

JAN 17 2008

FEDERAL ELECTION COMMISSION  
999 E Street, N.W.  
Washington, D.C. 20463

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JAN 17 AM 11:51

**FIRST GENERAL COUNSEL'S REPORT**

**SENSITIVE**

MUR: 5918  
DATE COMPLAINT FILED: May 25, 2007  
DATE OF NOTIFICATION: June 6, 2007  
LAST RESPONSE RECEIVED: July 17, 2007  
DATE ACTIVATED: September 4, 2007  
[REDACTED]  
EXPIRATION OF SOL: June 1, 2012

**COMPLAINANT:**

Francis X. Raskauskas

**RESPONDENTS:**

Delaware State Republican Committee and  
Thomas J. Shopa, in his official capacity as  
Treasurer, a/k/a Republican State Committee of  
Delaware  
Romney for President and  
Darrell W. Crate, in his official capacity as  
treasurer  
Dave Burris  
Terry Strine

**RELEVANT STATUTES  
AND REGULATIONS:**

2 U.S.C. § 434(b)  
2 U.S.C. § 441i(e)  
11 C.F.R. § 110.11  
11 C.F.R. § 102.5  
11 C.F.R. § 102.7

**INTERNAL REPORTS CHECKED:**

Disclosure Reports

**FEDERAL AGENCIES CHECKED:**

None

**I. INTRODUCTION**

The complaint alleges that the Delaware State Republican Committee and Thomas J. Shopa, in his official capacity as treasurer, ("DSRC"); Romney for President and Darrel W.

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1 Crate in his official capacity as treasurer, ("Romney Committee"); Dave Burris, Republican  
2 Committee Sussex County Delaware Chair; and Terry Strine, Republican State Committee of  
3 Delaware Chair, (collectively "Respondents") may have violated the Federal Election Campaign  
4 Act of 1971, as amended ("the Act"), in connection with a June 1, 2007 "meet and greet and/or  
5 fund raiser for Mitt Romney" ("event"). Specifically, the complaint alleges the event raises the  
6 following issues: 1) the invitations did not appear to include the proper notifications and/or  
7 disclaimers, 2) the possible impropriety of groups other than the Romney campaign sending an  
8 e-mail invitation for the event, 3) no reporting of apparent in-kind contributions to the Romney  
9 Committee to promote and hold the event, 4) the apparent role of the DSRC as a sponsor/agent  
10 of the Romney Committee and 5) possible co-mingling of campaign and party funds because the  
11 invitations asked that checks be made payable to the DSRC. Complaint at 1. The complaint  
12 attached two e-mail invitations and accompanying electronic flyers publicizing and soliciting for  
13 the event as support for the allegations.

14 As discussed in more detail below, we recommend the Commission find no reason to  
15 believe that the DSRC violated 2 U.S.C. § 434(b) by failing to report in-kind contributions or  
16 that the DSRC or the Romney Committee violated 11 C.F.R. § 102.17 by commingling funds or  
17 otherwise participating in any joint fundraising related to the event and dismiss the remainder of  
18 the complaint's allegations.

19 **II. FACTUAL SUMMARY**

20 The DSRC sponsored an event featuring presidential candidate Mitt Romney on the  
21 grounds of Michele Rollins' private estate in Greenville, Delaware on the evening of June 1,  
22 2007. The event was a barbeque and rally. Prior to the event, the DSRC sent two e-mail  
23 invitations, which were attached to the complaint. Dave Burris, Republican Committee Sussex

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1 County Delaware Chair, sent the first e-mail invitation on May 17, 2007, with an accompanying  
2 electronic flyer invitation. See Attachment 1. The e-mail invited recipients to "Come meet my  
3 friend Mitt Romney..." The e-mail invitation contained information about the event, including  
4 the date, time, location and cost of \$15 a person or \$25 per couple. It requested an RSVP and  
5 stated that checks should be made payable to the DSRC. Attached to the e-mail was an  
6 electronic flyer entitled "DE ROMNEY FLYER with return.doc." See Attachment 2. This  
7 document reads "Please join us for a special Rally and Barbecue with Governor Mitt Romney."  
8 It features Romney's picture and name in large type across the center. It also states the date,  
9 time, and location of the event, and cost of \$15 per person or \$25 per couple. The flyer  
10 invitation asks for an RSVP and requests checks be made payable to the DSRC.

11 The bottom portion of the flyer invitation is a tear-off card to RSVP to the event. The  
12 recipient has two options on the tear-off portion: 1) "I/We will attend this important event with  
13 Governor Mitt Romney. Please Reserve \_\_\_ Tickets" and 2) "Unfortunately, I am unable to  
14 attend but enclosed please find a contribution for \_\_\_\_\_." The tear-off portion also gives space  
15 for the recipient's name, address, e-mail, work, home and cell phones, fax number, occupation  
16 and employer. The bottom of the flyer states, "Paid for by the Republican State Committee of  
17 Delaware" in a box.

18 The second e-mail invitation was sent from the DSRC e-mail list serve, DE GOP  
19 Communications, which is managed by Garrett Wozniak, the Executive Director of the DSRC,  
20 on May 23, 2007. See Attachment 3. The subject of the e-mail was "Delaware GOP Update –  
21 Gov. Mitt Romney to Visit Delaware." This e-mail described upcoming events for the DSRC  
22 and highlighted the June 1, 2007 event, which was featured first in the e-mail and in its own  
23 separate box. Romney's picture and name were in large, bold letters in the middle of the box.

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1 The text stated "Please join us for a special rally and cookout with Presidential Candidate  
2 Governor Mitt Romney." It gave the date, time, and location, the \$15 and \$25 ticket prices, and  
3 directions for parking. It also directed RSVPs to the DSRC, with the option to either e-mail or  
4 fax the completed form with credit card information, to [garrett@delawaregop.com](mailto:garrett@delawaregop.com) or to call  
5 (302) 651-0270; checks were to be payable to the DSRC.

6 This e-mail contained a hyperlink entitled "Please RSVP using the attached form." The  
7 complaint included a second electronic flyer invitation that appears to be the form attached to the  
8 e-mail through this hyperlink. See Attachment 4. It reads "Please join us for a special Cookout  
9 with Presidential Candidate Governor Mitt Romney." "Governor Mitt Romney" is in large, bold  
10 type across the middle of the flyer. It lists the date, time, and location of the event, gives  
11 information about where to park and shuttle service to the event, and states the \$15 or \$25 cost of  
12 the tickets. The flyer also states that an RSVP and payment in advance are required, and gives  
13 three ways to RSVP: by mail, e-mail or fax, and lists the phone number of the DSRC for  
14 questions. Finally, the flyer invitation states that checks can be made payable to the DSRC.

15 A tear-off card on the bottom of the flyer invitation gives the recipient two options, either  
16 "I/We will attend this important Event with Governor Mitt Romney. Please Reserve  
17 \_\_\_Tickets." Or "Unfortunately, I am unable to attend but would like to make a contribution of  
18 \_\_\_\_." Below this section is the statement:

19 \*Not printed at government expense. Contributions are not deductible as  
20 charitable donations for income tax purposes. Federal law requires political  
21 committees and individuals to report the name, mailing address, occupation, and  
22 name of employer. Contributions from corporations and foreign nationals are  
23 prohibited.  
24

25 After this statement is a form that asks for the contributor's name, address, e-mail, home  
26 phone, occupation, employer, Visa or Master Card number, name and expiration date, and the

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1 desired amount to charge on the card. At the bottom of the flyer invitation is a disclaimer, in a  
2 box, that states, "Paid for by Republican State Committee of Delaware."

3 The Respondents assert that the event was a fundraiser for the DSRC's Federal fund only.  
4 Romney Response at 1, DSRC Response at 1. They maintain the Complainant mistook the  
5 purpose of the fundraiser and therefore his allegations should be dismissed.<sup>1</sup> *Id.* Mitt Romney  
6 was a special guest at the fundraiser, but the Romney Committee did not receive any funds from  
7 the event. *Id.* The proceeds from the event were deposited in the DSRC's Federal account, and  
8 all contributions were within the limitations and prohibitions of Federal law. *Id.* Respondents  
9 also maintain that the Romney Committee was not involved in the creation or distribution of the  
10 invitations, and there were no in-kind contributions. *Id.* Finally, with respect to the issue of  
11 whether proper notifications and/or disclosures were included, the DSRC's response states that  
12 the e-mails and flyer invitations all disclosed that the event was paid for by the DSRC. DSRC  
13 Response at 2.

14 Blog postings after the event provide the following additional information. The event  
15 started at 6:00 p.m. and ended around 8:30 p.m. The official estimate of attendance was 325  
16 people, but different blogs indicated attendance of anywhere between 200 to 350 people. The  
17 food and drink at the event included hamburgers, hot dogs, sausage, cole slaw, and potato salad  
18 along with water, soda, wine and beer.

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<sup>1</sup> According to publicly available information, later the same evening, the Romney Committee hosted a \$2,300 per person private reception fundraiser and a \$1,000 per person dinner fundraiser inside the home of Michele Rollins. Posting of Dave Burris to First State Politics blog, <http://firststatepolitics.wordpress.com/2007/05/30/cleaning-up-after-wrong-williams-again/>; <http://www.delawaregrapevine.com/5-07/politicking.asp>. Neither the complaint nor the responses discussed either of these events, but these events may help explain why the complaint confuses the sponsor of the event in question.

1       **II.    LEGAL ANALYSIS**

2           **A. Pre-Event Publicity**

3           The Act provides that a candidate for Federal office shall not solicit funds in connection  
4 with an election for Federal office, including funds for any Federal election activity, unless the  
5 funds are subject to the limitations, prohibitions and reporting requirements of the Act.<sup>2</sup> 2 U.S.C.  
6 § 441i(e)(1)(A), 11 C.F.R. § 300.61. Federal candidates also cannot solicit funds in connection  
7 with any non-Federal election unless the funds are within the limits permitted by the Act and are  
8 not from prohibited sources. 2 U.S.C. § 441i(e)(1)(B), 11 C.F.R. § 300.62. "Solicit" means to  
9 ask, request or recommend, explicitly or implicitly, that another person make a contribution,  
10 donation, transfer of funds or otherwise provide anything of value. 11 C.F.R. § 300.2(m). The  
11 Commission's regulations give an example of solicitation as "providing a separate...reply device  
12 that contains an address to which funds may be sent and allows contributors or donors to indicate  
13 the dollar amount of their contribution or donation to the...political committee." 11 C.F.R.  
14 § 300.2(m)(1)(i).

15           A candidate for Federal office is permitted to attend, speak or be a featured guest at a  
16 fundraising event for a state committee of a political party. 2 U.S.C. § 441i(e)(3), 11 C.F.R.  
17 § 300.64. A state committee of a political party may advertise, announce or otherwise publicize  
18 that a Federal candidate will be the featured guest at a fundraising event, including publicizing  
19 the appearance in pre-event invitation materials and other party committee communications.

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<sup>2</sup> No person can make contributions to a candidate exceeding \$2,300 and to a state political party committee exceeding \$10,000. 2 U.S.C. § 441a(a)(1)(A) and (D). Corporations, labor organizations, federal government contractors and foreign nationals are prohibited from contributing. 2 U.S.C. § 441b(a), 2 U.S.C. § 441c(a)(1); 2 U.S.C. § 441e(a).

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1 2 U.S.C. § 441i(e)(3), 11 C.F.R. § 300.64(a). Federal candidates may speak at such events  
2 without restriction or regulation.<sup>3</sup> 11 C.F.R. § 300.64(b).

3 Here, the two electronic flyer invitations featuring Governor Romney were solicitations  
4 because they asked for contributions. See Attachments 2 and 4. Much like the example in the  
5 regulations, the flyers provided a reply device and contained an address where a contribution  
6 could be sent, as well as a space for donors to indicate the amount of money they would like to  
7 contribute.

8 The Respondents contend that the event was a fundraiser for the DSRC and that all the  
9 funds raised were deposited in the DSRC Federal account. The DSRC's 2007 July Quarterly  
10 Report supports this assertion because it discloses receipts of \$15 and \$25 for those contributors  
11 whose aggregated contributions exceeded \$200. Moreover, it discloses funds disbursed from the  
12 DSRC Federal account that may be connected to the event.<sup>4</sup> Finally, the second flyer invitation

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<sup>3</sup>The Explanation and Justification for 11 C.F.R. § 300.64 states that the regulation is carefully circumscribed and only extends to what Federal candidates and officeholders say at the State party fundraising events themselves. The regulation tracks the statutory language by explicitly allowing Federal candidates and officeholders to attend fundraising events and in no way applies to what Federal candidates and officeholders do outside of State party fundraising events. Specifically, the regulation does not affect the prohibition on Federal officeholders from soliciting non-Federal funds for State parties in fundraising letters, telephone calls or any other fundraising appeal made before or after the fundraising event. Unlike oral remarks that a Federal candidate or officeholder may deliver at a state party fundraising event, when a Federal candidate or officeholder signs a fundraising letter or makes any other written appeal for non-Federal funds, there is no question that a solicitation has taken place that is restricted by 2 U.S.C. § 441i(e)(1). Moreover, it is equally clear that such a solicitation is not within the statutory safe harbor at 2 U.S.C. § 441i(e)(3) that Congress established for Federal candidates and officeholders to attend and speak at State party fundraising events.

Revised Explanation and Justification for Candidate Solicitation at State, District, and Local Party Fundraising Events, 70 Fed. Reg. 37,649, 37,651 (June 30, 2005).

<sup>4</sup>The Report discloses disbursements of \$618.83 to a catering and party supply store on June 13, 2007; \$225.20 to a tent rental business on June 27, 2007; another \$255.36 and \$1,054.17 for equipment rental on June 13, 2007; and \$663.00 for transportation, possibly to shuttle guests from the parking lot to the event, as mentioned on the invitations, on June 27, 2007.

1 contains a reference to the requirements of Federal law.

2 Even if all of the funds did go into the DSRC Federal account, however, the solicitations  
3 failed to properly limit contributions to federally compliant funds. Both flyers contained a blank  
4 space where the contributor could write in a contribution of any amount. Attachment 2 does not  
5 contain any source limitations on contributions, and while Attachment 4 states that contributions  
6 from foreign nationals and corporations are prohibited, it does not mention government  
7 contractors or labor unions. See n.2, *supra*. Thus, the solicitation was not limited to federally  
8 permissible funds.<sup>5</sup>

9 The Commission recently considered an advisory request inquiring, in part, whether an  
10 invitation from a State party committee stating that a Federal candidate will be the featured guest  
11 and also expressly asking for non-Federal funds, with a reply card referencing the candidate, was  
12 permissible under the Act ("proposed communication 1"). Advisory Opinion 2007-11  
13 (California State Party Committees). The invitation is similar to the one in this matter, but  
14 differs in that it expressly asks for non-Federal funds.

15 The General Counsel's proposed draft concluded that proposed communication 1 violated  
16 section 441i(e) of the Act. The General Counsel's analysis was based on the structure set forth  
17 in two previous advisory opinions, 2003-03 (Cantor) and 2003-36 (Republican Governor's  
18 Association), which were issued in response to questions posed under 2 U.S.C. § 441i(e)(1)(B)  
19 and 11 C.F.R. § 300.62. The General Counsel's draft concluded that the analysis in these  
20 advisory opinions also applied to pre-event communications for a State party fundraising event  
21 governed by 11 C.F.R. § 300.64. Consistent with the analysis in Advisory Opinions 2003-03 and

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<sup>5</sup> See MUR 5799 (McCain) Factual and Legal Analysis where the Commission found reason to believe that Senator McCain violated the Act, in part because of a blank space where contributors could write in a contribution of any amount, including one that exceeded federally permissible limits. MUR 5799 is currently in the probable cause to believe stage.

1 2003-36, the General Counsel used a two step analysis to determine whether a pre-event  
2 communication complies with the restrictions on Federal candidates and officeholders soliciting  
3 non-Federal funds: (1) whether the pre-event communication constitutes a solicitation of funds;  
4 and (2) whether the Federal candidate or officeholder approved, authorized or agreed or  
5 consented to be featured, or named in, the pre-event communication. If the pre-event  
6 communication is a solicitation and the Federal candidate approves, authorizes or agrees or  
7 consents to be named or featured in the solicitation, the solicitation must contain a "clear and  
8 conspicuous express statement" that the entire solicitation is limited to funds that comply with  
9 the amount limits and source prohibitions of the Act. *Id. See also* MUR 5712 (McCain) and  
10 5799 (McCain) Factual and Legal Analyses.

11 The General Counsel's proposed draft first concluded that proposed communication 1  
12 was a solicitation under the Act that included a request for non-Federal funds. Because the  
13 Federal candidate also agreed to be featured in the pre-event communication, the General  
14 Counsel's proposed draft concluded that the solicitation violated section 441i(e) of the Act. The  
15 Commission was unable to approve, by four affirmative votes, the General Counsel's proposed  
16 draft submitted for the agenda in response to this inquiry. In a Concurring Opinion, Vice-  
17 Chairman Mason and Commissioner Von Spakovsky explained their disagreement with the  
18 proposed analysis, namely that 2 U.S.C. § 441i(e)(3) and 11 C.F.R. § 300.64 should be construed  
19 as creating a limited exception for state party fundraisers to the otherwise applicable rule that  
20 Federal candidates may not solicit non-Federal funds that do not comply with the Act's

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1 limitations and prohibitions.<sup>6</sup>

2       The Commission need not resolve the issue of whether the electronic flyer invitations in  
3 question are permissible under the Act to reach a decision in this matter. Based on the estimated  
4 325 people attending the event in question and assuming that each attendee paid the suggested  
5 individual ticket price, the maximum total amount received by the DSRC for this event would  
6 have been \$4,875 (325 people x \$15 each). While it is possible that some contributors, in  
7 response to the blank space, contributed more than \$15, it seems unlikely that they would have  
8 taken the opportunity to contribute vastly higher sums, particularly to the DSRC, given the  
9 nominal suggested price and the fact that higher ticket prices were required to attend the Romney  
10 dinner and reception on the same night. *See* n.1, *supra*. Thus, the Commission could dismiss  
11 this case as a matter of prosecutorial discretion based upon the likely low dollar amount  
12 involved. In addition, there is no evidence indicating that the DSRC and the Romney Committee  
13 commingled any funds or otherwise participated in joint fundraising activities relating to the  
14 event or that the DSRC failed to report any in-kind contributions in connection with the event.

15       Accordingly, we recommend the Commission exercise its prosecutorial discretion and  
16 dismiss the allegations in the complaint that the Delaware State Republican Committee and  
17 Thomas J. Shopa, in his official capacity as treasurer, Romney for President and Darrel W. Crate,  
18 in his official capacity as treasurer, Dave Burris, and Terry Strine violated 2 U.S.C. § 441i(e).  
19 We further recommend that the Commission find no reason to believe that the Delaware State

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<sup>6</sup> The Concurring Opinion reasons that if the analytical structure of Advisory Opinions 2003-03 and 2003-36 were applied to proposed communication 1, it would effectively strike 11 C.F.R. § 300.64(a) from the regulations and produce the added result of imputing a solicitation to a Federal candidate, despite the fact that he or she could make the same solicitation when speaking at the event. The Concurring Opinion therefore concludes that a Federal candidate's appearance on State political party pre-event invitations and other publicity as a "featured guest," even if the Federal candidate consents to appear in those materials, is entirely consistent with the terms of 2 U.S.C. § 441i(e)(3) and 11 C.F.R. § 300.64(a).

1 Republican Committee and Thomas J. Shopa, in his official capacity as treasurer, or Romney for  
2 President and Darrel W. Crate in his official capacity as treasurer, violated the rules relating to  
3 joint fundraisers, as there is no evidence that the event was such a fundraiser. See 11 C.F.R.  
4 §102.17. We also recommend the Commission find no reason to believe that the Delaware State  
5 Republican Committee and Thomas J. Shopa, in his official capacity as treasurer, failed to report  
6 any in-kind contributions to the event, in violation of 2 U.S.C. § 434(b).

7 **B. Disclaimers and Notifications**

8 The Complaint alleges that the e-mail invitations and attached invitation flyers did not  
9 have proper disclaimers. When a political committee sends electronic mail of more than 500  
10 substantially similar communications, it must include a federally compliant disclaimer, including  
11 the appropriate authorization statement. 2 U.S.C. § 441d; 11 C.F.R. § 110.11(a)(1); (b)(1) and  
12 (3). The DSRC, through Dave Burris and through Garrett Wozniak, sent electronic mail without  
13 authorization statements (and possibly other information, see 11 C.F.R. § 110.11(b)(3)) to the  
14 DSRC list-serve and to others. See Attachments 1 and 3. We do not know exactly how many e-  
15 mail invitations were sent, but since 325 people attended the event, it is possible that 500  
16 substantially similar e-mail invitations were sent by the DSRC. Again, however, the low dollar  
17 amount involved does not warrant the use of the Commission's resources to investigate how  
18 many e-mail invitations the DSRC sent for the event.

19 The Complaint also alleges the e-mail invitations and attached invitation flyers did not  
20 have proper notifications. Contributions deposited into a Committee's Federal account require  
21 one of the following: the contributions (i) have to be designated for the Federal account, (ii) have  
22 to result from a solicitation which expressly states that the contribution will be used in  
23 connection with a Federal election; or (iii) must be from contributors that are informed that all

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1 contributions are subject to the prohibitions and limitations of the Act. 11 C.F.R.

2 § 102.5(a)(2)(i)-(iii).

3 The e-mails and attached invitation flyers only state that checks should be made payable  
4 to the DSRC and did not state that funds would be used in connection with a Federal election.

5 Nothing in the publicity would have appraised contributors to designate their contributions to the  
6 DSRC Federal account. Neither of the invitation flyers expressly stated that all contributions  
7 were subject to the prohibitions and limitations of the Act, and neither included the applicable  
8 limitations nor all of the prohibitions. Therefore, the DSRC appears to have violated 11 C.F.R.

9 § 102.5(a)(2) in connection with the event. While we do not think it is worthwhile to pursue this  
10 violation because of the low dollar amount involved, we recommend a dismissal with  
11 admonishment.

12 We recommend that the Commission exercise its prosecutorial discretion and dismiss the  
13 allegations in the complaint that the Delaware State Republican Committee and Thomas J.  
14 Shopa, in his official capacity as treasurer, violated 2 U.S.C. § 441d, and dismiss with  
15 admonishment the allegation that the Delaware State Republican Committee and Thomas J.  
16 Shopa, in his official capacity as treasurer, violated 11 C.F.R. § 102.5(a) in connection with  
17 improper notifications that the fundraising event was a fundraiser for the Delaware State  
18 Republican Committee's Federal account. *See Heckler v. Chaney*, 470 U.S. 821 (1985).

19 **III. RECOMMENDATIONS**

- 20
- 21 1. Dismiss the allegations in the complaint that the Delaware State Republican  
22 Committee and Thomas J. Shopa, in his official capacity as treasurer, Romney for  
23 President and Darrel W. Crate in his official capacity as treasurer, Dave Burris,  
24 and Terry Strine violated 2 U.S.C. § 441i(e).
  - 25
  - 26 2. Dismiss the allegations in the complaint that the Delaware State Republican  
27 Committee and Thomas J. Shopa, in his official capacity as treasurer, violated  
28 2 U.S.C. § 441d.

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- 3. Dismiss the allegation in the complaint that the Delaware State Republican Committee and Thomas J. Shopa, in his official capacity as treasurer, violated 11 C.F.R. § 102.5 and send an admonishment letter to them.
- 4. Find no reason to believe that the Delaware State Republican Committee and Thomas J. Shopa, in his official capacity as treasurer, violated 2 U.S.C. §§ 434(b).
- 5. Find no reason to believe that the Delaware State Republican Committee and Thomas J. Shopa, in his official capacity as treasurer, and Romney for President and Darrel W. Crate in his official capacity as treasurer, violated 11 C.F.R. § 102.17.
- 6. Approve the attached Factual and Legal Analyses.
- 7. Approve the appropriate letters.
- 8. Close the file.

1-16-08  
Date

BY: Kathleen M. Guith  
Kathleen M. Guith  
Acting Associate General Counsel  
for Enforcement

Susan L. Lebeaux  
Susan L. Lebeaux  
Assistant General Counsel

Kathryn J. LeFebvre  
Kathryn J. LeFebvre  
Attorney

- Attachments:
- 1. E-mail invitation from Dave Burris
  - 2. Attachment to Burris e-mail
  - 3. E-mail from Garrett Wozniak
  - 4. Attachment to Wozniak e-mail

**From:**  
**To:**  
**Sent:** Friday, May 25, 2007 9:13 AM  
**Attach:** DE ROMNEY FLYER with return info.doc  
**Subject:** Come Meet My Friend Mitt

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

2007 MAY 30 A 11: 26

-----Original Message-----

**From:** Dave Burris  
**Sent:** Thursday, May 17, 2007 8:55 AM  
**To:** Dave Burris  
**Subject:** Come Meet My Friend Mitt

See below for exciting news! Come meet my friend Mitt Romney right here in Delaware.

This is a great and inexpensive opportunity for Delawareans to hear directly from the man who's leading the polls in Michigan, Iowa and New Hampshire. He's ready to shake up Washington and bring the change that the federal government needs!

Join me at Michele Rollins' house for the barbecue!

The invitation is attached.

-- Dave

Please join us for a special Rally and Barbecue with Governor Mitt Romney!!!

Friday, June 1, 2007, 7:30 p.m.

The Home of Michele Rollins, Walnut Green

\$15 per person, \$25 per couple

Because of security, RSVP is required

Please make checks payable to Republican State Committee of Delaware and RSVP to 3301 Lancaster Pike, Wilmington, DE 19805 or 302-651-0260

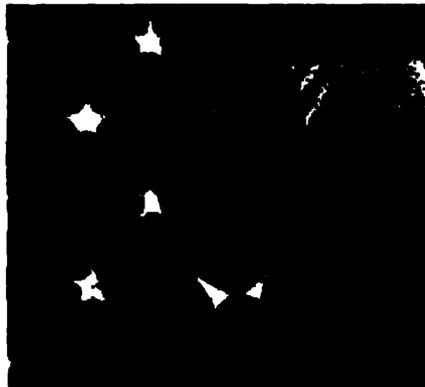
Dave Burris

Milton, DE 19968

ATTACHMENT \_\_\_\_\_  
Page \_\_\_\_\_ of \_\_\_\_\_

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Please join us for a special  
Rally and Barbecue with



# Governor Mitt Romney

Friday, June 1, 2007  
7:30 p.m.

The Home of Michele Rollins  
Walnut Green

\$15 per person, \$25 per couple

*Because of security, RSVP is required*

R.S.V.P.: 3301 Lancaster Pike, Suite 4B, Wilmington, DE 19805 (302) 651-0260  
Please make checks payable to: Republican State Committee of Delaware

I/We will attend this important Event with Governor Mitt Romney. Please Reserve  Tickets.

Unfortunately, I am unable to attend but enclosed please find a contribution for .

Name(s): \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Email: \_\_\_\_\_

Work Phone: \_\_\_\_\_ Fax number: \_\_\_\_\_

Home Phone: \_\_\_\_\_ Cell number: \_\_\_\_\_

Occupation: \_\_\_\_\_ Employer: \_\_\_\_\_

Paid for by Republican State Committee of Delaware ATTACHMENT 2

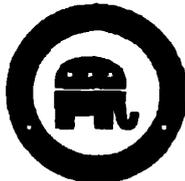
Page 1 of 1

10044272564

Frank Rostrom

From: THE GOP Commission <govet@delawaregop.com>  
To:  
Sent: Wednesday, May 23, 2007 8:20 AM  
Subject: Delaware GOP Update - Gov. Mitz Romney to Visit Delaware

DELAWAREGOP.com



**34th RD  
Community Meeting  
with Representative Don Blasey**

Date: 5/22/2007

Event Time: 7:00 PM

Location: Caesar Rodney High School  
LGI Room in the East Building

Details: Please join Representative Blasey at this Community Meeting to discuss important legislative issues.

Invited guests include State Auditor Tom Wagner, Commissioner W.G. Edmonson, State Senator Colin Borini and other local elected officials.

Please take this opportunity to come out and be briefed on issues that impact Kent County.

For more information call: 887-8723

**Fundraiser for  
Councilman Bob Weiner**

Date: 5/29/2007

Event Time: 5:30 PM

Location: Shipley Room  
Ridewood Museum  
Conference Center

Details: 5:30pm - 7:30pm  
\$45 per person

RSVP to:  
Friends of Bob Weiner  
c/o Ray Buchta,  
Treasurer  
PO Box 7888  
Wilmington, DE 19803

Or, register on-line.

**Colonial Region  
Separation Day Celebration &  
Fundraiser**

Date: 6/8/2007



RECEIVED  
LEGISLATION  
COMMISSIONER  
OFFICE OF GENERAL  
COUNSEL  
2007 MAY 30 A 11:26

Please join us for a special  
Rally and Cookout with  
Presidential Candidate  
**Governor Mitt Romney**

Friday, June 1, 2007  
7:00 p.m.

The home of Michele Rollins  
Walton Green

\$15 per person, \$25 per couple

Attendees must park at the Lower Bandywine Presbyterian Church  
101 Old Kennett Road (intersection of Kennett Pike and Old Kennett Road).

Shuttles will be provided between the Church and the event.

Parking is available beginning at 6:30 p.m.

**For security reasons, an RSVP and payment in advance are required.**

R.S.V.P. to Republican State Committee of Delaware

3301 Lancaster Pike, Suite 4B, Wilmington, DE 19805

Or, e-mail or fax the completed form with credit card information to  
govet@delawaregop.com or (302) 651-0270

For questions, please call (302) 651-0260

Please make checks payable to: Republican State Committee of Delaware

Please RSVP using the attached form.

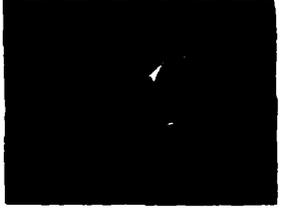
ATTACHMENT 3  
Page 1 of 4

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Event Time: 6:00 PM  
 Location: Arsenal on the Green  
 Caesar Rodney  
 Ballroom  
 Old New Castle  
 Details: \$80/person  
 Buffet, Cash Bar,  
 Silent Auction  
 Contact or mail  
 payment to:  
 Ed Cederwalle

Phone \_\_\_\_\_

Dedication of the  
 Virginia T. Greene Memorial  
 Garden  
 Date: 6/10/2007  
 Event Time: 12:00 PM  
 Location: The Stone School  
 Philadelphia Pike and  
 Darley Road  
 Details: Join the Women's  
 Republican Club  
 of Wilmington for the  
 Dedication of the  
 Virginia T. Greene  
 Memorial Garden  
 \$10/person  
 Virginia T. Greene,  
 a long time Claymont  
 resident,  
 was very active in the  
 Republican Party  
 and in WRCW.  
 For more information  
 contact:  
 Joanne Best at \_\_\_\_\_



**Thanks for an enjoyable and highly successful  
 State Committee Dinner and  
 Organizational Convention**

This past weekend's State Committee Dinner and State Convention were very successful.

With a theme of *Committing to the Future*, Delaware Republicans gathered on May 16 and 18 for the Party's annual State Committee Dinner and Convention.

At the 2007 Organizational Convention, State Party Chair Terry Strine, Party Secretary Cathy Murray and Party Treasurer Tom Shopa were all Re-Elected; Sussex County Councilman Vance Phillips became the newly-elected Party Vice-Chair.

remarking on the events, Chairman Strine noted,

*"This Convention was a wonderful event. Former Maryland Lieutenant Governor Michael Steele gave a passionate, engaging and optimistic speech about the future of the Republican Party. We will continue to work together as a united Delaware Republican Party and look forward to electing more Republicans to the benefit of all Delawareans."*

Sussex Region Chair Dave Barrie presents Judge Bill Lee with the W. Laird Stabler Award



Mike and Lisa Romano after receiving the Republican of the Year Award



Sussex County Republican Women's Club President Suzanne Bame accepts the Republican Woman of the Year Award



Governor Pete du Pont introduces former Maryland Lt. Gov. Michael Steele



**THANKS to Our 2007 Republican State Convention  
 Breakfast and Lunch Sponsors**

Congressman Mike Cook  
 State Auditor Tom Angell  
 Representative Greg Levitt  
 Representative Wood Hill  
 Representative Bill Orlin

ATTACHMENT 3  
 2 of 4

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Representative Bobby Costen  
 Representative Danny Short  
 Representative Dennis Stone  
 Senator John Still  
 Representative Pam Thorburg  
 Representative Bob Walker  
 Congressman Bob Walker  
 Romney for President  
 John McCain 2008  
 National Committeewoman John Mathewky



**CASTLE SUPPORTS NEW LOW-INCOME HOUSING FUND AND NEW OVERSIGHT OF HOUSING FINANCE SYSTEM**

Delaware Congressman Miller Castka has helped pass legislation to create a new independent agency to regulate government-sponsored enterprises (GSEs) — Freddie Mac, Fannie Mae and Federal Home Loan Banks — which expand the supply of home mortgage money by buying mortgages from lenders.

The new agency would have authority to oversee the operations of the three mortgage entities. The measure also requires that a portion of Freddie Mac's and Fannie Mae's profits be put in a new affordable housing fund to help low-income families buy homes.

The Federal Housing Finance Reform Act creates an affordable housing fund to be managed by the FHFA, from 2007 through 2011, by requiring Freddie Mac and Fannie Mae to contribute 1.5% of their total outstanding mortgages. Of that contribution, 75% of the funds would be used for the affordable housing fund, and 25% would be allocated to the federal government to keep the bill deficit neutral. In the first year of the funds operation, 75% of the funds would go to Louisiana and 25% would go to Mississippi. Only very-low and extremely-low income families would be eligible for these funds, which could be used for rental housing, homeownership, and public infrastructure activities in conjunction with housing.

"Today's legislation takes steps to address serious accounting and management weaknesses at Freddie Mac and Fannie Mae by strengthening GSE regulator authority - oversight which is long overdue. With these improvements and the establishment of a low-income housing trust fund, I believe this bill will enable us to make some progress on the serious affordable housing shortages in our country for low- and moderate-income families. I urge the Senate to make this bill a priority for consideration," said Congressman Castka.

We have received numerous calls and e-mails regarding the *Border Security and Immigration Reform Act of 2007*. Please read the following Op-Ed from former United States Senate Candidate Jan Ting

**Latest reform is just amnesty by a new name**  
 by Prof. Jan Ting

On May 17, U.S. Senate conferees reached agreement on "comprehensive immigration reform," which is a euphemism for amnesty for illegal immigrants, which all acknowledge that, if properly labeled as such, the American people will not support.

Amnesty is anything that rewards violation of U.S. immigration law by putting illegal immigrants in a better position than either would-be immigrants who have respected our laws and remained outside our borders. The U.S. Senate agreement does this by granting illegal immigrants, and only illegal immigrants, "probationary" legal status as the first step on a pathway to citizenship, both of which many millions of others outside our borders wish they could have, too. Payment for any back taxes due is hardly an excuse for amnesty, since those back taxes are already due and payable in any event. Payment of fines does not remove the taint of amnesty when those fines are in lieu of normal processing fees that would be required for legal immigration.

Like the previous amnesty enacted in 1986, which led to the dramatic increases in illegal immigration we have experienced since then, the May 17 amnesty agreement will only attract new and larger waves of illegal immigrants to the U.S. The alleged benchmarks for implementation of the amnesty agreement do not require any reduction in the number of illegal immigrants in or entering the United States each year, only that additional tax money be spent to hire personnel and to attempt to improve border and technical infrastructure.

The May 17 agreement will also dramatically and unnecessarily increase the already historically high levels of legal immigration to the United States. The United States already admits each year more legal immigrants with a clear path to full citizenship than all the rest of the nations of the world combined. The May 17 agreement, when fully implemented, will more than double the number of legal immigrants every year. And a temporary worker program will open up an entirely new channel for legal and permanent immigration to the U.S.

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ATTACHMENT 3  
 Page 3 of 4

The proposed amnesty and increased legal immigration will import poverty and new competition for the remaining American jobs that have not yet been outsourced. The agreement if enacted will increase public school enrollment, necessitating increased school taxes. It will put additional demands and pressures to overwhelm our already stressed health care and criminal justice systems.

Anyone who has had to deal with the federal immigration bureaucracy recently understands that the bureaucracy is overwhelmed by its current workload, with backlogs in everything from visa processing, to security screening, to naturalization processing. To add to that workload millions of applications for amnesty, or "probationary status," is a formula for tax increases at best, and disaster at worst.

The American people should refuse to be played for fools by the U.S. Senate compromisers. H.R. 4437 as enacted by the U.S. House of Representatives 17 months ago would have reformed U.S. immigration policy and secured the border without rewarding violators of U.S. immigration law with amnesty. If that true reform can't be enacted, no legislation at all is better than the bad legislation proposed by the U.S. Senate.

Instead of legislation, we need leadership with the political will to enforce existing laws. It's a strawman to observe that deporting 12 million illegal immigrants would be a daunting task.

No one is saying that applying the law to illegal immigrants can be done overnight. But the alternative to doing nothing, as we are now, is to do something, to begin to enforce immigration laws, at our borders and internally, to gradually reduce the numbers of illegal immigrants through law enforcement.

American citizens and legal immigrants should urge all members of Congress and candidates for public office to oppose the May 17 U.S. Senate compromise on so-called "comprehensive immigration reform."

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ATTACHMENT 3  
Page 4 of 4

Please join us for a special  
Rally and Cookout with  
Presidential Candidate  
**Governor Mitt Romney**

Friday, June 1, 2007

7:00 p.m.

The home of Michele Rollins  
Walnut Green

*\$15 per person, \$25 per couple*

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Parking is available beginning at 6:30 p.m.

*For security reasons, an RSVP and payment in advance are required.*

R.S.V.P. to Republican State Committee of Delaware  
3301 Lancaster Pike, Suite 4B, Wilmington, DE 19805  
Or, e-mail or fax the completed form with credit card information to  
[garrett@delawaregop.com](mailto:garrett@delawaregop.com) or (302) 651-0270  
For questions, please call (302) 651-0260  
Please make checks payable to: Republican State Committee of Delaware

\_\_\_ I/We will attend this important Event with Governor Mitt Romney. Please Reserve \_\_\_ Tickets.  
\_\_\_ Unfortunately, I am unable to attend but would like to make a contribution of \_\_\_\_\_.

\*Not printed at government expense. Contributions are not deductible as charitable donations for income tax purposes. Federal law requires political committees and individuals to report the name, mailing address, occupation, and name of employer. Contributions from corporations and foreign nationals are prohibited.

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Address: \_\_\_\_\_

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Email: \_\_\_\_\_ Home Phone: \_\_\_\_\_

Occupation: \_\_\_\_\_ Employer: \_\_\_\_\_

Visa or M/C #: \_\_\_\_\_ Name on Card: \_\_\_\_\_

Exp. Date: \_\_\_\_\_ Amount: \_\_\_\_\_

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