamation published about the corporation." Elm Medical Laboratory, Inc. v. RKO General Inc., 532 N.E.2d 675, 679 (Mass. 1989); see also Golden Palace, Inc. v. National Broadcasting Co., 386 F. Supp. 107 (D.D.C. 1974) (recognizing distinction between defamation of corporation and defamation of corporate officers), aff'd, 530 F.2d 1094 (D.C. Cir. 1976). Absent any mention of the individual plaintiffs in the statements at issue, there is no basis for alleging that they were defamed and accordingly their claims are frivolous.

The FEC Interim Audit Report on page 30 requested "within 30 calendar days of service of this report":

- In chronological order, list the various computer systems and data entry services used by the Committee. . . .
- Explain and document the function of Public Office Corporation ("POC") with respect to services provided to the Committee. . . .
- For the listed vendors provide the requested information. . . .

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In submitting a single response to all these questions, defendant Committee submitted a three-page Attachment 5 to the Appendix that identified the following computer systems utilization vendors:

1. Malone & Company
2. ICL, Inc.
3. Future Now and Complete Computing
4. POC
5. Great Plains
6. Kerry for President Committee

Based on this Attachment, POC is not readily identifiable as the unnamed computer vendor referred to in the Committee's Response that is the subject of paragraph 21 of the Complaint and in any event POC is not publicly so identified. That POC is not even named in the text of the Committee's Response negates any inference of malice.

IV. NONE OF THE STATEMENTS CAN SERVE AS THE BASIS FOR A LIBEL ACTION

- A. Paragraph 21a Is Absolutely Privileged, True, A Legal Opinion by an Expert on FEC Law, Admitted by Plaintiffs and Not Negligently Made.**

Complaint paragraph 21a alleges that the following two paragraphs (which are also separated by two paragraphs) at pages 40-41 of the Committee's Response to the FEC, are defamatory:

The auditors focused here on whether these contributions were properly redesignated to the Compliance Fund, but, in fact, in order to have been considered primary contributions in the first instance, the

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regulations required that they be designated in writing for the primary. Very few of them were so designated. The Committee's vendor who processed these contributions treated them as "redesignations" even though they were not. That vendor's contract had been negotiated early in the campaign by the Committee's original counsel and included an incentive for the vendor to treat contributions as though additional documentation or affidavit was necessary. Under the contract, the vendor received an additional amount per contribution for which additional documentation or an affidavit was obtained. The Committee staff did not see these contributions until well after the election, but relied solely on the vendor's expertise to handle the contributions appropriately. [emphasis in original]

* * *

In those instances where they were not totally superfluous, the "redesignations" sought and obtained by the Committee's vendor merely served as confirmation that the contributors intended these contributions to be made to the Compliance Fund since there may have been some ambiguity in the way in which the checks were made out or in the unsigned cards that were attached to the checks.

The paragraphs quoted above are true, not defamatory and are a statement of legal opinion by attorney Utrecht, a former FEC attorney and expert adviser on FEC law to numerous Democratic presidential campaigns since serving as Deputy General Counsel to Mondale for President in 1984. Her expert legal conclusion that an unnamed vendor treated contributions as "redesignations" even though they were not" is a statement of legal opinion which cannot support an action for defamation.

21. Even if the plaintiffs had expert witness testimony that the legal opinion were incorrect (they have no such expert witness and the opinion is correct), such a hypothetical difference in legal opinions would not support a cause of action for libel. See Moldea v. New York Times Co., 22 F.3d 310, 313 (D.C. Cir.)

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("interpretation does not present a verifiable issue of fact that can be actionable in defamation"), cert. denied, 115 S. Ct. 202 (1994).

The two immediately preceding full paragraphs at the top of page 40 of the Committee's Response set forth the legal framework that is the subject of the two challenged paragraphs which are in the middle of this closely reasoned fourteen paragraph legal argument. The two paragraphs read as follows:

Under 11 C.F.R. § 110.1(b)(2)(i), a contribution not designated in writing is considered a contribution for the next election after the contribution is made. Thus, contributions received after the date of the primary or nominating convention, as applicable, are considered for the general election. In order to be considered designated in writing for a particular election, a contribution must meet one of the following tests: (1) the check or other negotiable instrument itself must clearly indicate the particular election with respect to which the contribution is made; (2) the contribution must be accompanied by a writing signed by the contributor which clearly indicates the particular election with respect to which the contribution is made; or (3) the contribution is properly redesignated. 11 C.F.R. § 101.1(b)(4).

~~Under 11 C.F.R. § 100.9(a), "election" means a~~
"general" election, "primary" election, "runoff" election, "caucus", "convention" or "special" election. The other relevant regulatory provision to this is 11 C.F.R. § 9003.3(a)(1)(iii) which states in relevant part that "contributions that are made after the beginning of the expenditure report period but which are designated for the primary election...may be redesignated for the legal and accounting compliance fund... Contributions that do not exceed the contributor's limit for the primary election may be redesignated...only if--(A) The contributions represent funds in excess of any amount needed to pay remaining primary expenses; (B) The redesignations are received

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within 60 days of the Treasurer's receipt of the contributions; (C) The requirements of 11 C.F.R. § 110.1 are satisfied; and (D) The contributions have not been submitted for matching." (emphasis in original).

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Id. at 40.

The legal issue addressed in the challenged legal opinion is a threshold issue: whether those contributions had been "designated in writing" for the primary. This threshold issue was admittedly POC's responsibility. POC itself stated on February 23, 1995 that "the contributions to the Clinton '92 campaign were the sole responsibility of POC." POC Memorandum at p. 13 (emphasis added); accord, Complaint ¶¶ 8, 11 (POC responsible for "interacting with contributors and preparing the necessary documentation for filings with the FEC to obtain matching funds under PECFA"). POC also admits -- as it must -- that it had some responsibility for the redesignations, Complaint ¶ 13, last sentence, although it quibbles about the scope of its involvement.

These quibbles are legally immaterial because in this Circuit:

"substantial truth" is a defense to defamation. Moldea (I), 15 F.3d at 1150. "Slight inaccuracies of expression are immaterial provided that the defamatory charge is true in substance." Liberty Lobby v. Dow Jones, 838 F.2d at 1296 (citing RESTATEMENT (SECOND) of Torts § 581A cmt. f (1977); accord Foretich v. CBS, Inc. 619 A.2d 48, 60 (D.C. 1993) (citing Liberty Lobby v. Dow Jones).

Moldea, 22 F.3d at 318.

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In alleging otherwise, the Complaint ignores the October 6, 1992 written apology by plaintiff POC regarding "management of the redesignation of overlimit contributions to GELAC" ^{2/} and the February 23, 1995 written admission by POC that POC "reconciled 30,000 + contributions redesignated to GELAC." Indeed, in POC's Complaint, it now alleges that the "over 30,000 redesignations and the related documentation." Complaint ¶ 13, for which it claimed credit on February 23, 1995, were done by others. History is not so easily rewritten. The Response's statements about the unnamed vendor case are "substantially true" and therefore not actionable. Moldea, 22 F.3d at 319.

B. Paragraph 21b Is Absolutely Privileged, True, and Not Negligently Made Since it Exactly States Paragraphs 4.4 and 4.5 of the December 3, 1991 Agreement with Plaintiff POC

Paragraph 21b of the Complaint alleges specifically that the following statement (already included in paragraph 21a quoting page 40 in the Committee's Response to the FEC) is defamatory:

that vendor's contract . . . included an incentive for the vendor to treat contributions as though additional documentation or affidavit was necessary.

^{2/} GELAC refers to the General Election Legal and Accounting Compliance Fund, also referred to as the Compliance Fund. POC had a cover letter that accompanied the redesignation affidavit POC sent out to contributors over the signature of plaintiff Pat Anderson.

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The next sentence in the Committee's FEC filing, omitted from this paragraph in the Complaint, is: "Under the contract, the vendor received an additional amount per contribution for which additional documentation or an affidavit was obtained."

The sentence complained of in Paragraph 21b of the Complaint accurately states Paragraphs 4.4(b) and (c) and 4.5(b) of the December 3, 1991 Agreement between plaintiff POC and defendant Committee, quoted below:

4.4 The Committee shall pay POC the following fees: (a) \$2.50 for each contribution processed, (b) \$2.00 for each affidavit sent, which fee shall include the cost of a personalized forwarding letter; and (c) \$2.00 for each affidavit executed and returned for submission to the FEC.

4.5 The Committee shall pay POC the following Incentive Fee if any given monthly Matching Funds Submission receives an FEC grade of between 98.0% and 100%, an Incentive Fee equal to (a) an additional \$1.00 per contribution processed in such month plus (b) \$0.50 per affidavit mailed to contributors in such month. . . .

24. Thus, Paragraph 21b of the Complaint is true, known by plaintiffs who signed the contract to be true, and supported by the plain language of the contract. It is not "false and defamatory" (Complaint ¶ 21), "negligent" or "actual malice" (Complaint ¶ 23), for the Committee and its counsel to refer to a fact supported by the exact language of plaintiff's contract. Such "[t]ruth is a complete defense to a claim of defamation" Farrington v. Bureau of National Affairs, Inc. 596 A.2d 58, 59

(D.C. 1991), cert. denied, 504 U.S. 912 (1992). Plaintiffs' allegation in paragraph 21b is frivolous.

C. Paragraph 21c Is Absolutely Privileged, Admitted to Be True by Plaintiffs, and Not Negligently Made.

Paragraph 21c alleges that the following statement at page 3 of the Committee's Response to the FEC is defamatory:

These misstatements were essentially due to errors by one of the Committee's computer vendors who failed to reconcile her records to the accounting data and bank reconciliation provided to her by the Committee's accounting department.

The Complaint omits the caption and preceding sentence which is essential to the context:

A. Misstatement of Financial Activity

The auditors found discrepancies in the Primary Committee's beginning balance, receipts, disbursements and ending balance, all of which were materially corrected by amendments, filed on July 2, 1993.

Thus the sentence in Paragraph 21c has nothing to do with "redesignations," but responds directly to this finding by the FEC "auditors." Such FEC filings were POC's responsibility. Complaint, ¶ 8, 11. Defendant Committee corrected these misstatements by amendments filed with the FEC on July 2, 1993.

POC's effort not solely Committee effort

By letter dated July 9, 1993 from plaintiff POC, signed by POC's chairman William R. Anderson, to attorney Utrecht at her law office at Oldaker Ryan & Leonard, POC apologized for its error. POC stated:

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2) issue re: July 1992 report overstated by \$200,000.

We believe this to be the result of a typographical error which was not caught in time to correct before report submission. We regret this. There were no charges for correcting the error.

Because the written apology of plaintiff POC signed by plaintiff William Anderson admitted the "error," they cannot now be heard to complain that the Committee's Response also used the term "error." Thus, Paragraph 21c is true, supported by FEC findings, subsequent Committee amendments to FEC filings and corporate plaintiff's apology signed by plaintiff William Anderson, and in any event is not even arguably made with negligence or malice.

Plaintiffs do not and cannot assert a single fact in support of their conclusory allegation that Paragraph 21c is in any way false. To the contrary, Paragraph 11 of the Complaint admits that POC's work "consisted of, inter alia, interacting with contributors and preparing the necessary documentation for filings with the FEC to obtain matching funds under PECFA" and chairman Anderson apologized for what he termed POC's "error."

Because the FEC Interim Audit Report at page 4 used the caption "A. Misstatement of Financial Activity," the Committee used the same caption and the FEC's term "misstatements." The FEC Interim Audit Report further stated at page 5 that "the Audit staff was unable to identify the reasons for the misstatements described above." In direct response, the Committee submitted the sentence that is the subject of paragraph 21c of the Complaint to identify the reasons for what the

FEC termed "misstatements." As a matter of law, once the Interim Audit Report by the FEC is found to be "official," an accurate publication of terms used in it is also privileged irrespective of the veracity of the FEC's use of the term "misstatements." Harper v. Walters, 822 F. Supp. 817, 826 (D.D.C. 1993), aff'd, 40 F.3d 474 (D.C. Cir. 1994).

What plaintiffs now appear to object to in Paragraph 21c of the complaint is that the FEC Interim Audit found misstatements in FEC filings prepared by corporate plaintiff and the Committee had to amend these FEC filings. Despite their written apology for their "error," which was properly relied upon by the Committee and its counsel in the July 6, 1994 Response one year later, plaintiffs now wish to litigate, in the guise of a libel action against the Committee and its attorney, whether the FEC's Audit findings were correct and whether defendant Committee acted correctly in filing amended FEC filings to correct plaintiffs admitted "error" in FEC filings prepared by plaintiff POC. This is neither the right forum nor proper procedural vehicle to relitigate hypothetical, moot and frivolous issues about the admitted "errors" of pre-amended filings.

In order to prove libel, plaintiffs must prove that a statement is false, and that this statement was negligently made by the Committee and its attorneys; Reuber v. Food Chemical News, 750 F.2d 1039, 1060 n.31 (D.C. Cir. 1984) (subsequent history omitted); and, because plaintiffs are limited purpose public

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figures for purposes of FEC filings for the Committee, ^{3/} they must further prove, by clear and convincing evidence, that the statement was maliciously made. Thomas v. News World Communications, 681 F. Supp. 55, 65 (D.D.C. 1988). The Complaint simply does not -- and could not -- allege any factual basis for these required elements. The FEC found misstatements in filings prepared by plaintiff POC; the defendant Committee corrected the misstatements by amended filings with the FEC and told the FEC that it had done so in its Response. Plaintiffs POC and William Anderson admitted the "error." There is no falsity, libel, negligence or actual malice under any conceivable stretch of facts.

D. Paragraph 21d Is Absolutely Privileged, True, Not Negligently Made And A Statement Of Opinion Which As A Matter Of Law Cannot Be Defamatory.

In a highly misleading editing, paragraph 21d of the Complaint alleges that the following portion of the statement on page 3 in the Committee's Response to the FEC is defamatory:

errors [occurred during June, July and August, 1992, and] during this period, the Committee experienced significant difficulties with the vendor preparing the Committee's reports.

The context of this Response is the requirement at 2 U.S.C.

§ 434(b)(3)(A) to disclose certain identification about each contributor of \$200 or

^{3/} Buchanan v. Associated Press, 398 F. Supp. 1196, 1202-3 (D.D.C. 1975) (accountant whose firm had been retained to perform accounting services for finance committee to reelect the president was a limited purpose public figure for purposes of those services); see Waldbaum v. Fairchild Publications, Inc., 627 F.2d 1287, 1296-98 (D.C. Cir.), cert. denied, 449 U.S. 898 (1980).

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more within the calendar year and the FEC's finding that "during a sample review of Committee contributions it was noted that 8% of contributions from individuals that required disclosure on schedules A-P were not itemized." FEC Interim Audit Report at 5.

The Complaint's selective quotation from the Committee's Response to the FEC so edits the text as to alter its plain meaning. It has nothing to do with "redesignations." The full text (with the excerpt quoted in the Complaint underlined) is at page 3 of the Response:

The auditors performed a sample review of Primary Committee contributions and apparently identified 26 contributions that were not itemized as required. On the basis of this sample, the auditors projected that 8% of the Committee's individual contributions that required disclosure were not itemized.

On July 2, 1993, the Primary Committee filed amended reports which materially corrected the itemization omissions identified by the auditors and therefore no further action is recommended in the audit report. However, the Committee notes that it does not agree with the auditors' results projecting itemization errors of 8%. The Committee further notes that many of the errors occurred during June, July, and August of 1992. During this period, the Committee experienced significant difficulties with the vendor preparing the Primary Committee's reports.

The "errors" referred to in this passage are itemization errors found by the FEC in its sample review at page 5 of its Interim Audit Report. "Errors" is the FEC's term in its official Interim Audit Report and the Committee was absolutely privileged to use that term in the Response, irrespective of the veracity of the FEC's use. Harper, 822 F. Supp. at 826. It is also indisputably true that many of these errors found by the FEC "occurred during June, July, and August of 1992." The

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FEC Interim Audit Report so states at page 5 ("In addition, 17 of the sample errors involved contributions received in the June, July and August 1992 reporting period").

The Committee on July 2, 1993 filed amended disclosure reports. As found by the FEC Interim Audit Report at page 6, "[t]hese amended reports materially corrected the irregularities noted above."

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These FEC - found "errors" were solely corporate plaintiff's responsibility. Paragraph 11 of the Complaint so admits that POC's work "consisted of, inter alia, interacting with contributors, and preparing the necessary documentation for filings with the FEC to obtain matching funds under PECFA."

It is also true and beyond genuine dispute that "during this period, the Committee experienced significant difficulties with the vendor preparing the Primary Committee's Report." The errors found by the FEC and the Committee's filing of amended disclosures with the FEC exemplify in part the difficulties. In any event, the Committee's experience of significant difficulties is a statement of opinion that is not subject to libel or defamation laws. Liberty Lobby, Inc. v. Dow Jones & Co., Inc., 838 F.2d 1287, 1300 (D.C. Cir.) (statements of opinion "dependent upon personal perspective" are not actionable as a matter of law), cert. denied, 488 U.S. 825 (1988).

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V. **PLAINTIFFS ARE PUBLIC FIGURES THAT HAVE NOT ALLEGED FACTS SUPPORTING THEIR ALLEGATION OF ACTUAL MALICE**

Plaintiffs cannot claim to be private individuals; both POC and its individual owners are "public figures," defined, for the purposes of libel law, as those who "have thrust themselves to the forefront of particular public controversies in order to influence the resolution of the issues involved [T]hey invite attention and comment." Gertz v. Robert Welch, Inc., 418 U.S. 323, 345 (1974). For example, paragraph 8 of the complaint alleges that "POC is in the business of providing data processing, data management and other support services for political campaigns and in providing presidential campaigns with services necessary to obtain federal matching funds under PECFA."

In this context, POC has deliberately interjected itself, for profit, into a regulatory scheme where "the Act requires the Federal Election Commission ("the Commission" or "FEC") to conduct a thorough examination and audit of the campaign finances of every publicly funded candidate after the campaign for the nomination ends. 26 U.S.C. § 9038(a); 11 C.F.R. § 9038.1 (1995)." Simon v. Federal Election Commission, 53 F.3d 356, 357 (D.C. Cir. 1995). Part of the FEC audit process is the preparation and public release of a final audit report required by 11 C.F.R. § 9038.1(d) & (e). Having chosen to thrust themselves into the forefront of providing presidential campaigns with services necessary to obtain the federal matching funds, which will subsequently be audited by the FEC, plaintiffs are limited purpose public figures with respect to financing of presidential campaigns.

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This Court has previously so held. Buchanan v. Associated Press, 396 F. Supp. at 1202-03 (accountant for accounting firm for presidential reelection committee).

Waldbaum, 627 F.2d 1296-98, sets forth the three part test for determination of a limited purpose public figure. As the first step, "the court must isolate the public controversy." Id. at 1296. Here, as in Buchanan, 398 F. Supp. 1202, "the controversy over the financing of the campaign for the election of the United States President was a matter of the greatest public concern." The mandatory FEC audit and the accompanying press coverage ^{4/} identify the public controversy. The second step is to analyze the plaintiffs' role in the controversy. Waldbaum, 627 F.2d 1297. Here, as in Buchanan, 398 F. Supp. 1202, plaintiffs were involved in accounting for various campaign finance transactions relating to the election of the United States President. Indeed, plaintiffs "willingly accepted" this role, Buchanan, 398 F. Supp. 1203, including making the filings with the FEC for federal matching funds that are required by statute to be audited by the FEC. The third and final step is that "the alleged defamation must have been germane to the plaintiff's participation in the controversy." Waldbaum, 627 F.2d 1298. Here the alleged defamation arises directly out of corporate plaintiff's preparation of FEC filings that were the subject of the FEC audit and the Committee's Response thereto.

^{4/} See, e.g. Associated Press article "Accounting for All Those Political Dollars" (August 3, 1992).

An identical analysis applies to the individual plaintiffs. Even though neither was personally mentioned in the Committee's July 6, 1994 Response (and his and her claims should be dismissed because neither was personally defamed by reference to an unnamed corporate vendor), both are limited purpose public figures to the extent that their libel claim rests on their status as "founders and co-principals." Complaint ¶ 9. Both stand in precisely the same position as Mr. Buchanan in Buchanan, 398 F. Supp. 1198, who was the principal shareholder and president of the firm retained by the presidential committee and was held to be a limited purpose public figure.

Thus, in order to maintain a libel claim against defendant Committee or its attorney, plaintiffs would need to show, by clear and convincing evidence (1) that the statements at issue were false, (2) that the Committee and its attorney made those statements with "actual malice," that is, with knowledge that [they were] false or with reckless disregard of whether [they were] false or not." New York Times v. Sullivan, 376 U.S. 254, 280 (1964). Here as in Thomas, 681 F. Supp. at 65, "the complaint asserts but does not support an allegation of actual malice." Here, as in Thomas, "the complaint lacks any colorable claim" that defendant Committee or its counsel published the challenged statements with actual malice. Id. This is particularly the case where none of the challenged statements mentioned POC by name and the individual plaintiffs are not mentioned at all in the 43-page confidential filing with the Federal Election Commission. Accordingly, defendants respectfully request that this Court grant the motion to dismiss on the

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additional grounds of failure to allege facts sufficient to state a claim of actual malice, by clear and convincing evidence, which is a necessary element of libel in any lawsuit by these limited purpose public figures.

Conclusion

For the foregoing reasons, defendants respectfully request that their motion be granted.

Respectfully submitted,

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

9/27/95

PUBLIC OFFICE CORPORATION, et. al.)
Plaintiffs,)
v.)
CLINTON for PRESIDENT COMMITTEE (1992),)
et. al.)
Defendants.)

C.A. 95-1264 (TFH/PJA)

Plaintiffs' Opposition to Defendants' Motion to Dismiss

Plaintiffs request oral argument in accordance with Rule 108(f) of this Court's Rules.

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*Denotes principal authority.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

PUBLIC OFFICE CORPORATION, et. al.
Plaintiffs,

v.

CLINTON for PRESIDENT COMMITTEE (1992),
et. al.
Defendants.

C.A. 95-1264 (TFH/PJA)

Plaintiffs' Memorandum in Opposition to Motion to Dismiss

I. Introduction

This is an action for libel. The complaint is Exhibit 1. Plaintiff Public Office Corporation ("POC") was a contractor to the defendant for the 1992 primary. Defendants made the defamatory statements in a response ("the Committee Response") submitted to Federal Election Commission ("FEC") auditors after the auditors gave defendants an interim audit report. Following their regular practice, the auditors included the defamatory statements in the final audit report, a public document, which contained an attachment clearly identifying POC as the target of the defamatory statements.¹ In the most damaging of the defamatory

¹ *The Committee Response is Exhibit 1 to the Motion to Dismiss. The FEC Audit Division's final report on the Defendant Committee is Exhibit 2 to this Opposition. The FEC Audit Division's final report on the Clinton/Gore General Election Committee and Compliance Fund, which repeats the most damaging of the defamatory statements, is Exhibit 3 to this Opposition. The defendants are responsible for these repetitions of the defamatory statements since "[t]he maker of a [defamatory] statement may be held accountable for its republication if*

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statements, defendants falsely accuse POC of undertaking a massive letter writing campaign in violation of FEC regulations – allegedly kept secret from the Committee and done to improperly inflate POC’s fees – to get over 30,000 primary contributors to “redesignate” their contributions to the general election compliance fund.

Defendants’ primary response to the complaint is to counter that it is barred by four absolute privileges. While some of these privileges are recognized in the law, they have no application to this case. To understand why this so necessitates a rather close examination of the statutes and rules governing the FEC and its procedures for reviewing matching fund payments, because the audit procedures, in particular, demonstrate that none of the privileges apply to the defamatory statements made in the response.

II Argument

A. The FEC and Matching Fund Review Procedures

The FEC is established under the Federal Election Campaign Act (“FECA”), 2 U.S.C. §431 *et seq.* As defined by that statute, “the Commission” (i.e., the FEC) is composed of six presidentially appointed members. 2 U.S.C. §437c.² It is given subpoena powers under 2

such republication was reasonably foreseeable.” Tavoulareas v. Piro, 759 F.2d 90, 136, n. 56 (D.C. Cir. 1985), vacated and superceded on other grounds by en banc court, 817 F.2d 762 (D.C. Cir. 1987); Ingber v. Ross, 479 A.2d 1256, 1269 (D.C. App. 1984); Restatement (Second) of Torts §576 (1977).

² *The court of appeals found the presence of two non-voting ex officio Congressional designee members objectionable in FEC v. NRA Political Victory Fund, 6 F.3d 821 (D.C. Cir. 1993), cert dismissed, ___ U.S. ___, 115 S. Ct. 537, 130 L. Ed 2d 439 (1995).*

U.S.C. §437 d(a)-(c).

The subject of presidential campaign matching funds is governed by two other statutes. Matching funds, which are under FEC jurisdiction, are covered for general elections by the Presidential Election Campaign Funding Act ("PECFA") and for primary campaigns by the Presidential Primary Matching Payment Act ("PPMPA").³ Both PECFA and PPMPA have parallel audit requirements for campaign committees. See 26 U.S.C. §9007 (PECFA) and 26 U.S.C. §9038 (PPMPA). In both statutes, the authority of FEC's audit staff to conduct audits of campaign committees stems, not from FEC's subpoena power, but from the statutory requirements that the Committee "agree to an audit and examination" as a condition of eligibility to receive payments. 26 U.S.C. 9003 (a)(3) (PECFA), §9033 (a)(3) (PPMPA).

The audit procedures employed by FEC's audit staff under both PECFA and PPMPA are parallel. They are explained at some length in Reagan Bush Comm. v. FEC, ("Reagan Bush"), 525 F.Supp. 1330 (D.D.C. 1981)(PECFA)⁴; Carter/Mondale Presidential Committee v. FEC ("Carter/Mondale"), 711 F.2d 279 (D.C. Cir. 1983), and Simon v. FEC, ("Simon"), 53 F.3d 356 (D.C. Cir. 1995). FEC's audit staff ordinarily commences its audit with "field work...conducted at a site provided by the [campaign] committee." 11 CFR §9038.1 (b)(1). The committee is required to provide FEC audit staff with the necessary records, and, if it

³ *PPMPA is primarily in issue in this case, because the defamatory statements were made in a document in an audit of a primary campaign committee. The reference in ¶11 of the complaint to PECFA is in error, as the proper reference is to the PPMPA.*

⁴ *When Reagan Bush was decided, the procedures were governed by practice, whereas they are now covered by FEC-adopted regulations. See 11 CFR 9038.1 - 9038.5 (audits under PPMPA).*

fails to do so, FEC may issue an order or a subpoena. 11 CFR §9038.1(b)(1)(v). After completing its fieldwork, the FEC "staff will hold an exit conference to discuss with committee's representatives the staff's preliminary findings and recommendations..." 11 CFR §9038.1 (b)(2) (iii). After the audit division completes its fieldwork, it "will issue an interim report to the candidate and his or her authorized committee...[which]...may contain commission findings and recommendations" in several areas, including "[p]reliminary calculations regarding future repayments to the United States Treasury." 11 CFR §9038.1(c)(1)(v). The Court of Appeals recently stated that "[t]he interim audit report is no more than its name implies, a progress report of the continuing audit." *Simon*, *supra* 53 F.3d at 359.⁵

After receiving the interim audit report, the committee "will have an opportunity to submit, in writing... legal and factual materials disputing or commenting on the contents of the interim report." 11 CFR §9038.1(c)(2). This is the Committee Response. The FEC makes it available to the general public.⁶ FEC considers the committee response and then issues an "audit report to be released to the public" whose contents "may differ from that of the interim audit..." 11 CFR §9038.1(c)(3). This audit report "will contain an initial repayment determination made by [FEC]... in lieu of the preliminary calculations set forth in the interim report." 11 CFR §9038.1 (d).

⁵ The court of appeals also stated that "[t]he interim audit report does not even purport to notify the candidate of the amount she or he will be required to repay." 53 F.3d at 359.

⁶ See Exhibit 4 (Wichlacz declaration).

Repayment determinations are to be made by FEC by giving notice to the committee. 11 CFR §9038.2. See generally Simon, *supra*. The procedure is for notice of the FEC's initial repayment determination to be contained in the publicly released audit report. 11 CFR §9038.2(c)(1). If the candidate disputes the initial repayment determination, the procedure is for the candidate first to submit written legal and factual materials, 11 CFR §9038.2(c)(2), and then to request an opportunity to argue these points in open session of FEC. 11 CFR §9038.2(c)(3). Thereafter, FEC makes a final determination of repayment with a written statement of the Commission's reasons for its actions. 11 CFR §9038.2(c)(4).⁷ If a candidate or committee is unhappy with FEC's final determination, it "may file a petition for rehearing of a final repayment determination." 11 CFR §9038.2 (h), §9038.5. A candidate still unhappy with FEC's action after rehearing may appeal to the United States Court of Appeals for the District of Columbia Circuit. 26 U.S.C. §9041(a). If the candidate or committee does not make repayment as required by FEC's final determination, FEC has the right to sue the candidate or committee in United States District Court to recover the amount of the repayment. 26 U.S.C. §9040(b).

B. The Immunity of 2 U.S.C. §437d(c)

Section 437 d(c), part of FECA, states that "[n]o person shall be subject to civil

⁷ In Simon and Dukakis v. FEC, 53 F.3d 361 (DC Cir. 1995), the court of appeals held that it was this final repayment determination which constituted the notification required within 3 years of the end of a primary campaign as a prerequisite to FEC recovery of repayment under PMPA. The court of appeals also held that the contents of the interim audit report were not a "notification" under PMPA.

liability to any person (other than [FEC] or the United States) for disclosing information at the request of [FEC].” Defendants claim the defamatory statements contained in the Committee Response are absolutely privileged by this section. Their position is invalid because (1) neither the Committee Response nor the defamatory statements were supplied “at the request of” FEC, (2) to fall under §437d(c), a request must be “of the Commission,” and a routine staff audit matter, such as an interim audit report, does not stem from the Commission, (3) the “request” covered by §437d(c) is a request for information under §437d (a) or (b), not an interim audit report, and (4) the Committee response was supplied not pursuant to §437d of FECA but under an entirely different statutory and regulatory scheme, namely, PMPA and, as a result, is not governed by §437d.

1. The Defamatory Statements were not “At The Request Of” FEC

As noted above, a committee response to an interim audit is neither required nor sought by FEC. Rather, FEC’s rules simply provide that, after receiving the interim audit report,⁸ a committee “...will have an opportunity to submit.. legal and factual materials disputing or commenting on the contents of the interim report.” 11 CFR §9038.1(c)(2). FEC’s audit staff, of course, does have authority to request information of a committee, but that is part of the fieldwork process, and the rules provide a formal process to resolve disputes over “documentation sought” by the audit staff. 11 CFR §9038.1(b)(1)(iv).

⁸ Which, as noted at p. 4, *supra*, the Court of Appeals has referred to as nothing more than “... a progress report of the continuing audit.”

As pointed out in the complaint, during the fieldwork portion of the audit, the audit staff asked for and received from defendants a descriptive listing of the defendants' computer vendors.⁹ The listing provided identifies and describes POC and the functions it performed, and it is attached to the publicly released final audit report on the Defendant Committee.¹⁰ It clearly identifies POC as the provider of the services which are the subject of the defamatory statements contained in the Committee Response. It is the Committee Response, however, which defames the plaintiffs, not the vendor list.¹¹ By both rule and practice,¹² the interim audit report is not a "request" for information.¹³

2. An Interim Audit Report is not "of the Commission"

The language of §437d(c) is very precise and immunizes only information supplied at the request "of the Commission." "The Commission" is defined in §437c; it consists of "the

⁹ Complaint ¶15 (Exhibit 1).

¹⁰ Exhibit 2, Attachment 5.

¹¹ The specific details of each defamatory statement will be discussed *infra* at pp.21-23.

¹² The language in CFR §9038.1(c)(2) that the committee "will have an opportunity" to submit a response mirrors historic FEC practice. See *Reagan Bush, supra*, 525 F. Supp. at 1334-35 ("an interim audit report, not required by statute or regulation [*Reagan Bush* predates the formal rules] is presented to each candidate's campaign committee, with an opportunity to respond thereto...").

¹³ It should be noted that the interim audit report is not in the record in this case. Plaintiffs are aware of nothing in that document which makes inquiry of the Committee on the specific issues which are the subject of the defamatory statements in the Committee Response, nor do defendants, who otherwise purport to quote from documents not in the record, quote from any language in the interim audit report making any such inquiry.

Secretary of the Senate and the Clerk of the House of Representatives or their designees, ex officio and without the right to vote,¹⁴ and six members appointed by the president, with the advice and consent of the Senate.” The audit staff is not “the Commission.”¹⁵ Nothing in the statute authorizes the audit staff to give a committee an “immunity bath.” This does not mean that the Commissioners are restricted to personally asking questions and requesting information; on the contrary, they can make staff requests their own by specifically authorizing others to act in the Commission’s stead. See, e.g., Jones v. Unknown Agents of FEC, 613 F.2d 864, 867 (D.C. Cir. 1979)(staff members seek authority of commissioners to conduct field interviews and FEC Secretary certifies that staff recommendation to do so has been adopted after review by the commissioners). In this case, there is no indication that the commissioners ever considered the audit staff’s interim audit, let alone any alleged requests for information on the specific subjects of the defamatory statements.

3. The Privilege Covers Only Information Sought under §437d(a) and (b)

Section 437d provides an integrated procedure for the Commission to formally seek information, of which the immunity of subsection (c) is part. Subsection (a) authorizes FEC , inter alia, to require by order persons to submit sworn written reports and answers to questions and to require attendance and testimony by subpoena. Subsection (b) authorizes United States

¹⁴ *But see NRA, supra n.2.*

¹⁵ §437c(f)(1) authorizes the Commission to appoint a staff director and authorizes the staff director to appoint additional personnel. It does not suggest that those personnel are “the Commission.”

District Courts to require compliance with such orders or subpoenas. The immunity provision contained in subsection (c) implements that scheme; it simply means that persons supplying information in accordance with a subsection (a) order or subpoena is immunized from civil liability.

This interpretation fits well with the real meaning of section 437d(a). Since FEC orders and subpoenas are not self-implementing, they are no more than FEC's official request for information; only a U.S. District Court can compel the recipient to provide the information.¹⁶ Lacking the power to compel, the Commissioners can entice compliance by civil immunity.

4. The Privilege of §437d(c) does not apply to a Request under PMPA.

There is no reason to believe Congress would have thought it necessary for the §437 d(c) immunity to apply to information sought by the audit process, because there is an effective alternative mechanism to require candidates' committees to supply requested information in the audit process, namely, the requirement that they agree in writing to the audit as a precondition to receiving federal matching funds. Under FECA, Congress provided a mechanism for FEC to obtain the necessary information to discharge its various

¹⁶ *There are no pertinent court interpretations of §437d(b). It is similar to the order and subpoena enforcement provisions of the Federal Trade Commission Act. ("FTCA"). See FEC v. Comm. to Elect La Rouche, 613 F.2d 849, 854 (D.C.Cir. 1979). Under FTCA, the Commission's order or subpoena is not self executing, but is a request to the District Court, in its discretion, to enforce. See Mississippi Road Supply Co. v. Walling, 136 F.2d 391, 394 (5th Cir. 1943) ("The language is permissive, not mandatory.").*

responsibilities.¹⁷ The mechanism for determining whether a candidate has properly accounted for matching funds, however, is not investigation, subpoena and order. Instead, Congress chose under PECFA and PPMPA to require audits, and FEC, by regulation, has established a regime which includes required record keeping by candidates and FEC's audit staff's right to access to required records to audit the campaign. PECFA and PPMPA audits are not part of the information gathering process of §437d, and, in using the audit procedures to obtain information, FEC staff does not invoke the immunity of §437d(c).

C. The Attorney's Privilege

All states afford an absolute privilege to attorneys publishing information in the course of judicial proceedings, and some jurisdictions, including the District of Columbia, extend this privilege to some attorney statements made prior to the institution of formal judicial proceedings.¹⁸ These jurisdictions follow the rule adopted in the Restatement (Second) of Torts §586, which extends the absolute privilege to "... defamatory matter concerning another in communications preliminary to a proposed judicial proceeding, or in the institution of, or during the course and as part of, a judicial proceeding... (emphasis supplied)." Under this basic rule, a considerable body of law has developed on which kinds of extra-judicial attorney statements are privileged and which kinds are not. See generally Green Acres Trust Co. v.

¹⁷ For example, investigation of candidates' eligibility to receive federal funds. See., e.g. Jones v. Unknown Agents of FEC, supra.

¹⁸ See generally Annotation, Privileged Attorney Statements-Defamation, 23 ALR 4th 932 (1983 and 1995 supplement).

London, 688 P.2d 617, 622-623 (Ariz. 1984) (cataloging cases and excluding press conference statements from the privilege); Trenfel v. Jasper, 16 Cal. Rptr. 2d 913 (Cal. App. 1993.). Certain categories of attorney statements, such as demand letters¹⁹ and responses to demand letters,²⁰ fall within the privilege, while statements more remote from the proposed litigation do not.²¹ This is explained in Comment e to Restatement (Second) §586:

[The] rule stated in this Section applies only when the communication has some relation to a proceeding that is contemplated in good faith and under serious consideration. The bare possibility that a proceeding might be instituted is not to be used as a cloak to provide immunity for defamation when the possibility is not seriously considered.

The District of Columbia cases line up precisely with this Restatement (Second) comment. See, e.g., McBride, *supra* (statement in response to demand letter); Conservative Club v. Finkelstein, 738 F. Supp.6 (DDC 1990) (Sporkin, J) (statements during pre-litigation settlement negotiations, court adopting Comment e to Restatement (Second) §586 at pp. 13-14); Ameja v. Gildar, 541 A.2d 621(D.C. App. 1988)(discussion in hearing room); Lewis v.

¹⁹ See, e.g., Chard v. Calton, 277 Or. 109, 559 P. 2d 1280 (1977).

²⁰ See, e.g., McBride v. Pizza Hut, Inc. (McBride), 658 A.2d 205 (D.C. App. 1995).

²¹ See, e.g., Troutman v. Erlandson, 286 Or. 3,8, 593 P.2d 793, 795 (1979)(statement must have a "close or direct" relationship to the proceedings).

Elliott, 628 F. Supp. 512 (DDC 1986) (Oberdorfer, J.)(statements appended to bid protest).²²

By contrast the Committee's Response is not analogous to any situation in which the attorney's privilege has been sustained, because proceedings were only a "bare possibility" and not "contemplated in good faith and under serious consideration..." As discussed above, the FEC Audit Division's interim report is "...no more than ...a progress report of the continuing audit." Simon, *supra*, 53 F.3d at 359. It could not constitute a demand for payment, because only the Commissioners, by vote, can make such a demand. As a result, the Committee Response cannot be analogized to the demand response in McBride. Moreover, the Defendant Committee was not itself threatening suit; as the party who received the PPMPA payments, it was not seeking money but only in the early stages of making arguments to persuade the auditors that they should not recommend to the Commissioners that they seek repayment.

That the Committee Response was remote from any judicial or quasi-judicial proceedings can be seen from the FEC procedures discussed in Section A. First, there is an audit. The defamatory statements were made during the audit process. Then, when the audit is finalized, the Commissioners decide whether to adopt and release it. Only then has the Commission taken a position. The campaign organization is then given a chance to file written comments with the Commission and to seek oral argument. If the Commissioners still

²² *The last two cases involve attorney statements appended to administrative, rather than court, proceedings. As discussed in §D, infra, administrative proceedings are given the same privileges as court cases in the District of Columbia, provided they are "quasi-judicial" in nature, which is not the case here.*

wish to seek repayment, the campaign organization may seek rehearing. Only then is the case ripe for a judicial or quasi-judicial proceeding, either by judicial review in the Court of Appeals (26 U.S.C § 9041) or by FEC lawsuit against the campaign organization (26 U.S.C. §9040(b)). At the earliest, FEC's adoption and public release of the final audit report can constitute a demand for payment or a determination that a judicial proceeding is contemplated. Accord, Simon and Dukakis, supra (FEC notification is the final repayment determination following candidate's written comments to Commissioners and oral presentations); Carter/Mondale, supra (final repayment determination of Commission triggers judicial review). Given its potentially defensive posture, the defendant Committee's utterances could only be in contemplation of judicial proceedings after a Commission repayment determination.

D. The Quasi-Judicial Privilege

The heart of this motion is really about whether the audit proceedings were a quasi-judicial administrative proceeding, in which case the absolute privilege would apply. It should be obvious from the procedures reviewed above,²³ however, that they are not.

As discussed above, the District of Columbia follows the Restatement (Second) §586, which makes absolutely privileged defamatory statements by an attorney or party "...during the course of and as a part of, a judicial proceeding in which he participates..." and this rule extends to certain quasi-judicial administrative proceedings, as well. See McBride, supra, 658

²³ See Section A, *supra*.

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A. 2d at 207 (Unemployment Compensation Board); Elliott v. Healthcare Corp., 629 A.2d 6 (D.C. App. 1993) (Unemployment Compensation Board); Arneja v. Gildar, *supra*, 541 A.2d 621, 623 (hearing on motion for summary judgment before Rental Accommodations Agency); Mazendaran v. McGranery, 490 A.2d 180, 181-182 (D.C. App. 1984) (license revocation hearing at Hacker's License Appeal Board; court states "[t]he application of absolute privilege has been extended to encompass quasi-judicial proceedings conducted by administrative bodies...."); Goggins v. Hoddes, 265 A.2d 302 (D.C. App. 1970)(Unemployment Compensation Board). See also Lewis v. Elliott, *supra*, 628 F.Supp. at 516 (bid protest proceeding). By contrast, defamatory statements made before administrative agencies whose functions are not quasi-judicial are granted only a conditional or qualified privilege. See generally Elder v. Holland, 208 Va. 15, 155 S.E. 2d 369, 374 (1967)(police departmental hearing); Engelmohr v. Bache, 66 Wash. 2d 103, 401 P. 2d 346(1965)(public hearing of SEC-appointed study group); Fedderwitz v. Lamb, 25 S.E. 2d 414, 417 (Ga. 1943)(collecting cases). Accord, Mosrie v. Trussell ("Mosrie"), 467 A.2d 475 (D.C. App. 1983)(qualified privilege applied to statements to police departmental hearing).²⁴

Prosser's "test" for the quasi judicial privilege states that it applies to administrative bodies "...so far as they have powers of discretion in applying the law to the facts which are

²⁴ Mosrie states the criteria for when a qualified privilege is lost, i.e., abuse of the privilege. It notes that the existence of the privilege is a question of law for the court, but "...whether it was abused by the defendant is a question of fact for the jury." 467 A.2d at 477. As will be discussed *infra*, defendants have not taken the necessary procedural steps to test the evidence on qualified privilege, the loss of which, "in substance comes down to the equivalent of bad faith," *Id.*, which as explained *infra*, plaintiffs will prove.

regarded as judicial, or 'quasi-judicial,' in character."²⁵

The clearest statement of the prerequisites to finding an administrative proceeding quasi-judicial can be found in Baravoti v. Josephthal, Lyon and Ross, Inc., 834 F. Supp. 1023 1028 (N.D. Ill. 1993). The court stated that judicial functions "involve the power to determine legal rights and affect the status of those who appear before the adjudicating body," and "...six powers have been identified to distinguish quasi-judicial bodies from those merely performing an administrative function." They are:

- (1) [t]he power to exercise judgement and discretion;
- (2) the power to hear and determine or to ascertain facts and decide;
- (3) the power to make binding orders and judgments
- (4) the power to affect the personal or property rights of private persons;
- (5) the power to examine witnesses, and to hear the litigation issues on a hearing; and
- (6) the power to enforce decisions and impose penalties.

834 F. Supp. at 1028.

It seems obvious that the Committee Response was not submitted as part of a quasi-judicial proceeding. The FEC's audit division, it was noted, had simply issued the interim audit as a progress report of the continuing audit, Simon, supra, to which the Committee was

²⁵ *Prosser and Keeton, Torts at 819 (5th ed. 1988)*. It should be noted that, "[w]hen an agency at times exercises quasi-judicial functions and at times exercises nonquasi-judicial authority, the absolute privilege for judicial proceedings will apply only when the agency performs in its judicial capacity." *R. Smolla, Law of Defamation §8.03[3][a] at 8-11 (Clark Boardman ed. 1994)*. See generally *Annotation, Libel and Slander: Privilege Applicable to Judicial Proceedings as Extended to Quasi-Judicial Proceedings, 45 ALR 2d 1296 (1954 and 1995 Supp.)*.

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given an opportunity to respond. The Audit Division has none of the adjudicative powers listed above. Moreover, even FEC's functions at the later proceedings are not quasi-judicial in character. Its function in releasing the final audit report involves only an internal review process and decision to release to the public. Thereafter, FEC may receive the campaign organization's comments and provide the candidate "...with an opportunity to address the Commission in open session," 11 CFR §9038.2 (c)(3), after which FEC makes its repayment determination. There is no evidentiary hearing and no fact finding, and FEC lacks the powers to enforce decisions and impose penalties; if a campaign organization refuses to comply with its decisions, FEC's sole remedy is to bring suit in United States District Court. FEC's audit function under PMPA is not quasi-judicial, and the preliminary stages of its audit staff's continuing audit are certainly not so.

E. The "Quarles" Privilege

In re Quarles, 158 U.S. 532, 15 S.Ct. 959, 39 L.Ed. 1080 (1895) was a case in which some citizens reported to a deputy United States Marshal that a Mr. Worley was operating an illegal still and found themselves indicted for conspiracy to interfere with Mr. Worley's constitutional rights. The Supreme Court held no more than that a citizen was privileged to report a crime to the police. 158 U.S. at 535 ("It is the duty and the right, not only of every peace officer in the United States, but of every citizen, to assist in prosecuting and in securing the punishment of any breach of the peace of the United States."). In Mazanderan v. McGranery, *supra*, 490 A. 2d at 182, the District of Columbia Court of Appeals applied the

Quarles rule to letters sent by the defendant to the Immigration and Naturalization Service and the D.C. Police stating the plaintiff was an illegal alien. These cases stand for no more than that citizens are privileged to report crimes to appropriate law enforcement authorities. By contrast, this case has nothing to do with reporting crimes or other violations to law enforcement authorities. Instead, defendants were merely given an opportunity under FEC regulations to give their views on matters raised in FEC audit staff's progress report of its continuing audit, and, in order to mislead FEC's audit staff, falsely blamed plaintiff's for actions and wrongs which were their own doing. The Quarles privilege has no relevance to this case.

F. The Libels were "Of and Concerning" Plaintiffs

To be actionable, a defamatory statement must be "of and concerning" the plaintiffs. See Rosenblatt v. Baer, 383 U.S. 72, 75, 86 S. Ct. 669 (1966). It is not necessary, however, that the libel plaintiff be named in the offending publication. Rather, even where the plaintiff is not named, it is sufficient that the statements would point to the plaintiff in the minds of a knowledgeable segment of the community. See Cunningham v. United National Bank of Washington ("Cunningham"), 710 F. Supp. 861 (D.D.C. 1989). As will be explained below, POC was specifically named in defendants' publications to FEC's audit staff and in the FEC republication in its final audit. Although the individual plaintiffs are not named, the statements are "of and concerning" them, as well, because "... the owner of a business can be defamed, even though the publication does not refer to him by name, when the asserted libel

refers to some ascertained or ascertainable person." Cranberg v. Consumers Union ("Cranberg"), 756 F.2d 382, 389 (5th Cir. 1985) (Texas law). While officers and shareholders of large, publicly held corporations may not sue for statements defamatory of the corporation, a defamation action will lie when the corporation is a small operation owned and associated with the individual plaintiffs or where the libel of the corporation clearly refers to the people operating the corporation. See Schiavone Const. Co. v. Time, Inc. ("Schiavone"), 619 F. Supp. 684, 696-697 (D.N.J. 1985). See also Cranberg (sole owner of company entitled to bring suit in own name "because those who knew and were acquainted with him understood from reading the publication that it referred to him."); Dion v. Kiev, 566 F. Supp. 1388, 1389 (D. Pa. 1983) (manager of club entitled to bring suit for statement not naming him that club is mismanaged). See generally Annotation, Identification of Defamed Party, 54 ALR 4th 756 (1985 and 1995 Supp.) In Shop Called East v. KYW- Channel 3, 8 Media L. Rptr. 1399 (D.N.J. 1982), the court held that the two owners of a store which a television report had said was selling illegal drug paraphernalia could sue in their own names although only the store had been named in the television report. The court said:

Presumably some members of the viewing public - - perhaps friends or neighbors of the owners - - knew that the story pertained to them. It is certainly plausible that plaintiff could prove third persons who heard the publication knew it pertained to the individual owners of the store.

8 Media L. Rptr. at 1402.

In the present case, defendants submitted to FEC's audit staff a description of their

computer service vendors. It is at attachment 5 to Exhibit 2 (the Final Audit Report on the Defendant Committee). It clearly identifies POC by the functions it performed in the primary campaign, describing those functions in detail. Attachment 5, page 3. The same statement falsely states that the Defendant Committee had to reconstruct data for debt schedules originally prepared by POC. One of the defamatory statements refers to "her,"²⁶ an obvious reference to Plaintiff Patricia Anderson, who primarily interfaced with FEC staff. The attachment clearly states that POC provided data processing services related to contribution records and matching fund submissions and states that POC is being terminated. FEC staff would clearly have known from this submission and the defamatory statements in the Committee Response that POC was being referred to and that the wrongdoing suggested related to its two prominent owners.²⁷ Attachment 5 is part of the Final Audit Report which was made available to the public. As noted earlier, defendants are responsible for this republication.²⁸ Significant members of the political community in which plaintiffs compete, as well as personal acquaintances, would know the statements refer to POC and cast disrepute also on the individual plaintiffs, who promoted themselves based on their successful participation in the 1992 primary. Plaintiffs recognize the need for proof on these points, but the cited cases make clear that this issue cannot be resolved against them on a motion to

²⁶ *Defendants' Exhibit 1, p. 3, republished by FEC Final Audit Report, Exhibit 2, p. 5.*

²⁷ *Plaintiffs, husband and wife, are the sole owners of POC, prominently and actively involved in its business. They are known as such in the local political community, where they compete for business.*

²⁸ *Note 1, supra.*

dismiss.

G. Sufficiency of The Complaint

1. Proper Procedure

In their Motion to Dismiss, at pp. 11-22, defendants argue that the various defamatory statements complained about in paragraph 21 of the complaint cannot support a libel action because they are true and not negligently made and, in two instances, allegedly matters of opinion. In plaintiffs' view, these arguments are not properly before the court on a motion to dismiss, which contains no moving affidavit or other sworn matter, such as a deposition, and, with the exception of the Committee Response, does not even attach the documents from which it quotes selected excerpts. Of course, a Rule 12(b)(6) motion can do more than test the sufficiency of the complaint's allegations by adding matter outside the complaint, but it cannot do so by ignoring the procedural requirements of the rules.

When a Rule 12(b)(6) movant includes matter outside of the face of the complaint and the district court proposes to treat the motion as one for summary judgment, it must first convert the motion to one for summary judgment and notify the opposing party of the need to submit affidavits in opposition. See Goldman v. Belden, 754 F. 2d 1059 (2d Cir. 1985). See also Marshall County Health Care Auth. v. Shalala, 988 F.2d 1221, 1226 (DC Cir. 1993) ("Of course, when a district court is not sitting as an appellate court and the district judge looks outside the complaint, he or she must convert a motion to dismiss into a motion for summary judgment."). Such a motion, however, must meet the requirements of Rule 56. See generally

5A C. Wright and A. Miller, Federal Practice and Procedure §1366 at 501 (1990). In Sardo v. McGrath, 196 F.2d 20, 22-23 (D.C. Cir. 1952), for example, the defendant sought to sustain a dismissal as summary judgment under Rule 12(b)(6) based on facts asserted in its memorandum to the district court. The court of appeals reversed, holding that, to be considered on a Rule 12(b)(6) motion, for factual matters contradicting the pleadings "...the extra-pleading matters presented must be either 'depositions,' 'admissions' or 'affidavits'." Id. The artfully chosen excerpts from documents which defendant have included in their motion to dismiss certainly cannot meet requirements to be considered on a Rule 12(b)(6) "speaking motion" because, "[t]o be considered by the court, documents must be authenticated by and attached to an affidavit that meets the requirements of [Rule] 56(e) and the affiant must be a person through whom the exhibits could be admitted into evidence." Hal Roach Studios v. Richard Feiner and Co., 896 F.2d 1542, 1550-1551 (9th Cir. 1990), quoting Canada v. Blain's Helicopters, Inc., 831 F.2d 920, 925 (9th Cir. 1987). See generally 10A C. Wright, A. Miller and M. Kane, Federal Practice and Proc. §2722 at 60-61 (2d ed 1983); Nolla Morell v. Riefkohl, 651 F. Supp. 134 (D. P.R. 1986)(and cases cited at 140). Accord Carey Canada, Inc. v. California Union Ins. Co., 748 F. Supp. 8, 13 (D.D.C. 1990) (motion to strike exhibit from consideration on Summary Judgment granted where it was "neither attached to an affidavit nor certified"). A document not authenticated by affidavit "...cannot be used to support a motion for Summary Judgment." Hal Roach Studios v. Richard Feiner and Co., supra, 896 F.2d at 1551.

2. The Defamatory Statements

Paragraph 21.a. of the complaint alleges, in substance, that, commenting on the interim audit report's tentative conclusion that the audit had shown that there were improper redesignations of primary contributions to the general election compliance fund, defendants had falsely stated that POC had treated the contributions as redesignations when they were not redesignations,²⁹ that it had done so without the Committee's knowledge and that it had done so, apparently, to "run up a bill" on the Committee.³⁰ The proof will show that the entire redesignation effort was run from defendants' Little Rock, Arkansas headquarters, that defendants were fully aware of it (since it was a massive mailing to over 30,000 contributors which they did), that plaintiffs' sole functions in relation to the redesignations³¹ in issue were

²⁹ *The Committee argued that the contributions were "undesigned contributions."*

³⁰ *Paragraph 21b of the complaint quotes the Committee Response's statement that POC secretly performed unnecessary redesignations because its contract "included an incentive for the vendor to treat contributions as though additional documentation or affidavit was necessary." Defendants say this was true, because the contract did in fact contain an incentive clause. Defendants, however, have not put the contract before the court, and for a very good reason, because the proof will show that there was no contract between the parties. Moreover, the juxtaposition of the quoted statement with the allegation of secretly doing unnecessary and improper work clearly leads readers to believe the Committee is accusing POC and its owners of greed, as is evident from the FEC's rephrasing of the statement when it repeats it in the Final Audit Report on the Committee:*

The [Committee's] explanation suggests that due to provisions in that vendor's contract, the vendor stood to gain by sending the redesignation requests.

Exhibit 2 at p. 83. Plaintiffs' proof will further show that they were not motivated by greed, as they voluntarily rebated \$104,178.12 to the Committee though not obliged to do so by contract.

³¹ *At the end of a primary campaign, funds can be "redesignated" to a general campaign organizations, as the Committee had done in this case, under proper circumstances. The FEC auditors suggested in the interim audit report that the proper circumstances were not*

to submit information to Little Rock on request and later to correct the records of the primary campaign as directed by the Committee. Moreover, the proof will show that defendants made these false allegations because they were switching tactics by trying to call "undesigned" contributions which they themselves had originally treated as designated to the primary campaign, i.e., defendants lied to FEC's auditors to blame on a third party what they themselves had done so as to enhance their efforts to get FEC's auditors to recognize the contributions as something different from what defendants had called them.

Plaintiffs recognize that they will bear the burden of proving the defamatory statements false, see Cunningham, supra, and they plan to do so, but the evidence is not before the court at this time. Moreover, defendants' contention that these are opinions of an expert on election law does not address the factual assertions against plaintiffs, i.e., that plaintiffs, not defendants, performed the redesignations, that plaintiffs did it without the knowledge of the Committee and did so for gain. These are assertions of historical fact which can be proved true or false and are not opinion. See Ollman v. Evans, 750 F. 2d 970 (D.C.Cir. 1984) (en banc).

In Paragraph 21c of the complaint, the Committee states that its beginning and ending balances' discrepancies were due to POC's errors. The proof will show that the errors in question were the Committee's, and it gratuitously blamed its own errors on POC. This is a factual issue capable of clear proof as to the source of each error.

In paragraph 21d, the complaint alleges that the Committee Response told the auditors

met.

it experienced "significant difficulties" with POC. This is not a statement of opinion; its innuendo is very clearly that POC was not properly performing the functions delegated to it. Plaintiff will prove this factual assertion is not true.

3. Public Figure Status

Defendants argue that plaintiffs are public figures because they were contractors for a political campaign. It is hard to see the relevance of this argument at this time, because the complaint has alleged the actual malice required when a libel plaintiff is a public figure. See Gertz v. Robert Welch, Inc. ("Gertz"), 418 U.S. 323, 94 S. Ct. 2997, 41 L. Ed. 2d 789 (1974). Paragraph 23 of the complaint alleges.

Defendants made all of the statements with actual malice, in that they knew the statements were false or made the statements with reckless disregard for their falsity.

There is no requirement that plaintiffs plead their proof on this issue, and Thomas v. News World Communications, 681 F. Supp. 55 (D.D.C. 1988) certainly does not impose one.³² The proof will show that the redesignation effort run out of defendants' Little Rock headquarters

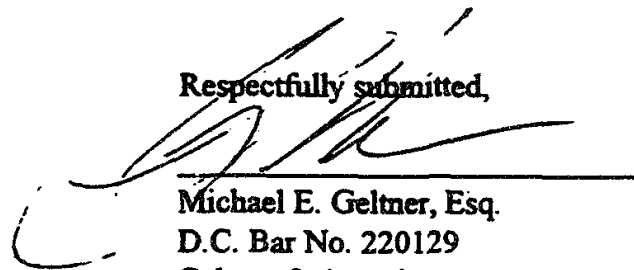
³² Plaintiffs do not believe Buchanan v. Associated Press, 398 F. Supp. 1196 (D.D.C. 1975) applies to this case. Plaintiffs feel this issue is premature, because no current consequence attaches to the public figure designation. Buchanan was a Nixon presidential campaign accountant who cashed checks and gave the Nixon campaign cash in the midst of the active and ongoing Watergate controversy over campaign finance, and the court held that, by taking employment and converting checks to cash, he "thrust himself into the controversy." To apply it here would establish per se that all campaign vendors and employees are public figures, which would negate Gertz' carefully drawn distinction between public figures and private parties involved in public issues.

was a massive letter writing campaign, and defendants could hardly have done it themselves and not known so, which would be necessary to avoid the conclusion of knowing falsity.

III. Conclusion

The Motion to Dismiss should be denied in whole.

Respectfully submitted,



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Public Office Corporation,
William Anderson and
Patricia Anderson

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

10/10/95

_____)
PUBLIC OFFICE CORPORATION, et al.)
)
Plaintiffs,)
)
v.)
)
CLINTON FOR PRESIDENT)
COMMITTEE, et al.)
)
Defendants.)
_____)

Civil Action No. 95-1264 (TFH)

REPLY MEMORANDUM IN SUPPORT
OF DEFENDANTS' MOTION TO DISMISS

Dismissal is mandatory because (1) Congress by statute has barred this action in 2 U.S.C. § 437d(c); (2) the United States Supreme Court has held that "such information, given by a private citizen, is a privileged and confidential communication for which no action of libel or slander will lie," In re Quarles, 158 U.S. 532, 535-536 (1895); and (3) the District of Columbia Court of Appeals has recognized three absolute privileges, applicable to both attorneys and parties, which mandate dismissal.

There is no need for the oral argument requested by plaintiffs and therefore this Court should exercise its discretion under Local Rule 108(f) to dismiss immediately this action.

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I. CONGRESS HAS EXPRESSLY BARRED THIS ACTION

The parties agree that 2 U.S.C. § 437d(c) provides in full as follows:

No person shall be subject to civil liability to any person (other than the Commission or the United States) for disclosing information at the request of the [Federal Election] Commission.

The Complaint in this action alleges libel of the plaintiffs in the Response of the Clinton for President Committee ("Committee") to the Interim Audit Report of the Federal Election Commission ("FEC"). The Complaint admits that this Response was filed July 6, 1994 with the FEC.

Both defendant Committee and defendant attorney are a "person" as defined in 2 U.S.C. § 431(11) ("[T]he term 'person' includes an individual, partnership, committee, association, corporation. . ."). Under the statute, this is the end of the matter. In construing a statute, this Court must give effect to the will of Congress and where, as here, that will has been expressed in reasonably plain terms, that language must ordinarily be regarded as conclusive. Negonsott v. Samuels, 113 S. Ct. 1119, 1122-23 (1993). Because this Court must give effect to the clear meaning of this statute as written, Estate of Cowart v. Nicklos Drilling Co., 112 S. Ct. 2589, 2594 (1992), immediate dismissal is required.

The FEC conducted a statutory audit of the Committee pursuant to 26 U.S.C. § 9038. All information obtained by the FEC during the audit was "at the request of the Commission" within the plain meaning of 2 U.S.C. § 437d(c). Such protected information included the information in the Committee's Response, which was republished by the FEC in its Final Audit Report of December 27, 1994.

Plaintiffs' attempt to evade the clear statutory language "finds no support in either the language or an authoritative interpretation of the statute." Colautti v. Franklin, 439 U.S. 379, 401 (1979).

- a) The July 6, 1994 Committee Response filed with the Federal Election Commission was "at the request of" the FEC.

Attached as Exhibit 1 to this reply is a true copy of the FEC transmittal letter and Interim Audit Report, both of which bear the logo and name of the Federal Election Commission. These are properly considered by this Court on a motion to dismiss because the Interim Audit Report is incorporated in Paragraph 16 of the Complaint 1/, and in any event, these are public records of a federal agency that may be considered on this motion without triggering a conversion to a motion for summary judgment. 2/

FEC regulations, 11 C.F.R. § 9038.1(c)(2), required that the FEC give the Committee "an opportunity to submit, in writing, within 30 calendar days after service of the interim report, legal and factual materials disputing or commenting on the contents of the interim report" and further required that "the Commission will consider" the Response, id. at (c)(3). This Response to the FEC is, as a matter

1/ YWCA of Nat. Cap. Area, Inc. v. All State Ins.Co., 158 F.R.D. 6, 7 (D.D.C. 1994); Wright & Miller, Federal Practice and Procedure: Civil 2d § 1363 at 464-466.

2/ Barron v. Reich, 13 F.3d 1370, 1377 (9th Cir. 1994) (Dept. of Labor handbook); Kramer v. Time Warner, Inc., 937 F.2d 767, 774 (2d Cir. 1991) (filings with SEC).

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of law, at the request of the FEC. The FEC transmittal letter even uses the statutory verb: "you are requested to comply with the recommendations by May 4."

Moreover, the FEC Recommendations in the Interim Audit Report are themselves requests for information. Recommendation 8 at p. 30 of the Interim Audit Report, for example, specifically requests the following information about the corporate plaintiff: "within 30 calendar days of service of this report that the Committee . . . explain and document the functions of Public Office Corporation ("POC"), with respect to services provided to the Committee."

Similarly, with respect to "redesignat[ions]", which plaintiffs claim to be "the most damaging of the defamatory statements" 3/, Recommendation 10 at page 45 of the Interim Audit Report is a specific FEC request:

within 30 calendar days of service of this report, the Committee provide evidence to demonstrate that it did not receive matching funds in excess of entitlement. Absent such a demonstration, the Audit staff will recommend that the Commission make an initial determination that the Committee repay \$3,674,353 to the U.S. Treasury.

Plaintiffs contend that the Response is "neither required nor sought" by the FEC. Plf. Opp. at 6. This misstates the statutory test. The statute applies to a "request"; the term "required" does not appear in the statute. The FEC's April 1, 1994 letter specifically uses the statutory term "requested to comply" -- and then imposes a date certain for that Response. Recommendations 8 and 10 use

3/ Plf. Opp. at 2-3.

synonyms for "request": "explain and document" in Recommendation 8 (p. 30) and "provide evidence to demonstrate" in Recommendation 10 (p. 45).

Plaintiffs would eviscerate the very purpose of 2 U.S.C. § 437d(c) in the absence of a mechanistic recitation of the words at the "request of the Commission" preceding each sentence of information sought by the Commission. Congress did not so require in 2 U.S.C. § 437 d(c).

b) The Interim Audit Report is "of the Commission"

The statutory term "Commission," as used in 2 U.S.C. § 437d(c), is defined not at 2 U.S.C. § 437c, as contended at Plf. Opp. at 7-8, but at 2 U.S.C. § 431 ("Definitions"):

- (10) The term "Commission" means the Federal Election Commission

Plaintiffs contend that "Commission" means only "members of the Commission." However, the statute's "definition which declares what a term 'means' . . . excludes any meaning that is not stated." Colautti v. Franklin, 439 U.S. at 392-93 n. 10 quoting 2A C. Sands, Statutes and Statutory Construction § 47.07 (4th ed. Supp. 1978). Indeed, when Congress wished to refer to "members of the Commission," Congress did so expressly. See, e.g. 2 U.S.C. § 437c(a)(2)(A) & (B).

The definition of "Commission" in 2 U.S.C. § 431 is also repeated with one additional phrase in the "Definitions" section of the PPMPAA, 26 U.S.C. § 9032, which states that "for the purposes of this chapter — . . . (3) the term 'Commission' means the Federal Election Commission established by section 309(a)(1) of the

Federal Election Campaign Act of 1971." "Commission" is not defined to mean "members" here either.

Under 2 U.S.C. § 438, it is "the Commission" that "may conduct audits and field investigations" and as to which "all audits and field investigations concerning the verification for, and receipt and use of, any payments received by a candidate or committee under Chapter 95 or 96 of the Internal Revenue Code of 1954 shall be given priority." Under 26 U.S.C. § 9038(a), "[a]fter each matching payment period, the Commission shall conduct a thorough examination and audit. . . ." (emphasis added) And it is "the Commission" which "is authorized . . . to institute actions . . . to seek recovery of any amounts determined to be payable to the Secretary as a result of an examination and audit made pursuant to Section 9038." 26 U.S.C. § 9040(b).

Pursuant to 11 C.F.R. § 9038.1(c)(1), it is "the Commission" that "will issue an interim audit report to the candidate and his or her authorized committee" and it is "the Commission" that pursuant to 11 C.F.R. § 9038.1(c)(3) "will consider any written legal and factual materials submitted by the candidate or his or her authorized committee in accordance with 11 C.F.R. 9038.1(c)(2)."

The April 1, 1994 letter transmitting the Interim Audit Report bears the logo and name of the "Federal Election Commission." Paragraph 2 of the letter states "the Commission will not grant extensions of time to respond to Audit Reports as a matter of routine." (emphasis supplied). Paragraph 3 of the letter states, in pertinent part, "notice of Commission repayment determinations have

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been satisfied by your receipt of the Commission's interim audit report" (emphasis supplied). The first page of the Interim Audit Report also bears the logo and name of the "Federal Election Commission."

- (c) By its terms, 2 U.S.C. § 437d(c) covers all information at the request of the Commission

Plaintiffs ask this Court to add limiting words to a statute that do not appear there. Plaintiffs would limit § 437d(c) to subpoenaed testimony and reports under § 437 but not audits and federal investigations under § 438(b) and elsewhere. In determining the scope of a statute, this Court must look first to the language of the statute. Reves v. Ernst & Young, 113 S. Ct. 1163, 1169 (1993). Plaintiffs' purported limitation "finds no support in either the language or an authoritative interpretation of the statute." Colautti v. Franklin, 439 U.S. at 401.

Nor does the statute exempt the audit information obtained by FEC under PPMPA. 2 U.S.C. § 437d(c), by its terms, covers "information" --- all "information," large or small, no matter the form or manner by which the FEC requests it.

Congress' broad sweep in 2 U.S.C. § 437d(c) is matched by Congress' identical language in 15 U.S.C. § 2076(d) (Consumer Product Safety Commission). Congress has made the legislative judgment that it is in the public interest that information supplied at the request of FEC or CPSC is so important that it cannot be the basis of civil liability to third parties. It is not the province of this Court to limit or "second-guess" this legislative determination. Cf. American Council of Life Ins. v. District of Columbia, 645 F. Supp. 84, 88 (D.D.C. 1986).

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II. THE SUPREME COURT HAS EXPRESSLY BARRED THIS ACTION

In re Quarles, 158 U.S. 532 (1895), recognized an absolute privilege of every citizen to communicate information to the executive branch about "a violation of the internal revenue laws of the United States." Id. at 537. "Such information, given by a private citizen, is a privileged and confidential communication for which no action of libel or slander will lie." Id. 535-536. Because the Presidential Primary Matching Payment Account Act ("PPMPAA") is part of the Internal Revenue Code, 26 U.S.C. § 9001 et seq., Quarles is binding and dispositive.

Plaintiffs attempt to limit the Quarles holding to "crimes" and not civil violations of the internal revenue laws. However, the holding of the case is not so limited and plaintiffs cite no case from the Supreme Court or any other court so holding. To the contrary, in the District of Columbia, Mazanderan v. McGranery, 490 A.2d 180, 182 (D.C. 1984) correctly and broadly construed Quarles as creating an independent absolute privilege for information furnished to any federal agency concerning matters within its jurisdiction. In any event, violations of the PPMPAA are both criminal, 26 U.S.C. § 9042, and civil, 26 U.S.C. § 9040(b), so that even if plaintiffs were correct (and they are not), Quarles is applicable to a Response to the FEC under the PPMPAA.

Thus, although there is no need for this Court to go beyond the clear language of 2 U.S.C. § 437d(c) to dismiss this action, if it were to do so, In re Quarles similarly compels dismissal.

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III. THE D.C. COURT OF APPEALS RECOGNIZES THREE ABSOLUTE PRIVILEGES THAT COMPEL DISMISSAL OF THIS LAWSUIT

Contrary to plaintiffs' contention in its caption C at page 10 of its opposition, these three absolute privileges are not limited to the "attorney's" privilege, but extend likewise to the attorney's client.

1. As discussed above, Mazanderan v. McGranery, 490 A.2d at 182 recognizes an independent absolute privilege for information furnished to a federal agency concerning matters within its jurisdiction. Plaintiffs do not and could not claim that the Committee's Response to the FEC Interim Audit, filed with the Federal Election Commission, did not concern matters within the FEC jurisdiction. Thus, Mazanderan makes absolutely privileged the entire Response, requiring dismissal of the complaint.

2. McBride v. Pizza Hut, Inc. 658 A.2d 205, 207-208 (D.C. 1995), holds that a lawyer's response to a demand letter by a potential litigant is "geared toward avoiding . . . proposed litigation" and is absolutely privileged. This is precisely applicable here where the FEC Interim Audit Report demanded -- incorrectly -- that the Committee had to repay \$4,143,375.00 in federal matching funds. Id. at 46. The Committee Response, pursuant to 11 C.F.R. 9038.1(c)(2), was geared toward avoiding this proposed litigation which the Commission must bring under 26 U.S.C. § 9040(b) to recover monies identified in the audit.

McBride is the authoritative statement in the District of Columbia of how Restatement (Second) of Torts § 586 (applicable to attorneys) and § 587

(applicable to parties) confer absolute privilege for attorneys and parties in "communications preliminary to a proposed judicial proceeding." Plaintiffs' citation of cases from Arkansas, California and Oregon are wide of the mark. McBride is controlling and dispositive.

The Committee's Response to the FEC was a "communication preliminary to a proposed judicial proceeding" within the meaning of McBride which construed authoritatively §§ 586 and 587 of the Restatement. Rather than confront this controlling law head-on, plaintiffs attempt to divert this Court by an extended discourse about quasi-judicial privilege, Plf. Opp. 13-16, which plaintiffs characterize mistakenly as "[t]he heart of this motion is really about whether the audit proceedings were a quasi-judicial administrative proceeding." Id. at 13. This is not the argument made by the Committee and plaintiffs are refuting a straw man.

3. District of Columbia law also recognizes a third absolute privilege with respect to the submissions in the District of Columbia by an attorney in the District of Columbia to an agency located in the District of Columbia, as required by statute where the information supplied is to be kept confidential except as otherwise provided by law. Goggins v. Hoddes, 265 A.2d 302 (D.C. 1970); see also Elliott v. Healthcare Corp., 629 A.2d 6, 9 (D.C. 1993). It is not an element of this absolute privilege that the response be preliminary to a proposed judicial proceeding or that there be any proceeding whatever. Once again, plaintiffs' reliance on cases from Virginia, Washington, Georgia, and Illinois do not change the

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controlling and dispositive law in the District of Columbia as established by the D.C. Court of Appeals.

IV. **PLAINTIFFS HAVE FAILED TO PLEAD THAT THE ALLEGED LIBEL OF AN UNNAMED CORPORATE VENDOR "LEAVES NO DOUBT" AS TO THE IDENTITY OF THE CORPORATE VENDOR**

It is undisputed that none of the allegedly libelous statements mention POC by name. It is undisputed that POC's principals, individual plaintiffs William and Patricia Anderson, are not mentioned at all.

Plaintiffs cite - as they must - Cunningham v. United National Bank of Washington, 710 F. Supp. 861, 863 (D.D.C. 1989) for "the requirement that the libelous statement 'must leave no doubt' as to the person's identity," quoting Summerlin v. Washington Star, 7 Media L. Rep. 2460, 2461 (D.D.C. 1981) (emphasis in original). In Summerlin, Judge Johnson of this Court also noted that under District of Columbia law "in a suit for defamation, there must be proof of certainty as to the person defamed . . ." Summerlin at 2461 (emphasis added).

In light of the six computer vendors identified by the Committee in the Appendix, plaintiffs not only cannot allege but they could not possibly prove that an alleged libel of an unnamed computer vendor "must leave no doubt" that the vendor was POC.

In any event, individual plaintiffs have no answer to Golden Palace Inc. v. National Broadcasting Co., 386 F. Supp. 107 (D.D.C. 1974), aff'd, 530 F. 2d 1094 (D.C. Cir. 1976), recognizing under District of Columbia law the distinction

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between defamation of a corporation and defamation of corporate officers.

Plaintiffs' cases from Texas, New Jersey, and Pennsylvania are not the law in the District of Columbia where the officer of a corporation who is not personally defamed has no right to recover damages for alleged defamation about the corporation.

Plaintiffs go on to argue that defendants are responsible for the FEC's "Final Audit Report which was made available to the public." Plf. Opp. at 19. Of course, defendants have no control over the information obtained by the FEC under its statutory audit. Defendants also had no control over which portions of the Committee Response were republished by the FEC in its Final Audit Report. These facts reaffirm the wisdom of Congress' choice in 2 U.S.C. § 437d(c) that

No person shall be subject to civil liability to any person (other than the Commission or the United States) for disclosing information at the request of the Commission.

V. THE CONCLUSORY ALLEGATIONS OF ACTUAL MALICE REQUIRE DISMISSAL

Here as in Thomas v. News World Communications, 681 F. Supp. 55, 65 (D.D.C. 1988), the Complaint contains a conclusory allegation of malice, but nothing more. Paragraph 23 of the Complaint alleges solely that "defendants made all of the statements with actual malice, and that they knew the statements were false or made the statements with reckless disregard for their falsity." In Thomas, Judge Oberdorfer granted a motion to dismiss where "the complaint asserts but does not support an allegation of actual malice." Id. at 65. There, as here,

"plaintiffs employ the word 'malice' as an empty epithet, devoid of factual content . . . The complaint lacks any colorable claim that . . . the challenged statements [were made] with actual malice." Id. Thomas is not a requirement that "plaintiffs plead their proof on this issue" as plaintiffs attempt to characterize it, Plf. Opp. at 24, but a requirement that plaintiffs allege facts that would support a finding of actual malice. This they have failed to do.

Buchanan v. Associated Press, 398 F. Supp. 1196 (D.D.C. 1975), squarely holds that an accountant for an accounting firm for a presidential reelection committee is a public figure for purposes of libel law. Waldbaum v. Fairchild Publications, Inc., 627 F.2d 1287, 1296-98 (D.C. Cir.), cert. denied, 449 U.S. 898 (1980), sets forth the three part test for determination of a limited purpose public figure and all plaintiffs clearly qualify. Plaintiffs disagree with Buchanan, but it is the law in this court. The significance of Buchanan is that it requires more than a conclusory allegation of actual malice. Dismissal is accordingly required.

VI. NONE OF THE STATEMENTS CAN SERVE AS THE BASIS FOR A LIBEL ACTION

As set forth in great detail at pages 11-22 of the initial memorandum in support of the motion to dismiss, the four allegedly libelous statements are true; nonactionable opinions; fair use of words first used by the FEC in the FEC Interim Audit Report; admitted in writing by apologies from plaintiffs; and not negligently made. Because plaintiffs have made totally false charges against a presidential campaign and its counsel, it was necessary for defendants to set the record straight. However, it is not necessary for this Court to reach these arguments in order to

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grant the motion to dismiss. Indeed, where the Congress, the United States Supreme Court and the D.C. Court of Appeals have clearly directed this Court that there is no action for libel in a Committee Response to an FEC Interim Audit Report, immediate dismissal can be entered without even reaching the clear truth of the nonactionable statements that are alleged to be libelous.

However, in order to correct the public record of yet another false statement by plaintiffs, the Committee hereby attaches the executed contract signed for plaintiff POC by plaintiff William R. Anderson. This refutes footnote 30 of plaintiffs' Opposition which falsely states "there was no contract between the parties." We now put the contract before the Court, not for consideration on the motion to dismiss (as to which it is not needed), but solely to correct the record once again with respect to false and scurrilous charges being made by these plaintiffs in an attempt to cause public political embarrassment. The last sentence of Rule 12(b), Fed. R. Civ. P., is clear that if, on a motion to dismiss, this Court does not actually consider extraneous materials, there is no need to convert the motion to one for summary judgment. 4/

4/ Plaintiffs' Opposition does not even purport to respond to the argument at page 4 of defendants' motion that diversity of citizenship jurisdiction appears to rest solely on the false statement that the Committee's attorney, a partner in a Washington, D.C. law firm (with resident partners in Washington, D.C. and Virginia, thereby destroying diversity), was "acting on her own behalf" (Complaint ¶ 19) as well as counsel to the Committee in filing the Committee's response with the FEC. Where, as here, the motion to dismiss denies or controverts the pleader's allegations of jurisdiction, the allegations of the Complaint are not controlling. District of Columbia Retirement Bd. v. United States, 657 F. Supp. 428, 431 (D.D.C. 1987); accord Walker v. Jones, 733 F.2d 923, 935 (D.C. Cir.) (MacKinnon, J., dissenting in part and concurring in part), cert. denied, 469 U.S. 1036 (1984). As Wright & Miller explain, "[s]ince the party invoking the federal court's jurisdiction

CONCLUSION

This case is utterly frivolous. It should be dismissed at once, without hearing.

Respectfully submitted,

HOGAN & HARTSON L.L.P.

By: John C. Keeney, Jr.
John C. Keeney, Jr.
D.C. Bar No. 934307
555 Thirteenth Street, N.W.
Washington, D.C. 20004
(202) 637-5600

Counsel for Defendants

has the burden of proving the actual existence of subject matter jurisdiction regardless of the pleadings' allegation, the courts have held that the pleader must establish jurisdiction with evidence from other sources, such as affidavits or depositions." Wright & Miller, Federal Practice and Procedure: Civil 2d § 1363 at p. 456-57. Plaintiffs have submitted no such material. Accordingly, this Complaint must be dismissed in its entirety for lack of diversity of citizenship jurisdiction, unless plaintiffs were to file an amended complaint, solely against defendant Committee (as to which there would be diversity jurisdiction if defendant Committee were the sole defendant).

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Anderson Report - Tab 16

16004 and 16007-16042: Documents pertaining to White House contacts with Andersons

Between September 1994 and February 1995, the Andersons were in contact with two well-known White House staffers, Marsha Scott and Mark Middleton. This period of time was between the time Lyn Utrecht submitted false statements to the FEC and it handed the CPC the very favorable decision. Refer to Tab 2, Documentary With Reference, Sections 13.0 and 14.0 for more details. The following account is written from Pat Anderson's perspective:

Early September 1994 I received a request from Mark Middleton to meet at the Hay-Adams Hotel (near White House) for the purpose of discussing how POC's services and capabilities could help Clinton's 1996 reelection effort; Marsha Scott was to meet with us.

September 13, 1994 I met with Mark Middleton and Marsha Scott; Mark came first and chatted with me re databases that needed to be pulled together; when Marsha arrived, Mark immediately departed, leaving Marsha and I to talk for 30-45 minutes more. Meeting notes are Doc 16004/A.

At this meeting, Marsha told me that a computer vendor in Arkansas, an old friend of Clinton's, had made a mess of pulling together the main contributor file that was to be used by the upcoming reelection's fundraising and campaign support. She said Mark had praised POC's efforts, quality, and reliability during 1992. She stated she knew us to be a little expensive but that we were worth it! She said she had finally talked the President into turning away from his "friend in Arkansas" and to rely on us, or someone like us, to do the 1996 job. She stated that "time was running out" and "we're getting a late start".

Marsha was very anxious to "get started" with the process of me studying what they were doing at the White House (WH) and she gave me her secretary's name and that of Erich Vaden, the person who could tell me all about the WH database and record layout's and requirements, etc. Marsha had stated at least one other vendor would also be asked to submit proposals, one of which was the vendor which had designed and implemented the WH's current WHO system. Note reference to that vendor in Doc 16040 memo.

September 15, 1994 I met with Erich Vaden (at Marsha's request) in his office at the Old Executive Office Building; Erich was in charge of the "WHO" DB system at WH, the system Marsha stated she wanted to emulate for the 1996 campaign.

16000

- September 16, 1994 I wrote a memo to Marsha Scott summarizing events thus far, Tab 16, Doc 16037-16040; I was embarrassed to learn later that the spelling of Scott's first name was not "Marcia" but "Marsha".
- September 28, 1994 I had requested earlier something in writing to tie down specifications for POC's use in a proposal that Marsha had indicated she needed ASAP; on 9/28 a one-page FAX from Erich Vaden (Doc 16007/C) rather casually, I thought, set out very "non-specific" requirements that POC had to use to submit this "very important" proposal that was so "urgently needed." Erich's memo is "dated" September 21st but I wrote "28" over 21 because it wasn't until the 28th that the FAX was received in the POC office.
- October 3, 1994 POC submitted its first proposal to White House, as requested by Marsha Scott; a copy was sent to Mark Middleton; copy of proposal cover letter is Doc 16008&9/D.
- November 16, 1994 We sent a memo to Scott and Middleton regarding recent November elections in which the Democrats did not do well. (Doc 16010/E)
- November 28, 1994 Marsha wanted assurances that the 1996 Clinton Clinton campaign would not be paying higher prices than Al Gore was paying us for his services; memo copy is Doc 16011&12/F.
- November 28, 1994 "Personal Note" to Marsha sent along with above. Doc 16013/G)
- December 19, 1994 Memo (Doc 16014/H) we sent to Marsha about the newspaper article (Tab 29, Doc R) regarding \$4.1 million repayment requested by FEC auditors; Bill and I obviously didn't want her to conclude that there had been any problem with our firm's area of responsibility.
- December 15, 1995 Open Meeting at the FEC at which the discussion centered on the huge repayment of \$3.6 million in overpaid matching funds. Without our knowledge, those at the open meeting discussed the fact that the redesignation statements had been obtained by mistake (open meeting transcript in Tab 27) by a greedy vendor (our firm, POC) and that the FEC had already been advised that our firm's relationship would be terminated. (Tab 28, Doc 28104). Neither did we know that the FEC's general counsel had already referred to our firm as a "former vendor". (Tab 21, Doc 21016)

January 25, 1995

At the request of Lyn Utrecht, Bill and I met with her, Barbara Yates, and Allen Wegehof at the our POC offices at 911 Second Street, N.E. Before Lyn started the meeting, Bill complimented Lyn's success in bringing down the CPC's repayment from \$4.3 million to some \$1.3 million. Then Lyn told Bill and me our relationship would be terminated; the CPC wanted all documents relating to the campaign and, if not already in the storage bin, put them there; the key was to be turned over to Utrecht's office. She stated all electronic media should be destroyed. We were in shock; the meeting ended shortly after Utrecht's statement. Yates and Wegehof had sat and watched silently.

February 6, 1995

Bill wrote Utrecht a memo confirming her verbal instructions. He also requested a copy of the final audit report from the FEC.

How and why would the Clinton legal and accounting advisors fire POC and request them to destroy the database and all computer records while ranking WH staffers were soliciting proposals for Clinton/Gore 1996 reelection efforts? The Andersons thought surely some mistake had been made or miscommunication existed. I was so proud of POC's record that I began to write an extensive proposal suggesting the 1996 reelection committee get started right away -- forget the lawyers!

Exact Date Unknown

Bill and I learned, by reading the FEC's final audit report, that Utrecht had made untrue, defamatory remarks to the FEC about POC's job performance; these statements were gratuitous and harsh beyond any supposed "offense" detected by the FEC auditors.

February 16, 1995

Utrecht ignores Bill's letter and writes one of her own, with instructions regarding destroying the Clinton campaign data on POC's computer. She also stated that the Andersons would be asked to sign a statement that they had complied with her instructions and would never talk to anyone about their management of the Clinton 1992 campaign.

It was all too shocking to be believed. We had done such a good job, we still refused to believe that this abuse wasn't a terrible mistake or mixup.

February 23, 1995

Very upset and disheartened, we nevertheless submitted our "un"solicited proposal to our "friends" at the White House.

16002

After the proposal had been submitted, we settled down to try to understand the full picture. That's when we discovered the completely false statements Utrecht had made to the FEC when she blamed POC for obtaining the redesignation statements. Unbelievable. We knew immediately we had a major problem on our hands.

By that time, we also understood the reason for Lyn Utrecht's unusual requests.

Needless to say, we didn't talk to either Lyn Utrecht or Marsha Scott or Mark Middleton again. But some of the bragging (true) statements we had made in our February 23 proposal to the WH ended up being quoted by Utrecht's attorney in legal filings just a few months later.

The cover letter and February 23 proposal narrative (without enclosures) are included in Anderson Report, Doc 16015-16036).

Footnotes to Tab 16 documents and related matters:

>>> As I recall, Marsha never stated POC was being considered for a part in the reelection campaign, only that the database POC was to pull together was going to serve as a basis for the reelection campaign. Whenever we submitted something to her, she indicated great, "we're having a meeting on that" soon. But we received little feedback beyond additional requests for information -- usually many days later.

>>> I met with Erich Vaden a second time at the Executive Office Building and received a demonstration of the WHO WH system, but do not recall the date; I also had various telephone conversations with Erich during this time but do not records have those dates either.

>>> I had several telephone conversations with Marsha; she always indicated she really wanted to work with us, that we were friends, that she was someone I could trust and talk to about anything that might come up that proved troublesome. I recall calling her office one day when her regular secretary didn't answer the telephone. I identified myself and asked to speak to Marsha; the temporary secretary stated Marsha was not in the office but that Marsha had left my name with her with the instructions that if and when I, Pat Anderson, ever called, Marsha was to be made aware of it immediately. The woman said, "You must be a really good friend!" I wonder why Marsha was so concerned about knowing if and when I called yet showed no particular hurry to make decisions regarding all the proposals she asked us to send to the WH?

Conclusion: We do not know if Marsha and Mark were in on the FEC scheme. If they were not, the 1996 reelection campaign was the first business we lost because of Lyn Utrecht's false, defamatory statements.

16003

September 21, 1994

Ernie

Pat Anderson
POC, Inc.
Fax: 202/675-4911

Pat:

Here's the fax you requested summarizing our needs. As I have mentioned over the phone there is a total of about 400,000 records which are currently kept in various formats. From a list/data management perspective we need to do four things:

- Merge 3-4 databases together →
- Input a number of paper records that are in boxes and on cards - *5000 - 10,000*
- Clean up addresses ^{UCLA} and eliminate duplicative information - *delete*
- Begin to include outside sources of information that might be relevant or useful *copy* *the - merge into database*

Looking towards the future, we need:

- The ability for the database to grow significantly over a million records possibly if need be
 - The ability for reports to be generated on the information
 - The ability to provide the information to a number of work stations (at this point I do not know how many)
-
- Down the road, the ability to bring the data in house if we chose to develop our own database

I hope that helps. Give me a call. My numbers again are:

Work: 202/456-5496

Sincerely,

Erich Vaden

FAX

16007

White House
16-C

Public Office Corporation

911 Second Street, N.E.
Washington, D.C. 20002
202 675-4900 / Fax 675-4911

October 3, 1994

Memorandum

For: Marsha Scott

Re: "Superfile" Project Proposal

Thank you for the opportunity to submit this proposal for the workup, standardization, enhancement and integration of various files into a multipurpose "Superfile".

We also include our thoughts as to the steps we should take to be prepared either to provide actual hardware and software support or to just fulfill the role of systems backup and continuing records integrator. The cost to provide the state of readiness outlined in our interpretation of the scope and objectives of this project are included in our cost estimate.

Accepting this proposal and getting the work started in no way precludes you from selecting another approach or another vendor before or at the end of six months. The work we will accomplish and the resulting superfile can be shifted and run on any number of other systems. Further, while you are deciding about other systems and other directions, you always have a fall-back position due to the state of preparedness we are providing.

One very important matter needs to be clarified. POC's record of making sure the customer always gets what they want (while helping them explore options) should demonstrate that our data management philosophy is the antithesis of a "gatekeeper", if gatekeeper is to be interpreted as a group that maintains a barrier between users/customers and their data.

As an example of a demanding application and freedom, we point to Vice President Gore's '88 presidential primary campaign. That campaign had about 16 remote work stations and printers at their headquarters. We supported most work centers of that race with a full complement of products and services (contribution management, thank you letters, lists, reports, scheduling, press releases, invitations, envelopes, labels, etc.) most of which were generated by their staff on their own printers.

Gore's staff also did almost all of their own data entry. We lent a hand when their volume was overwhelming. We provided one expert customer service person to assure a quick response to their requests.

16008

16-D

Incidentally, Gore's group had to load their PC-bound expenditure data to our system for "data manipulation" capability and generation of FEC report schedules that just couldn't be done otherwise. All the while, I don't believe they paid a penny in programming services.

Another example. POC managed in-house Senator Simon's presidential campaign contributions from lockbox/deposit, data entry, reports, FEC reports, matching funds, thank you letters, etc. Senator Simon even had computer generated deposit slips. We also generated reports for the direct mail consultants on the day's receipts while the actual checks were being taken by taxi to the bank.

So you can see that while President Clinton's '92 primary campaign used a vital part of the type services that we have in the past provided to presidential candidates, we do have experience in a wider variety of services.

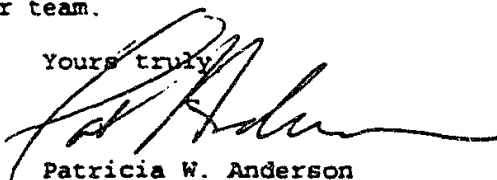
POC strongly believes that true freedom of access is having something worthwhile to access. We know that freedom to access trashy information is not very liberating. Having one at the expense of the other is no good either. Both access freedom AND data quality must be protected.

To give you an idea about the cost of services and products that POC has been providing to their Democratic campaign customers for over 16 years, we include a standard price list which has been and would continue to be discounted for the Clinton Campaign. We also include a few samples of production. The contribution data is from President Clinton's '92 primary campaign.

Finally, we propose to keep you in firm control by providing a meaningful twice-a-month report of progress and problems. We will be glad to furnish further information and will be delighted to have your questions.

We sincerely hope that this proposal gives you some good ideas and that you will select us to be part of your team.

Yours truly



Patricia W. Anderson
President

Enclosure: Proposal
cc: Mark Middleton

16009

MEMORANDUM

TO: Marsha Scott and Mark Middleton
FROM: Pat Anderson, Public Office Corporation
DATE: November 16, 1994
RE: Superfile

It goes without saying that last Tuesday's results and the likelihood that the President will have one or more primary opponents underscore anew your plans to build a superbly accurate and functional superfile.

We would like to underscore our own qualifications and keen desire to be assigned this project as generally outlined in our previous proposal.

We are prepared to give this project the highest priority and to guarantee results you will be pleased with.

We further believe that it should be started immediately in order to assure readiness without corner cutting.

We know that things are extremely hectic and it's hard to find the time to focus on issues that are not pressing at the moment.

LET US HELP BY TAKING SOME OF THE PRESSURE OFF. We know what needs to be done. We know what is going to happen vis a vis the demands on this data.

If funding is the problem, let's talk; perhaps a plan can be worked out between us that will get this project underway.

As always, we are ready to meet with you on short notice.

16010

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Public Office Corporation

911 Second Street, N.E.
Washington, D.C. 20002
202 675-4900 / Fax 675-4911

MEMORANDUM

DATE: November 28, 1994

TO: Marsha Scott
Executive Office Building
Room 147

FROM: Pat Anderson

RE: Database Services Proposal

.....
Following up on our telephone conversation today, we are pleased to submit the following proposal and prices:

1. To load on to our database system a file of approximately 600,000 records from one or more 9-track magnetic tapes.
Price: no charge
2. To maintain resulting database online in a state of confidentiality and readiness; including daily backup, monthly offsite security copy, file documentation, selection and sort computer time, and maintenance of various references and files necessary for support and quick-turnaround.
Price: \$5/1000 records/month
3. Per production request, perform pre-production database processing (necessary to set up selection, sort, output layout, etc.).
Price: \$32 per systems manager/hr. required to do setup.
(This work is generally within 1/2 hr to 1 hr for each different job.)
There is no additional charge for computer time to do the task.
4. Printing, as requested, high quality laser, upper/lower case, with output/layout as desired.

Price: Listings and reports \$.14 per output page
 Personalized Letters .35 per page
 Envelopes .16 per envelope
 Self-ad mailing labels .08 each
 Misc. forms - will quote unit price
 Large jobs - will quote special price
5. Database enhancement/cleanup work as requested.
Price: Systems manager \$32.00 hr
 Systems operator 28.00 hr

16011

- 16-F

6. Programming, as requested.

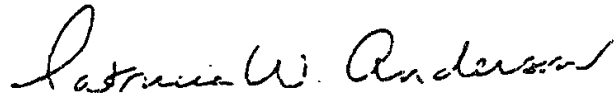
Price: \$55/hr

Please note that because of the versatility of our data management software, it is highly unlikely programming will be necessary and you would always be told ahead of time. I don't believe there were as many as 10 programming hours charged during the entire '91-'92 Clinton Primary.

7. Reimbursible expenses - our costs for related postage and shipping, messenger services and long distance telecomm.

We will be glad to commence this work as a matter of highest priority upon hearing from you. If you have any questions or concerns, please give me a call.

Sincerely,



Patricia W. Anderson
President

16012

Public Office Corporation

911 Second Street, N.E.
Washington, D.C. 20002
202 675-4900 / Fax 675-4911

November 28, 1994

Personal Note

For: Marsha Scott

Re: Prices

We want to assure you that the prices quoted in the Database Services Proposal are the same as, or, in one instance less than, those charged Vice President Gore. Specifically:

Item 2. We are charging Vice President Gore \$7./1000records/month for a lesser quantity of records vs. \$5./1000/month proposed for your database.

Items 3,4,5 and 6 Prices quoted are the same as charged Vice President Gore.

Glad to answer any questions.

Sincerely,



16013

- 16-G

Public Office Corporation

911 Second Street, N.E.
Washington, D.C. 20002
202 675-4900 / Fax 675-4911

December 19, 1994

MEMORANDUM

For: Marsha Scott
Mark Middleton

Re: FEC Audit of Clinton 1992 Primary

This may be totally unneeded, but just to make sure we want to point out that the FEC's claim that the Clinton Committee owes a large sum on account of 1992 Primary activity has absolutely nothing to do with our work. Our work in the matching funds area had to do with the way matching funds were received. The audit complaints relate with the way the money was spent. The average matchability of the submissions we managed was 99.4.

New subject. Obviously, the President is not getting credit for what he has accomplished the first two years. We believe there needs to be put together, in a very readable, professional way, a publication that might be called, simply, The Clinton Record. An organization should be formed to give this publication wide distribution, including to the Clinton "Superfile" of supporters. It could ask for modest sustaining contributions to cover costs. To have total control, it should not be managed by the DNC. (Might it also be used to garner Clinton legal funds?.)

Best wishes for the Holidays and the New Year!

Sincerely,



Patricia W. Anderson

16014

-16-H

Public Office Corporation

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TO: President Clinton's Reelection Planning Committee
Washington, D. C.

FROM: Bill and Pat Anderson
Public Office Corporation
Washington, D. C.

DATE: February 23, 1995

The standards to which the President's reelection campaign will be held are going to be pretty high. From the very beginning, his campaign will be in a "fish bowl."

His campaign must get off to a smooth, organized start and remain a sparkling example of campaign management that follows the "spirit and letter" of the law.

The FEC is expecting a shortage in early '96 and campaigns need to conserve resources and plan ahead as never before.

There is little doubt that President Clinton is in a difficult campaign climate.

Our initial contact with President Clinton began in September 1991 with our call to Little Rock information seeking the phone number of his campaign headquarters. We had substantial campaign and matching funds expertise, and we wanted to introduce ourselves.

That phone call developed into POC being responsible for getting Clinton '92 qualified to receive matching funds, tracking all contributor data and FEC expenditure data, and submitting all matching funds and FEC compliance reports for the '92 campaign.

We had the computer, the software, the personnel, the know-how, the facility, the support equipment, the proximity to the FEC, the capability to support campaign workers all over the country, and we did it.

We went about it quietly without a lot of direction; we were in Washington and the rest of the campaign was busy in Little Rock. It was a big job for an outfit like POC; we are enormously proud of our work and very happy to have had the experience. 16015

As our phone call served to introduce us in '92, we are submitting this proposal to "re-introduce" POC by outlining our ideas for '96.

16-I.1

The main points in this proposal are:

1. POC knows how to combine what we did for Clinton '92 with additional services to form a total "Information Support Center" that will help "immediately organize" the '96 reelection effort. The Center will be a professionally staffed, experienced unit that can perform essential services and disseminate vital information from inception.
 - imagine being organized from the beginning -- page 1
 - POC provides total state of readiness -- page 2
 - Center provides numerous data & support services -- page 3
 - Center to serve campaign management & workers -- page 3
 - POC offers performance guarantees & incentives -- page 4

2. POC is the most qualified to create and manage the Information and Support Center for the '96 Committee.
 - history of POC's campaign experience -- page 5
 - summary of POC's services in '92 -- page 6
 - POC's key qualifications -- page 7
 - service attitude is very important -- page 8
 - POC's software is the most experienced also -- page 9
 - benefits of quality information management -- page 10

3. There are many things to consider.
 - understanding presidential primary accounting -- page 11
 - inherent inadequacies of accounting systems -- page 12
 - POC's '92 contributions management went well -- page 13
 - "paradigm" change for expenditure management -- page 13
 - POC's proprietary software underpins quality data -- page 14
 - common mistakes made by large campaigns -- page 15
 - copy of FEC press release from '92 campaign -- pages 16-18

4. POC is ready to quietly commit the resources necessary to help the '96 Committee achieve a state of readiness, the effects of which can't help but infuse a sense of preparedness that will be inspirational throughout '96.
 - designate POC and Center will be created -- page 19
 - turnkey approach has tremendous benefits and no downside risks -- page 19
 - POC will treat discussions confidentially -- page 19

Thank you for considering this proposal. We are happy to answer your questions and meet to discuss important details.

16016

16-I.2

1. POC knows how to combine what we did for Clinton '92 with additional services to form a total "Information and Support Center" that will help "immediately organize" the '96 reelection effort. The Center will be a professionally staffed, experienced unit that can perform essential services and disseminate vital information FROM INCEPTION.

16017

16-I.3



Imagine being organized from the beginning.

A campaign is a start-up organization and EVERYTHING needs attention, all at the same time. It is understandable that a certain amount of precious time and resources are spent just getting fundamental systems and procedures organized.

Frequently, however, many mistakes are made and poor records are kept and the campaign never fully recovers from those early months of initial organization.

It's easy to see that the campaign's management, forced to make financial decisions without the support of reliable financial data, is likely to make strategic errors.

Likewise, the campaign workers are severely hampered from doing their job because basic support is lacking (contributor lists, letter & label generation, procedures, etc.).

The short-term and long-term costs of not being organized from the very beginning are incalculable.

The BENEFITS of a strong, smooth start with the ability to sustain that level of effectiveness, on the other hand, will serve the campaign and President Clinton in many ways, not the least of which will be a unifying sense of readiness that will be inspirational throughout the life of the campaign.

POC can provide the underpinnings of information and support that will ensure a smooth, strong start for the President's '96 primary campaign and avoid the common pitfalls of most start-up campaigns.

We know WHAT WILL BE NEEDED and we know HOW TO DELIVER IT because this will be our 6th presidential campaign. POC has

- the know how
- the experience
- the trained staff
- the facility
- the computer and proprietary software
- the record of reliability and trustworthiness.

POC can be ready, BEFORE the telephones are installed at the '96 reelection headquarters, to provide the support the campaign managers and workers will be desperate to have.

It is rare that a presidential primary campaign ever achieves the level of organization that POC can provide to President Clinton's '96 campaign beginning with Day #1.

16018



16-I.4

POC can provide a TOTAL STATE OF READINESS on Day #1 by:

- Being prepared to generate informational lists and diskettes to support the entire campaign organization regarding data on past contributors, supporters, workers, friends, VIP's, Cabinet, Democratic leaders, party officials, etc. by having in place a CORE DATABASE.
- Being prepared to provide historical information (over and over again, in every way imaginable) on any and all pieces of data generated by the '92 campaign as regards expenditures and contributions.
- Being prepared to support basic communications efforts and all fundraising activities using the CORE DATABASE for lists, letters, envelopes, labels, fundraising reports, diskettes of data that can be loaded into PC's, tapes for direct mail houses, etc.
- Being prepared to give guidelines, procedures, and regulations to appropriate workers -- remember, most mistakes are made by "well meaning" workers who don't know any better.
- Being prepared to support all aspects of '96 contributions tracking beginning with preparing deposits and including FEC compliance, matching funds & threshold reports, affidavit management, thank you letters, refunds, etc., and other reports and management as requested.
- Being prepared to track and monitor all aspects of '96 expenditures beginning with check writing, vendor tracking, invoice and cash flow management, budget, FEC compliance, state allocations management, and other reports as requested.
- Being prepared to support, as requested, all aspects of a mushrooming enterprise including payroll and, if necessary, document tracking and retrieval; ensure that the rising tide of activity can be supported without continuous, disruptive reorganizations.
- Being prepared to support the initiation and documentation required for a line of credit necessary to bridge "between" monthly matching funds payments in '96.

(During the '92 campaign, the Worthen Bank accepted certain affidavits from POC in support of a credit line.)

16019



16-I.5

POC proposes the creation of an INFORMATION AND SUPPORT CENTER:

POC is located in a refurbished office building at 911 Second Street, N.E., in Washington, D.C. The facility is 6 blocks from the Senate-side of the Capitol and a short walk from the Union Station Metro stop. On-site parking is available for about 20 automobiles. This building has about 6000 square feet of office space.

POC proposes:

- that POC be told they have the responsibility of having to fulfill the **TOTAL STATE OF READINESS** as outlined on the previous page,
- that POC be told they have the job of creating the **Information and Support Center for President Clinton's '96 reelection campaign,**
- that the Center be located in the POC office building,
- that POC professionally manage the Center and take care of all staffing and equipment to do the job,
- that getting the Center in shape for "opening day" is the sole responsibility of POC and will require only the **commitment of intent** by the Committee and certain assistance in obtaining necessary computer files with which to build the Core database.

The Center provides numerous services to the campaign:

- provides a state of readiness for campaign
- provides on-going support of contributions management, matching funds, and FEC reporting
- provides on-going support of expenditure management
- provides central, expert FEC compliance and state allocations reporting
- provides central document storage and repository for all FEC reports and documents tracking
- provides central unit responsible to campaign management and campaign workers
- provides a central unit AWAY from day-to-day issues not directly related to Center's activities
- provides professional, trained staff to handle vital intra-campaign services like payroll
- provides security of documents, systems, and procedures by limiting general exposure
- provides "growth" room for campaign without having to physically move the Center of support (the '92 campaign had 3 different locations)
- relieves campaign management of necessity to staff, organize, buy equipment for, hire programmers, and otherwise manage such a support Center.

16020



16-I.6

2. POC is the most qualified to create and manage the Information and Support Center for the '96 campaign.

16021

16-I.7



Major advantages of concept of Information and Support Center:

- Instantly prepares the campaign for the '96 race in support of fundraising and strategic decision making.
- Provides a unit that can support the campaign in day-to-day management of a large amount of information and documents from the very beginning.
- Saves money and time for the campaign without any downside tradeoffs in quality or timeliness of services.
- Sets up a PROFESSIONAL SERVICE UNIT REQUIRED to be totally responsive to the needs and requests of the campaign.
- Operates away from the sometimes hectic atmosphere of the central campaign headquarters.

POC Performance Incentives and Guarantees:

Charged with responsibility for the Center, POC is ready to:

- guarantee a level of service and quality of work by establishing a performance incentive based on receiving at least a 99% error-free matching funds submission grade,
- agree to performance standards so far as processing contributions in timely manner to ensure that all matching funds submissions include up to the day of submission, contributions received by the campaign,
- agree to performance standards so far as general service to campaign management and campaign workers are concerned,
- agree to certain deadline rules so that FEC reports are prepared enough ahead of time so that they can be inspected and studied by legal counsel,
- agree to necessary oversight, as requested, by the campaign management,
- agree to remain flexible in the performance of our responsibilities and consider ourselves as a service unit of the campaign, and
- agree to hire the necessary staff and to work as long and as hard in "keeping current" and, as is otherwise necessary, to provide agreed upon services.

16022



16-I.8

Campaign Experience of Public Office Corporation:

POC is the most experienced, professional organization providing comprehensive accounting, matchings funds and contributor database management, and FEC reporting to Democratic presidential primary campaigns.

- POC has had substantial roles in 5 presidential primaries,
- POC has supported numerous state-wide races for Senate, and
- POC has been in business for 17 years.

Our "pride and joy" experience was providing comprehensive data management and FEC reporting services for President Clinton's '92 presidential primary campaign.

The superlatives we achieved in matching funds for '92 are:

- best accuracy of any campaign with a 99.48% match rate (three submissions had a perfect score),
- highest total amount matched by any candidate (\$12.5 million versus \$10.6 million for Bush),
- largest number of affidavits submitted (9,107 submitted representing \$1,477,506 matched), and
- largest single submission in '92 and all of Democratic history (\$2.8 million with 64,000+ checks on it).

We are proud of our matching funds expertise and our good relationship with the matching funds division of the FEC.

Our specialty, in addition to matching funds, has been contributions management (from putting the money in the bank to thank-you letter to FEC reporting) AND expenditure management (from tracking the expenditure to bank statement balancing to FEC reporting).

We provide these services in a variety of ways and service mixes. Sometimes we do all the work and simply report to the customer; often our customers have a terminal(s) in their headquarters and rely on us for management and batch support in a crunch.

Between races, we offer our clients "continuity" services consisting of continuing FEC reports and a central place for storage of documents, database files, ad hoc reports, letters, and labels.

We view ourselves as expert "mechanics" trained and experienced in providing "back office support and data management services."

16023

16-I.9



Major Work Performed by POC for Clinton '92 Campaign:

- Prepared Clinton '92 threshold submission in record time.
- Built a database of 231,887 contributions, each check with 10 attributes and 8 summary fields.
- Built a database of 180,000 contributors, each record with 100+ fields of data including unique tracking of spouses necessary for matching funds, thank-you's & salutations.
- Prepared all ten matching funds submissions for which the Clinton '92 campaign received the maximum allowable amount.
- Applied identifying labels to 231,887 check copies & generated 695,661 check copies plus 150,000+ copies for other needs.
- Prepared & mailed 19,037 affidavit packets (wrote & signed cover letter, filled out affidavit, stamped return envelope); 10,099 were returned, most of which were usable; the Committee received \$1,477,506 by contributions validated by additional documentation.
- Developed & managed a "deposit" database consisting of 16,000+ deposit records, in-kind contributions, NSF checks, & offsets.
- Developed and managed the data system to track over 30,000 single expenditures and over 100,000 state allocations.
- Developed special state allocations and FEC line item computer report to aid in filing the FEC compliance reports.
- Developed "spread" sheet used to track the unique attributes of presidential primary campaigns.
- Responsible for preparation & filing of 15 FEC compliance reports; vendor list & NOCO statements prepared by Little Rock accounting.
- Prepared & shipped to Little Rock mailing 209,365 personalized thank-you letters and matching envelopes
- Prepared & shipped across U.S. 48,861 pages of reports & lists.
- Prepared & shipped across U.S. 50,607 mailing labels.
- Reconciled 30,000+ contributions re-designated to GELAC.
- Prepared a complete reconciliation of every bank statement.
- Processed and prepared more than 30 sets of magnetic media to support FEC reporting, direct mail, and other activities.

16024

16-I.10

