



Emily Anne Staples Tuttle papers.

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First Federal

First Federal
Savings and Loan Association
of Minneapolis

77 South Seventh Street
Minneapolis, Minnesota 55402

FROM: Emily Staples Fact Fund
TO: Minnesota's Groweing

04 058161

90-4014/1222

DEC 28 88

Account No.

Pay to the Order of

004-7057375

Marilyn J. Brummer

\$ 804.61

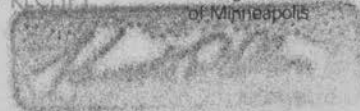
NOT NEGOTIABLE

Insured Savings

Federal Home Loan Bank of San Francisco
Walnut, California

PURCHASERS RECEIPT

First Federal
Savings and Loan Association
of Minneapolis





PERMANENT ADDRESS CORRECTION REQUESTED



473-9120

PRESORTED
FIRST CLASS



TO LARRY MAROFsky, attorney.
(co signer)
535-2122 - office
544-9685 - home

MB

First Federal**Statement**

STAPLES FACT
C-O MARILYN J BRUMMER
3525 THE MALL
MTKA MN 55343

FIRST FEDERAL IS PLEASED TO INTRODUCE A NEW FORMAT ON YOUR STATEMENT. THIS IMPROVED FORMAT PROVIDES AN EASY-TO-READ, UNDERSTANDABLE RECAP OF YOUR ACCOUNT ACTIVITY.

IF YOU HAVE ANY QUESTIONS ABOUT YOUR STATEMENT, PLEASE CALL 371-7131 AND ONE OF OUR CUSTOMER SERVICE REPRESENTATIVES WILL BE HAPPY TO HELP YOU.

DETAIL ACCOUNT INFORMATION

SAVINGS CERT
004 7057375

STAPLES FACT
C-O MARILYN J BRUMMER
TAX ID NUMBER 411388467

INTEREST
RATE
7.750%

SUMMARY

BALANCE AS OF 6/29/85	809.35
DEPOSITS, INTEREST AND OTHER ADDITIONS	22.64
BALANCE AS OF 10/04/85	831.99
INTEREST EARNED THIS YEAR	65.41
MATURITY DATE	10/02/86

LIST OF ACTIVITY

DATE	DESCRIPTION	AMOUNT	BALANCE
9/26	INTEREST	22.64	831.99

*lose interest
180 days
from last year*
 $\$831.99$
 $\$31.79$
 $\$800.20$

DIRECT
INQUIRIES TO

FIRST FEDERAL SAVINGS & LOAN ASSOCIATION OF MINNEAPOLIS
77 SOUTH SEVENTH STREET, MINNEAPOLIS, MN 55402
CUSTOMER SERVICE 612-371-7131

4113884670

The Federal Truth in Lending Act requires prompt correction of billing mistakes.

The Federal Truth in Lending Act requires prompt correction of billing mistakes.

1. If you want to preserve your rights under the Act, here's what to do if you think your bill is wrong or if you need more information about an item on your bill:
 - a. **Do not write on the bill.** On a separate sheet of paper write (you may telephone your inquiry but doing so will not preserve your rights under this law) the following:
 - i **Your name and account number.**
 - ii A description of the error and an explanation (to the extent you can explain) why you believe it is an error. If you only need more information, explain the item you are not sure about and, if you wish, ask for evidence of the charge such as a copy of the charge slip. Do not send in your copy of a sales slip or other document unless you have a duplicate copy for your records.
 - iii The dollar amount of the suspected error.
 - iv Any other information (such as your address) which you think will help us to identify you or the reason for your complaint or inquiry.
 - b. Send your billing error notice to the address on your bill which is listed after the words: "Direct Inquiries To:" Mail it as soon as you can, but in any case, early enough to reach us **within 60 days** after the bill was mailed to you.
2. We must acknowledge all letters pointing out possible errors **within 30 days** of receipt, unless we are able to correct your bill during that 30 days. **Within 90 days** after receiving your letter, we must, either correct the error or explain why we believe the bill was correct. Once we have explained the bill, we have no further obligation to you even though you still believe that there is an error, except as provided in paragraph 5 below.
3. After we have been notified, neither we, nor an attorney, nor a collection agency may send you collection letters or take other collection action with respect to the amount in dispute; but periodic statements may be sent to you, and the disputed amount can be applied against your credit limit. You cannot be threatened with damage to your credit rating or sued for the amount in question, nor can the disputed amount be reported to a credit bureau, or to other creditors as delinquent until we have answered your inquiry. However, you remain obligated to pay the parts of your bill not in dispute.
4. If it is determined that we have made a mistake on your bill, you will not have to pay any finance charges on any disputed amount. If it turns out that we have not made an error, you may have to pay finance charges on the amount in dispute, and you will have to make up any missed minimum or required payments on the disputed amount. Unless you have agreed that your bill was correct, we must send you a written notification of what you owe; and if it is determined that we did make a mistake in billing the disputed amount, you must be given the time to pay which you normally are given to pay undisputed amounts before any more finance charges or late payment charges on the disputed amount can be charged to you.
5. If our explanation does not satisfy you and you notify us in writing within **10 days** after you receive our explanation that you still refuse to pay the disputed amount, we may report you to credit bureaus and other creditors and may pursue regular collection procedures. But we must also report that you think you do not owe the money, and we must let you know to whom such reports were made. Once the matter has been settled between you and us, we must notify those to whom we reported you as delinquent of the subsequent resolution.
6. If we do not follow these rules, we are not allowed to collect the first **\$50** of the disputed amount and finance charges, even if the bill turns out to be correct.
7. If you have a problem with property or services purchased with a credit card, you may have the right not to pay the remaining amount due on them, if you first try in good faith to return them or give the merchant a chance to correct the problem. There are two limitations on this right.
 - a. You must have bought them in your home state or if not within your home state within **100 miles** of your current mailing address; and
 - b. The purchase must have been more than **\$50**.

However, these limitations do not apply if the merchant is owned or operated by us, or if we mailed you the advertisement for the property or services.

PLEASE REPORT ANY ERRORS PROMPTLY

IF YOUR ACCOUNT DOES NOT BALANCE,
PLEASE CHECK THE FOLLOWING CAREFULLY.

NUMBER/MERCHANT	AMOUNT	
TOTAL \$		

Current Balance

From Statement\$ _____

Add: Deposits

NOT Included in _____

This Statement _____

Total \$ _____

Less: Checks/Withdrawals Outstanding _____

Revised Current

Balance \$ _____

Your Register

Balance \$ _____

Add:

Interest Earned \$ _____

Less: Service

Charges

Less: Taxes
Withhold

withheld. *****

Revised Register Balance \$

☐ HAVE YOU CORRECTLY ENTERED THE AMOUNT OF EACH CHECK/WITHDRAWAL IN YOUR REGISTER?

☐ ARE THE AMOUNTS OF YOUR DEPOSITS ENTERED IN YOUR REGISTER THE SAME AS THOSE SHOWN ON THIS STATEMENT?

☐ HAVE ALL CHECKS/WITHDRAWALS BEEN DEDUCTED FROM YOUR REGISTER BALANCE?

☐ HAVE YOU DEDUCTED ALL SERVICE CHARGES FROM YOUR REGISTER BALANCE?

☐ HAVE YOU CHECKED ALL ADDITIONS AND SUBTRACTIONS IN YOUR REGISTER?

☐ HAVE YOU CARRIED THE CORRECT BALANCES FORWARD WHEN ENTERING CHECKS/WITHDRAWALS OR DEPOSITS?

☐ HAVE YOU ENTERED ALL OVERDRAFT TRANSFERS IN YOUR REGISTER?

☐ HAVE YOU ENTERED ALL BANK CARD AND AUTOMATIC TRANSFER TRANSACTIONS IN YOUR REGISTER?

*THESE TOTALS SHOULD AGREE

Any Charge for Imprinted Checks Includes State Sales Tax Computed at the Current Rate, When Applicable

The **FINANCE CHARGE** is computed by applying the daily periodic rate shown on the monthly statement to the Average Daily Balance shown on the monthly statement. The Average Daily Balance of the account is the sum of the unpaid balances in the Reserve Account at the end of each day during the billing period (excluding **FINANCE CHARGES**), divided by the number of days in the billing period. **FINANCE CHARGES** accrue from the date a Reserve Account advance is posted to the account.

A. Minimum Payment, at the rate/amount shown on the monthly statement, plus any prior unpaid Minimum Payment, must be made by the Minimum Payment Due Date, unless other arrangements have been made.

Amounts over the limit of the Reserve Account are immediately due and payable, and may be paid in part or in full at any time by a charge or charges made against available funds in your checking account.

Payments may be made at any time to reduce the Reserve Account balance. Payments in excess of the Reserve Account balance on the date received will be credited to your checking account. All payments will be applied first to **FINANCE CHARGES** and then to the Reserve Account advances. Deposits to your checking account will not reduce the Reserve Account balance unless other arrangements have been made.

Payments (not including automatic deductions) must be received by 8 a.m. to be credited to your account as of the day received. If any such payment is made at any location other than the address shown on the face side of this monthly statement, there may be a delay of up to 5 days in crediting the payment to your account.

STATEMENT

SAVINGS

ACCOUNT NUMBER

STATEMENT DATE

PAGE

12/31/84

1



STAPLES FACT
C-O MARILYN J BRUMMER
3525 THE MALL
MTKA MN 55343

PLEASE ADVISE US OF ANY CHANGES OF ADDRESS

DIRECT INQUIRIES TO

77 SOUTH 7TH STREET
MINNEAPOLIS MN 55402 (612) 371 3700

ALL EARNINGS TOTALING \$10.00 OR MORE WILL BE REPORTED TO THE IRS. KEEP THIS FORM FOR YOUR TAX RECORDS - DO NOT ATTACH THIS FORM TO YOUR INCOME TAX RETURN.

INTEREST RATE 11.100%

TAX IDENTIFICATION # 411 38 8467

BEGINNING BALANCE	INTEREST EARNED	TAXES WITHHELD	INTEREST PENALTY	ENDING BALANCE
745.94	20.64	.00	.00	766.58
MATURITY DATE 10/02/85	1984 TOTALS	20.64	.00	.00

DATE	DESCRIPTION	--LIST OF DAILY ACTIVITY--	AMOUNT	BALANCE
	LAST STATEMENT			745.94
12/27	INTEREST		20.64	766.58

FIRST FEDERAL CAN LEND YOU THE MONEY FOR WHATEVER YOU
HAVE IN MIND. WE OFFER COMPETITIVE RATES ON LOANS FOR
A VARIETY OF REASONS: NEW CAR, HOME IMPROVEMENTS OR
EDUCATION. CALL ONE OF OUR 34 CONVENIENT OFFICES TODAY
FOR DETAILS. ASK ABOUT OUR HOME EQUITY LINE OF CREDIT.

DIRECT
INQUIRIES TO: FIRST FEDERAL SAVINGS AND LOAN ASSN OF MINNEAPOLIS
77 SOUTH 7TH STREET
MINNEAPOLIS MN 55402 (612) 371 3700

ACCOUNT NUMBER

STATEMENT DATE

PAGE

12/31/84

1

PAYER'S NAME, ADDRESS AND FEDERAL ID NUMBER FIRST FEDERAL SVGS AND LOAN ASSN OF MPLS 77 SOUTH 7TH STREET MINNEAPOLIS, MN 55402 41-0255960	EARNINGS \$50.63	FORFEITURE \$.00
	TAX WITHHELD \$.00	BALANCE \$766.58
	RECIPIENT'S ID NUMBER 41-1388467	
RECIPIENT'S NAME AND ADDRESS STAPLES FACT C-O MARILYN J BRUMMER 3525 THE MALL MTKA MN 55343		

1984

Statements for Recipients of

Interest Income

FORM 1099-INT

This is important tax information and is being furnished to the Internal Revenue Service. If you are required to file a return, a negligence penalty will be imposed on you if this income is taxable and the IRS determines that it has not been reported.

KEEP THIS FORM FOR YOUR TAX RECORDS. DO NOT ATTACH THIS FORM TO YOUR INCOME TAX RETURNS.

THE ABOVE REPORTED AMOUNTS FOR EARNINGS, FORFEITURE AND TAX WITHHELD ARE TOTALS FOR THE ACCOUNTS DESCRIBED IN DETAIL BELOW.

ACCOUNT APL	INTEREST	FORFEITURE	TAX WITHHELD	12/31/84 BALANCE
██████████ SAV	29.99	:00	:00	:00
██████████ SAV	20.64	:00	:00	766.58



DIRECT
INQUIRIES
TO:

FIRST FEDERAL
SAVINGS AND LOAN ASSN.
77 SOUTH 7TH STREET
MINNEAPOLIS, MN 55402

Interest information has been forwarded to the Internal Revenue Service. Please keep this copy for your records. Do NOT attach to income tax form. If tax ID number is not shown, please furnish in writing.

ASSN 98
PAGE 1

STATEMENT OF ACCOUNT AND EARNINGS

PLEASE RETAIN THIS 1099-INT FOR
FILING YOUR TAX RETURN

STAPLES FACT FUND
C/O MARILYN J BRUMMER
3525 THE MALL
MTKA MN 55343

PERIOD FROM

TO YEAR END 1981

TAX ID 41-1388467

DESCRIPTION	DATE	TRANSACTION AMOUNT	BALANCE
5.50 PERCENT ACCOUNT NO. 047011819			
ACCOUNT BALANCE			641.86
YEAR TO DATE INTEREST EARNED 23.75			

INTEREST SUMMARY			

*** 1099-INT TOTALS ***			
1981 INTEREST EARNED 23.75			

FOR GENERAL QUESTIONS ABOUT
YOUR ACCOUNT, CALL COLLECT:

(612)371-3700

TO VERIFY DIRECT DEPOSIT
OF FUNDS, CALL COLLECT:

(612)371-3700

1099-INT

CORR = CORRECTION, DEP = DEPOSIT, INT = INTEREST, SVCG = SERVICE CHARGE, WDL = WITHDRAWAL

PLEASE KEEP THIS COPY FOR YOUR RECORDS. IF TAX ID NUMBER IS NOT SHOWN, PLEASE FURNISH IN WRITING.



DIRECT
INQUIRIES
TO:

FIRST FEDERAL
SAVINGS AND LOAN ASSN.
77 SOUTH 7TH STREET
MINNEAPOLIS, MINN. 55402

Interest information has been forwarded to the Internal
Revenue Service. Please keep this copy for your records.
Do NOT attach to income tax form. If tax ID number is
not shown, please furnish in writing.

ASSN 98
PAGE 1

STATEMENT OF ACCOUNT AND EARNINGS

PLEASE RETAIN THIS 1099-INT FOR
FILING YOUR TAX RETURN

STAPLES FACT FUND
C/O MARILYN J BRUMMER
3525 THE MALL
MINNETONKA MN 55343

PERIOD FROM

TO YEAR END 1980

TAX ID

DESCRIPTION	DATE	TRANSACTION AMOUNT	BALANCE
5.50 PERCENT PASSCARD ACCOUNT BALANCE	NO. 047011819		113.11
YEAR TO DATE INTEREST EARNED	1.11		
*** 1980 TOTAL INTEREST EARNED	1.11	*****	*****

FOR GENERAL QUESTIONS ABOUT
YOUR ACCOUNT, CALL COLLECT:

(612)371-3700

TO VERIFY DIRECT DEPOSIT
OF FUNDS, CALL COLLECT:

(612)371-3700

1099-INT

CORR = CORRECTION, DEP = DEPOSIT, INT = INTEREST, SVCG = SERVICE CHARGE, WDL = WITHDRAWAL

PLEASE KEEP THIS COPY FOR YOUR RECORDS. IF TAX ID NUMBER IS NOT SHOWN, PLEASE FURNISH IN WRITING.



First Federal Savings
The Complete Financial Center

Statement

ACCOUNT NUMBER COMBINED
STATEMENT DATE 12/31/83
PAGE 1

1099-INT

STAPLES FACT
C/O MARILYN J BRUMMER
3525 THE MALL
MTKA MN

55343

PLEASE ADVISE US OF ANY CHANGES OF ADDRESS

DIRECT INQUIRIES TO:

77 SOUTH 7TH STREET
MINNEAPOLIS MN 55402

ALL EARNINGS TOTALING \$10.00 OR MORE WILL BE REPORTED TO THE IRS. KEEP THIS FORM FOR YOUR TAX RECORDS - DO NOT ATTACH THIS FORM TO YOUR INCOME TAX RETURN

			INTEREST EARNED	TAXES WITHHELD	INTEREST * PENALTY	ENDING BALANCE
ACCOUNT NO 004 7011819				INTEREST RATE 5.500		
			9.79			715.95
		1983 TOTALS	38.06	.00		

TOTAL FOR 1 ACCOUNT

TAX IDENTIFICATION # 411 38 8467

			9.79			715.95
			38.06			

SPECIAL NOTICE **PLEASE FILL OUT AND RETURN**

If your taxpayer identifying number (usually your Social Security number) is NOT printed on the enclosed form #1099, you are required by law to furnish your number to your savings and loan association.

Would you please fill out the blanks below and bring or mail to our office immediately.

Name _____

Savings Account No. _____

Social Security or Other Taxpayer's Identifying No. _____

* see message from Commissioner of Internal Revenue on reverse side.

A message from the Commissioner of Internal Revenue

The law requires business and financial institutions to request the "taxpayer identifying number" (usually the Social Security number) of each person to whom they make payments which must be reported to the Internal Revenue Service. Each person is required to furnish his taxpayer identifying number when requested.

The law provides a penalty for failure to do this. The Service is taking steps to assert the penalty where it is warranted.

The records of the payer who has forwarded this message to you do not show that you have furnished your taxpayer identifying number to him. We must have this number on information returns reporting payments made to you by the payer in order to process them efficiently by our computer system.

Commissioner of Internal Revenue

NOTICE OF CERTIFICATE MATURITY

FIRST FEDERAL SAVINGS AND LOAN
77 SOUTH 7TH STREET
MINNEAPOLIS MN 55402

Your Savings Certificate, identified below, matures on the date indicated. If we do not hear from you within the grace period stated on the certificate, as a convenience to you, we will renew the certificate at the issue rate in effect on its maturity date.

CERTIFICATE NUMBER	CERTIFICATE TYPE	BALANCE	MATURITY DATE	INTEREST RATE
0047057375	43	809.35	10/02/85	11.100

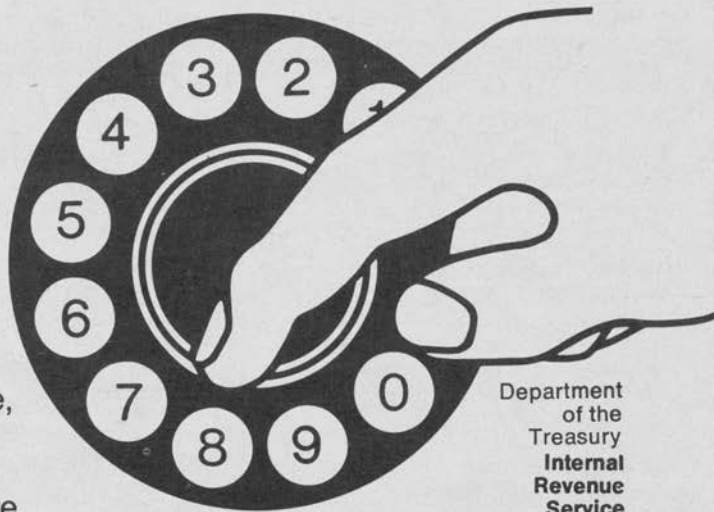
STAPLES FACT
C-O MARILYN J BRUMMER
3525 THE MALL
MTKA MN 55343



Questions? Call IRS Toll-Free

If you have any questions about the enclosed correspondence, please call your Toll-Free telephone number shown on the reverse side of this notice.

If you are sending a payment or writing to the Internal Revenue Service, please use the address shown on the enclosed correspondence to ensure prompt attention.



Department
of the
Treasury
**Internal
Revenue
Service**

Notice 360 (Rev. 5-79)

GPO 695-906

Please use a local CITY number listed below only if it is not a long-distance call for you. Otherwise, use the general Toll-Free number shown for your State.

If your State is not listed, please consult your telephone directory for the number of your local office.

To help us provide courteous responses and accurate information, IRS occasionally monitors telephone calls. No record is kept of the taxpayers name, address, or social security number.

ALASKA

Anchorage, 276-1040
Elsewhere in Alaska, call
Operator and ask for
Zenith 3700

ARIZONA

Phoenix, 257-1233
Tucson, 882-4181
Elsewhere in Arizona,
800-352-6911

COLORADO

Colorado Springs, 634-6684
Denver, 825-7041
Elsewhere in Colorado,
800-332-2060

IDAHO

Boise, 336-1040
Elsewhere in Idaho,
800-632-5990

MINNESOTA

Minneapolis, 291-1422
St. Paul, 291-1422
Elsewhere in Minnesota,
800-652-9062

MONTANA

Helena, 443-2320
Elsewhere in Montana,
1-800-332-2275

NEBRASKA

Lincoln, 477-6081
Omaha, 422-1500
Elsewhere in Nebraska,
800-642-9960

NEVADA

Las Vegas, 385-6291
Reno, 784-5521
Elsewhere in Nevada,
800-492-6552

NORTH DAKOTA

Fargo, 293-0650
Elsewhere in North Dakota,
800-342-4710

OREGON

Eugene, 485-8285
Medford, 779-3375
Portland, 221-3960
Salem, 581-8720
Elsewhere in Oregon,
800-452-1980

SOUTH DAKOTA

Aberdeen, 225-9112
Elsewhere in South Dakota,
800-592-1870

UTAH

Salt Lake City, 524-4060
Elsewhere in Utah,
1-800-662-5370

WASHINGTON

Everett, 259-0861
Seattle, 442-1040
Spokane, 456-8350
Tacoma, 383-2021

Elsewhere in Washington
800-732-1040

WYOMING

Cheyenne, 635-4124
Elsewhere in Wyoming,
800-525-6060

Department of the Treasury
Internal Revenue Service

123

29242556

STAPLES FACT FUND
MARILYN J BRUMMER TREAS
3525 THE MALL
MINNETONKA

MN 55343

Date of This Notice

If you inquire about
your account, please
refer to this
number or attach a
copy of this notice

01-06-81
Employer Identification Number
41-1388467

575 N

NOTICE OF NEW EMPLOYER IDENTIFICATION NUMBER ASSIGNED

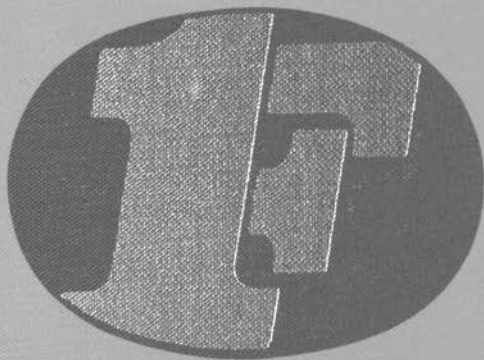
Thank you for your application for an employer identification number. The number above has been assigned to you. We will use it to identify your business tax returns and any other related documents, even if you have no employees.

Please keep this number in your permanent records. Use the number and your name, exactly as shown above, on all Federal tax forms that require this information, and refer to the number in all tax payments and in tax-related correspondence or documents. You may wish to make a record of the number for reference in case this notice is lost or destroyed.

We appreciate your cooperation.

FIRST
FEDERAL
SAVINGS

AND LOAN ASSOCIATION



DAILY INTEREST ACCOUNT

First Federal Savings and Loan Association of Minneapolis

604-7011819

CHARTERED AND SUPERVISED BY THE UNITED STATES GOVERNMENT

	Date	Memo	Interest	Withdrawals	Deposits	Balance	
1	NOV2580	PH			65.00	65.00	01
2							
3	DEC0480	P			100.00	165.00	03
4	DEC0980	P			272.00	437.00	04
5	DEC1580	P			65.00	502.00	05
6	DEC1980	WCI		400.00		102.00	06
7	DEC3180	INT	1.11			103.11	07
8	DEC3080	PH			10.00	113.11	08
9	JAN1581	PH			105.00	218.11	09
10	MAR3181	INT	2.74			220.85	10
11	JUN2281	PH			400.00	620.85	11
12							

13	99-99-99	IN	85.31			706.16	
14	12-27-83	IN	9.79			715.95	
15	03-27-84	IN	9.79			725.74	
16	06-27-84	IN	9.92			735.66	
17	09-25-84	IN	10.17			745.83	
18	10-02-84	IN	0.11			745.94	
19	10-02-84	JE		745.94		0.00	
20							
21							
22							
23							
24							

ACCT. CLOSED

PLEASE PRESENT PASSBOOK WHEN MAKING WITHDRAWALS.

First Federal Savings and Loan Association of Minneapolis

*The
Complete
Financial
Center*

Receipt
Thank You



SAVINGS



CHECKING

DATE	MEMO	WITHDRAWALS	DEPOSITS	* BALANCE
10-28-85	LC	804.61		0.00
ACCT. CLOSED				

The above transaction(s) will either appear on your next monthly statement or will be entered when your passbook is presented.

*Balance will appear for Savings only.

First Federal Savings CERTIFICATE

1. ACCOUNT SUMMARY SECTION

Accountholder(s): Staples Fact Fund

Account Number: [REDACTED] Date of Issuance: Oct. 2, 1984

Opening Balance: \$ 745.94 Rate of Earnings: 11.10 % per annum

Minimum Balance Requirement: \$ 500 Minimum Addition: \$ NOT ALLOWED

Renewal Term: SEE SECTION 4 Initial Maturity Date: Oct. 2, 1985

Frequency of Compounding: Quarterly

Earnings Distribution Dates: Beginning Dec. 1984 and Quarterly
thereafter, with the last distribution on the final maturity date.

See reverse side for Sections 2 through 5.

ACCT. CLOSED



2. GENERAL SECTION

This certifies that the Accountholder holds a savings account with the Opening Balance and for the initial term expiring on the Initial Maturity Date shown hereon in First Federal Savings and Loan Association of Minneapolis, Minnesota.

3. EARNINGS SECTION

This account shall receive earnings at the Rate of Earnings and with the Frequency of Compounding as above set forth. Such earnings shall be payable on the Earnings Distribution Dates above set forth, provided the balance in the account is not reduced below the Minimum Balance Requirement. If such balance is reduced below the Minimum Balance Requirement, the Rate of Earnings on the remaining balance shall thereafter be reduced to the rate then paid on regular savings accounts (also see Section 5).

4. RENEWAL SECTION

This account shall be automatically renewed at the close of business on the Initial Maturity Date or on the maturity date of any Renewal Term unless (1) withdrawn within the 7-day period referred to in Section 5 hereof, or (2) at least 15 days prior to a renewal date, the Association gives written notice to the Accountholder that this account will not be renewed at an Earnings Rate set forth in Section 3 and/or for the Renewal Term set forth in Section 1. In such latter event, upon maturity the account will either be renewed at such Rate of Earnings and/or for such different term as set forth in said written notice, or will be converted to a regular savings account and receive earnings at the rate then paid on regular savings accounts.

5. PENALTY CLAUSE SECTION

Except as otherwise provided herein, in the event of any withdrawal of principal from this account prior to a maturity date, the

Accountholder shall forfeit an amount equal to six months of interest or dividends whether earned or not, on the amount withdrawn at the nominal (simple interest) rate being paid on the account, regardless of the length of time the funds withdrawn have remained in the account. The penalty prescribed herein will not be imposed for withdrawal of principal following the death or adjudication of incompetence of any Accountholder. Any withdrawal which reduces the account balance below the Minimum Balance Requirement shall be considered as a withdrawal of the entire account balance and shall be subject to the penalty prescribed herein. Earnings credited to this account during any term may be withdrawn at any time during such term without penalty. If the account is renewed at the same Earnings Rate, earnings during the preceding term as well as the current term may be withdrawn at any time without penalty during the Renewal Term. If the Renewal Term rate is different, earnings in the account at the commencement of the Renewal Term shall be deemed merged with the principal and only earnings for the Renewal Term may be withdrawn at any time without penalty during such term. However, accrued and uncredited earnings on any such withdrawn earnings will be forfeited. If the account or any portion thereof is withdrawn not more than 7 days after a maturity date, earnings shall be paid thereon at the Rate of Earnings above set forth to the date of withdrawal without penalty. To the extent necessary to comply with these requirements, deductions shall be made from the amount withdrawn or the remaining account balance.


First Federal Savings



BASSFORD, HECKT, LOCKHART & MULLIN, P. A.

FORMERLY

RICHARDS, MONTGOMERY, COBB & BASSFORD, P. A.

LAWYERS

1520 PILLSBURY CENTER

MINNEAPOLIS, MINNESOTA 55402

(612) 333-3000

CHARLES A. BASSFORD
MELVIN D. HECKT
GREER E. LOCKHART
WILLIAM E. MULLIN
MACLAY R. HYDE
LYNN G. TRUESDELL
JEROME C. BRIGGS
L. H. MAY, JR.
JOHN M. DEGNAN
KEVIN P. KEENAN
REBECCA L. MOOS
JOHN M. ANDERSON
CHARLES E. LUNDBERG
GREGORY P. BULINSKI
THOMAS H. RUTTEN

RICHARD L. LUTHER
OF COUNSEL

EDMUND T. MONTGOMERY
RETIRED

FRED B. SNYDER (1859-1951)
EDWARD C. GALE (1862-1943)
FRANK A. JAMES (1908-1959)
NATHAN A. COBB, SR. (1905-1976)
BERGMANN RICHARDS (1888-1978)

November 29, 1980

Ms. Emily Ann Staples
1640 Zanthus
Plymouth, Minnesota 55447

Dear Emily Ann:

The purpose of this letter is to clarify our agreement concerning legal fees. Our agreement contemplates prompt payment of fees when billed. However, a bill will not be submitted until the DFL Caucus is ready to act on payment of this bill. Your obligation to make payment will arise only in the event that the DFL Caucus, during the 1981 session of the legislature, fails to provide for payment in full.

Yours very truly,



William E. Mullin
for

BASSFORD, HECKT, LOCKHART & MULLIN, P.A.

WEM/bae

cc: Mr. Larry Marofsky

He who knows not his
own genius has none
Blake.

hawaii

Irish sen
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gleomy in Gods
good air.

Eric H. Tracy

Jim Mc Iver

Jack Bonner

Minneapolis Tribune



Established 1867

Charles W. Bailey Editor
Wallace Allen Associate Editor
Frank Wright Managing Editor
Leonard Inskip Editorial Editor

Donald R. Dwight Publisher

10A .

Thursday, November 6, 1980



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Internal Revenue Service
1160 West 1200 South
Ogden, Utah 84201

In event of
MB's incapacity or death
all info to be turned
over to Larry Marofsky,
attorney.

POSTAGE AND FEES PAID
PENALTY FOR PRIVATE
USE \$300
DEPARTMENT
OF THE
TREASURY
554
OFFICIAL BUSINESS



7/82

MB Rummel

535-2122

LAS

BASSFORD, HECKT,
LOCKHART & MULLIN, P.A.
MINNEAPOLIS, MN 55402

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

10 FORM 9 ACT. 12

DELUXE - FORM TWG-3 V-378

CLIENT NO.	MATTER NO.	ATT. NO.	CLIENT	DESCRIPTIONS	ACCOUNT	AMOUNT
1 80-520	80-520	15	Return of advance			\$400.00
2						
3						
4						
5						

Deposit
6/22/81
MB

BASSFORD, HECKT, LOCKHART & MULLIN, P. A.

FORMERLY

RICHARDS, MONTGOMERY, COBB & BASSFORD, P. A.

LAWYERS

1520 PILLSBURY CENTER

MINNEAPOLIS, MINNESOTA 55402

(612) 333-3000

CHARLES A. BASSFORD
MELVIN D. HECKT
GREER E. LOCKHART
WILLIAM E. MULLIN
MACLAY R. HYDE
LYNN G. TRUESDELL
JEROME C. BRIGGS
L. H. MAY, JR.
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THOMAS H. RUTTEN

RICHARD L. LUTHER
OF COUNSEL

EDMUND T. MONTGOMERY
RETIRED

FRED B. SNYDER (1859-1951)
EDWARD C. GALE (1862-1943)
FRANK A. JAMES (1908-1959)
NATHAN A. COBB, SR. (1905-1976)
BERGMANN RICHARDS (1888-1978)

Marilyn J. Brummer
3525 The Mall
Minnetonka, Minnesota 55343


Dear Marilyn:

By way of a copy of this letter to Emily Ann, I am acknowledging in full the payment of this law firm's bill for work on Emily Ann's election contest.

I am transmitting herewith our firm's check in the amount of \$400.00 to the Staples Fact Fund pursuant to our understanding that this amount would be returned when payment in full was made for fees and expenses.

Marilyn, it was a great pleasure to work with Emily Ann and you on this matter. I made many good friends. I hope to work with you all in the future.

Very truly yours,


William E. Mullin

WEM:lb

cc: Emily Ann Staples
Larry Marofsky

MARK B. DAYTON

January 5, 1981

Staples FACT Fund
c/o Marilyn Brummer
3525 The Mall
Minnetonka, Minnesota 55343

Dear Marilyn:

I am pleased to enclose the contribution to assist Emily Anne in her legal battle. I hope that this will be of some help in carrying on the effort.

With best regards,

Sincerely,

Mark B. Dayton

MBD/jmt
Enclosure

1/15/81
\$100
MB.

DEPOSIT TICKET

SAVINGS ACCOUNT NO. _____ Date Jan 15 1981

FIRST FEDERAL SAVINGS AND LOAN ASSOCIATION OF MINNEAPOLIS

Name Staples Fact Fund
Address 3625 The Mall
MMK
(If Your Address Has Changed, Please Check Here [X])

	DOLLARS	CENTS
Currency		
Coin		
Bonds or Coupons		
Checks (list)		
Checks are subject to 10 working day clearing period		
<u>Selma Schwartz</u>	<u>5</u>	<u>00</u>
<u>MARK DAYTON</u>	<u>100</u>	<u>00</u>
SUB TOTAL	<u>105</u>	<u>00</u>
Less: Cash Returned		
Received by		
TOTAL DEPOSIT	<u>105</u>	<u>00</u>

FOR OFFICE USE ONLY

Check Hold Amount
If Other Than Total Deposit \$

Transfer from No. _____
FF1649

E. ROBERT SCHWARTZ, M.D.
SELMA H. SCHWARTZ
S-632-205-745-239 S-632-762-302-684
5201 OLSON HIGHWAY 612-545-9037
MINNEAPOLIS, MN. 55422

Jan 7 1981 1641

PAY TO THE ORDER OF Staples Fact Fund \$ 5.00
five 00/100 DOLLARS

CAMDEN NORTHWESTERN STATE BANK
Minneapolis, Minnesota 55412

FOR Legal Battle Selma Schwartz

MARK B. DAYTON
MINNEAPOLIS, MINNESOTA

January 5 1981 2862

PAY TO THE ORDER OF Staples FACT Fund \$ 100.00
One hundred and 00/100 DOLLARS

First Bank Minneapolis
Member First Bank System
First National Bank of Minneapolis
120 South Sixth Street, P.O. Box A512
Minneapolis, MN 55480

MEMO Mark Dayton



Senate Majority Research

ROOM 24G STATE CAPITOL ST. PAUL, MN. 55155
(612) 296-4949

ROOM 446 STATE OFFICE BUILDING ST. PAUL, MN. 55155
(612) 296-4113

Dave Karpinski, Director
296-4865

Denise Anderson
296-7425

Judy Berglund
296-4870

Greg Failor
296-0165

Rosemary Goff
296-0265

Marcia Greenfield
296-4866

Ray Joachim
296-7423

LaVerne Swanson
296-7422

November 11, 1980

Ramstad, Dir Sen. Research

MEMO

1973 (at least)

TO: Senator Staples

FROM: Dave Karpinski *Director, Senate Majority Res.*

- 1970-72 - Director since 1976.

RE: Comments on Charges in Ramstad Literature

What follows are a few comments on specific charges leveled in Ramstad's literature. I have addressed direct quotes and attempted to present the facts, as well as the votes Ramstad's statements may be based upon.

1. Charges related to indexing.

In the "Jim Ramstad Will Put Your Interests First" piece Ramstad says "THE DFL INCUMBENT STATE SENATOR VOTED AGAINST INFLATION-PROOFING YOUR STATE INCOME TAX."

This is a misleading half-truth, while you voted against three Republican amendments to index brackets at 100 percent (Jensen amendments--May 14, 1979, Journal Page 2249; March 11, 1978, Journal Page 4657; May 5, 1977, Journal Page 1925), you voted in favor of indexing state income tax rates at 85 percent the annual increases (from \$40 to \$60) and index dependent credits and to double and index the standard deduction (May 21, 1979-Journal Page 3364).

(Notably, the three Jensen amendments all failed on party lines votes).

This Ramstad charge appears intended to imply you opposed all indexing, by ignoring your votes in favor of 85 percent indexing, and increasing and indexing the standard deduction and dependent credits.

In other literature, Ramstad charges that you voted against 100 percent inflation-proofing the Minnesota state income tax. Those statements refer to the Jensen amendments, and he cites those votes. Here again, the accusation may be misleading by virtue of omission. However, the original charge quoted is by far the more serious misrepresentation of your record.

2. Charges related to legislative pensions.

Direct quotes from Ramstad literature include that Senator Staples voted "FOR GETTING HER PENSION AFTER ONLY SIX YEARS IN OFFICE." and "FOR GETTING YOUR OWN PENSION AFTER ONLY SIX YEARS IN OFFICE" (MOST OF US WORK 20 YEARS FOR OUR PENSIONS).

Clearly, Ramstad is implying that you will receive pension benefits after only six years in office. Just as clearly, the vote he cites (March 23, 1978-Journal Page 5953) does no such thing.

Under provisions of the bill cited, you will not receive a pension immediately after completing six years of service in the Minnesota Legislature. You will not receive any pension until reaching the age of 62, and only if reelected (March 23, 1978-Journal Page 5952). Furthermore, according to the Pension Reform Bill, a legislator now must reach the age of 62 before receiving a legislative pension. Previously, that age requirement was 60 years of age; saving taxpayers \$1.8 million in the current biennium alone.

In addition, prior to the new law, a legislator could potentially retire at a pension equal to 100% of his or her final monthly salary. Legislators will now retire at only 50% of their average monthly salaries, and this is possible only after 20 years of service. Again, this charge provides a great dollar savings to Minnesota taxpayers.

Ramstad also chose to ignore the fact that when pension vesting was considered separately from these other cost saving issues, you clearly established that you favored the previous eight-year vesting over six-year vesting. On May 7, 1979 (Journal Page 1564) you voted in favor of Senate File 326 which would have returned vesting to eight years. That bill passed the Senate 48-1, but died in the House.

It seems apparent, then, that Ramstad has not only misrepresented the impact of six-year vesting, but also your position on the vesting issue.

3. Charges related to general senior citizen tax relief.

Perhaps the most damaging and misleading charge leveled is in the "interest" piece, when Ramstad charges that "THE DFL INCUMBENT STATE SENATOR VOTED AGAINST TAX RELIEF FOR SENIORS AND OTHERS ON FIXED INCOMES". No cites are given, and the facts show you voted in favor of far more senior tax relief than you could possibly have opposed.

You voted in favor of increasing the dependent credit for seniors from \$80 to \$120, as well as to index those credits (May 21, 1979-Journal Page 3364); voted to dramatically expand the low-income tax credit program (March 23, 1978-Journal Page 5882; May 21, 1979-

Journal Page 3364; April 11, 1980-Journal Page 6682); voted in favor of property tax relief measures which saw seniors' relief go from providing \$836,000 in relief to 15,000 seniors in 1977, to the provision of 33.8 million dollars in relief to 156,000 seniors in 1980 (May 21, 1977-Journal Page 2875); March 23, 1978-Journal Page 5882; April 11, 1980-Journal Page 3364); Senator Staples has voted to increase the pension income exclusion from \$0 to \$11,000 for private pensions and from \$7,200 to \$11,000 for public pensioners (March 23, 1978-Journal Page 5882; May 21, 1979-Journal Page 3364; and April 11, 1980-Journal Page 6682); voted for inheritance tax reforms which eliminated taxes on more than 90% of Minnesota estates (May 21, 1979-Journal Page 3364).

4. Charges specifically related to pension tax relief.

X In the "Emily, How Could You?" piece and the "Land of 10,000 Taxes" piece, Ramstad charges that you voted "AGAINST PENSION TAX RELIEF FOR SENIOR CITIZENS." He cites votes against a Sieloff amendment (May 9, 1977) which would have restored a total exemption for public pensions (1977 Omnibus Tax Bill set that exemption at \$7,200) and your vote against a Sieloff amendment (May 14, 1979-Page 2117) which would have raised the pension exemption to \$12,000 and eliminated offsets for federal gross income over \$13,000.

Here again, while you opposed those two amendments, Ramstad is bending the facts to distort your record. He fails to point out, for example, that since you have been in office you have voted to raise the pension income exclusion for private pensioners from \$0 to \$11,000 (prior to 1978 private pensioners benefitted from no pension income exclusion).

? Ramstad also ignores the fact that you have voted, since 1978, to substantially increase the public pension income exclusion (from \$7,200 to \$11,000, with offset improvements). Those votes are March 23, 1978-Journal Page 5882; May 21, 1979-Journal Page 3364; April 11, 1980-Journal Page 6682.

Notably, while Ramstad cites your 1980 vote against an amendment to increase the pension income exclusion from \$10,000 to \$12,000, he ignores the fact that in that session you voted to increase the exclusion from \$10,000 to \$11,000.

Ramstad literature also charges that you voted "for taxing public employees' pensions." While you did voted for the 1977 Tax Bill eliminating the total public pension income exclusion, you also voted to increase the allowable exclusion each session since.

5. Charges related to renters' credits.

X Here again, Ramstad is distorting your record by claiming you voted "AGAINST INCREASING RENTERS' CREDITS", when actually the

question was not whether to increase those credits, but rather by how much.

Ramstad cites a vote against a Sieloff amendment increasing the portion of rent used to compute those credits from 20 percent to 25 percent (May 9, 1977-Journal Page 1927). He fails to point out that you did vote to increase the renters' credit from 20 to 22 percent (May 21, 1977-Journal Page 2875); and later to 23 percent (May 21, 1979-Journal Page 3364).

Clearly, attempting to paint you as against increased renters' credits is a distortion.

6. Charges related to voting against outlawing the showing of obscene movies at drive-ins.

You did vote against that bill (it passed 48-10) on May 21, 1979.

7. Charges related to gay rights.

Ramstad literature charges you voted "FOR A BILL THAT ALLOWS HOMOSEXUALS WHO OPENLY ADVOCATE THEIR WAY OF LIFE TO FORCE THEMSELVES ON ANY EMPLOYER OR LANDLORD."

Spur
On May 2, 1977 (Journal Page 1711) you voted in favor of a bill to prohibit discrimination on the basis of affectional preference in employment, housing, access to education and credit. The terminology "openly advocate their way of life" and "force themselves on any employer or landlord" have nothing to do with the measure and represent Ramstad's now inflammatory language.

8. Charges related to the sales tax on heating fuels.

Here again, a half-truth can be found in the charge you "VOTED AGAINST SALES TAX EXEMPTIONS FOR RESIDENTIAL HEATING FUELS."

X
Here, Ramstad cites your vote against a May 9, 1977 (Journal Page 1911) Sieloff amendment providing such an exemption, effective July 1, 1978. He fails to point out you voted for a residential heating fuels sales tax exemption (March 23, 1978-Journal Page 5882); and that exemption has been in effect since April 1, 1978. The exemption you supported actually went into effect before the one he criticizes you for opposing.

9. Charges related to tax exemption for military personnel.

X
Quotes from Ramstad literature include "THE DFL INCUMBENT STATE SENATOR VOTED AGAINST TAX EXEMPTIONS FOR MILITARY PERSONNEL," and that you voted "AGAINST TAX RELIEF FOR OUR MINNESOTA MEN AND WOMEN IN MILITARY SERVICE". Here again, half-truths, the votes cited by Ramstad are Republican amendments to the 1977 and 1978 Tax Bills (May 9, 1977, Sieloff amendment-Page 1930 and March 11, 1978-Page 4657, Ulland amendment). Each of those amendments would have re-

stored the military pay exemptions which were eliminated in the 1977 Omnibus Tax Bill, which you voted in favor of (May 21, 1977-Journal Page 2875).

Omnibus Tax Bill
You did vote to restore the exclusion of \$3,000 for in-state military pay and the next \$2,000 of military pay if earned outside the state (May 21, 1979-Journal Page 3364), and that exclusion is in effect.

10. Charges related to Barrette amendment on sentencing guidelines.

1978-d vote
1979-
Ramstad's campaign literature charges Senator Staples with being present and not voting on "THE BILL ALLOWING THOSE CONVICTED OF CRIMINAL SEXUAL MISCONDUCT (M.S. 609.343 (a)), BURGLARY (M.S. 609.58 Subd. 2(1) (b)) or KIDNAPPING (M.S. 609.25 Subd. 2(1)), TO GET BY WITHOUT ANY PRISON TERM." Ramstad cites the Barrette amendment to Senator Sikorski's Juvenile Justice Bill-H.F. 1896- as the basis for making the charge.

Summary
Ramstad's charge is misleading in many respects. First, the Barrette amendment would have delayed the implementation date of the Minnesota Sentencing Guidelines from May 1, 1980, to May 1, 1981. That is all the amendment did--nothing more. Senator Barrette had hoped that by delaying the implementation date, the Legislature would have an additional year to alter the sentencing guidelines submitted to it by the Minnesota Sentencing Guidelines Commission, which he thought were too lenient on certain types of offenders.

The amendment failed on a 22-36 party line vote and the IR party was quick to charge DFL legislators with being soft on crime.

The IR party's attack on the guidelines has been strewn with false and deceptive statements. A clear example is Ramstad's statement above on the guidelines.

The crimes cited by Ramstad--Criminal Sexual Conduct II - 609.343(a) Burglary - 609.58 Subd. 2(1)(b) and Kidnapping - 609.25 Subd. 2(1) are all severity VI offenses and the guidelines recommend imprisonment upon conviction for a severity level VI offense if the offender has a criminal history score of three points or more.

The criminal history score consists of four measures of prior criminality: (a) the number of prior felony convictions; (b) prior misdemeanor/gross misdemeanor record; (c) prior repetitive felony-type juvenile record; and (d) whether the offender was on probation or parole when an offense was committed. In fact, it is possible that an offender could have a criminal history score of three points resulting from his juvenile record, misdemeanor/gross misdemeanor record and custody status items at the time of his first felony conviction, and if he was convicted of a severity level VI offense, the guidelines would recommend imprisonment.

Another scenario which is possible under the guidelines follows:

Let us assume for the sake of argument that an offender had a criminal history score of zero at the time of his first conviction for a severity level six offense. A first time offender convicted of a severity level six offense would, under the guidelines, receive a stayed sentence of 21 months. As a condition of the stayed sentence, the judge could commit the offender to the county jail or workhouse for up to 12 months and set probation up to 20 years for some severity level six crimes. Should the offender violate a condition of the stayed sentence, the judge may revoke probation and commit the offender to prison for 21 months minus good time. Time spent in jail or the workhouse as a condition of a stayed sentence where the stay is later revoked cannot be used to reduce the sentence imposed.

Ramstad is apparently trying to deceive the voters who, exempt for criminal attorneys, do not work with the Criminal Code. For example, the crime of kidnapping he cites - 609.25 Subd. 2(1) - is kidnapping where the victim is released in a safe place without suffering great bodily harm. Kidnapping where the victim suffers great bodily harm - 609.25 Subd. 2(2) is a severity level VIII offense and the guidelines recommend imprisonment in all cases. Kidnapping where the victim is not released in a safe place - 609.25 Subd. 2(2) - is a severity level VII offense and the guidelines also recommend imprisonment in all cases. ^{contact} In addition, the the criminal sexual conduct crime he cites - 609.343 (a) - covers non-forcible, consenting sexual contact when the victim is less than 13 years of age and the offender is more than 36 months older than the victim. Criminal sexual conduct also covers the crimes of forcible sexual penetration (rape) and forcible sexual ~~conduct~~ ^{contact}. The guidelines recommend imprisonment in all cases of forcible sexual penetration and forcible sexual ~~conduct~~ ^{contact}.

BW
I should also point out that there is a mandatory imprisonment sentence of at least three years under 609.346, Subd. 1, for a person convicted of criminal sexual conduct in any degree within 15 years of a prior criminal sexual conduct conviction.

Finally, the guidelines are merely recommendations to the court judges who may depart from the guidelines and impose any penalty authorized by the criminal code if the case involves substantial and compelling aggravating or mitigating factors.

11. Charges related to legislative pay

X
Legislative pay may be thought of as having two components - salary and per diem. In 1977, the annual salary for legislators was increased from \$8,400 to \$16,500 for 1979, and \$18,500 for 1980 and thereafter. However, session per diem was cut for the 1979 and 1980 sessions from \$48 to \$27 for rural legislators, and from \$44 to \$17 for urban and suburban legislators who do not change

Memo to Senator Staples
November 11, 1980
Page Seven

their place of lodging.

The net effect of the salary and per diem change is shown below:

	<u>Annual Salary</u>	<u>Per Diem</u>	<u>Total Compensation</u>
1977	\$ 8,400	\$5,891	\$14,291
1978	8,400	3,928	12,328
1979	16,500	3,529	20,029
1980	18,500	1,934 (thru 9/30/80)	20,434

Source: Mary Thompson, Senate Fiscal Services Aide

AFTER TX

Times I pointed out corrections to my record.
Once

BASSFORD, HECKT, LOCKHART & MULLIN, P. A.

FORMERLY

RICHARDS, MONTGOMERY, COBB & BASSFORD, P. A.

LAWYERS

1520 PILLSBURY CENTER

MINNEAPOLIS, MINNESOTA 55402

(612) 333-3000

CHARLES A. BASSFORD
MELVIN D. HECKT
GREER E. LOCKHART
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RICHARD L. LUTHER
OF COUNSEL

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RETIRED

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EDWARD C. GALE (1862-1943)
FRANK A. JAMES (1908-1959)
NATHAN A. COBB, SR. (1905-1976)
BERGMANN RICHARDS (1888-1978)

November 29, 1980

Senator Marvin B. Hanson
Rural Route #1
Hallock, Minnesota 56728

Senator Neil B. Dieterich
113 Grain Exchange Building
Minneapolis, MN 55415

Senator Robert J. Tennessen
2522 Thomas Avenue South
Minneapolis, MN 55405

Senator Jack Davies
875 Summit Avenue
St. Paul, MN 55105

Dear Senators Hanson, Dieterich, Tennessen and Davies:

Enclosed for each of you is a copy of Mr. Ramstad's Answer in Senator Staples' election contest. Note that Mr. Ramstad has challenged the constitutionality of Minnesota Statutes 210A.04. We will attempt to persuade the Judge that, no matter how the Court rules on the constitutional question, the Court should make findings as to whether Mr. Ramstad's statements were false.

Yours truly,

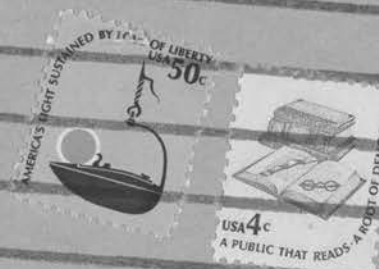
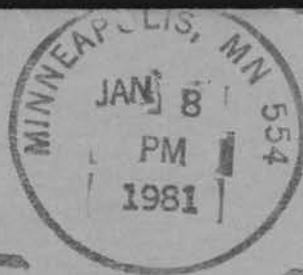
William E. Mullin
for
BASSFORD, HECKT, LOCKHART & MULLIN, P.A.

WEM/bae
Enclosure

cc: Mr. Larry Marofsky
cc: Senator Staples

P.S. Emily and Larry: Also enclosed are copies of the Notice of Contest, Interrogatories, and Notice of Depositions which we served, and the Interrogatories and Notice of Deposition which they served. These give you a complete file.

WEM



FROM:

BASSFORD, HECKT, LOCKHART & MULLIN, P. A.

1520 PILLSBURY CENTER

MINNEAPOLIS, MINNESOTA 55402

For To: The Voters of State Senate
District 43
c/o Ms. Emily Anne Staples
1640 Xanthus Lane
Wayzata, Minnesota 55391

LAW OFFICES OF
LAWRENCE P. MAROFSKY

5901 BROOKLYN BLVD., SUITE 200
MINNEAPOLIS, MINN. 55429

TELEPHONE 535-2122
AREA CODE: 612

February 27, 1984

Ms. Emily Anne Staples
1640 Xanthus Lane North
Plymouth, MN 55441

Dear Emily:

Enclosed please find a check in the amount of \$1,044.29 pursuant to your request as a partial repayment of the loan of \$1,500.00 made to the Staples Campaign Committee. I have closed the Staples Campaign account. The balance of this constitutes a campaign contribution in the year that the contribution was originally made. The balance is yours and of course there is no interest on this because this is obviously less than your original principal.

Yours always,



Larry

BASSFORD, HECKT, LOCKHART & MULLIN, P. A.

FORMERLY

RICHARDS, MONTGOMERY, COBB & BASSFORD, P. A.

LAWYERS

1520 PILLSBURY CENTER

MINNEAPOLIS, MINNESOTA 55402

(612) 333-3000

RICHARD L. LUTHER
OF COUNSEL

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BERGMANN RICHARDS (1888-1978)

January 8, 1981

Ms. Emily Anne Staples
1640 Xanthus Lane
Wayzata, Minnesota 55391

Re: Our File Number 80-520

Dear Emily:


Enclosed is our statement for services rendered in this matter. I am also enclosing a copy of Larry Marofsky's statement.

Four Hundred Dollars of the amount shown to be due to this law firm has been paid by the Staples' Fact Fund. Upon the payment of our bill, it is my intention to reimburse the Staples' Fact Fund.

I would appreciate your promptly making application to the appropriate officials of the Minnesota State Senate for payment of our bill and Mr. Marofsky's bill.

I am sending a copy of this letter, and of the enclosed bills, to Senator Marvin Hanson.

Yours very truly,


William E. Mullin
for

BASSFORD, HECKT, LOCKHART & MULLIN, P.A.

WEM/rj

cc: Larry Marofsky, Esq.
Senator Marvin Hanson

BASSFORD, HECKT, LOCKHART & MULLIN, P. A.

FORMERLY

RICHARDS, MONTGOMERY, COBB & BASSFORD, P. A.

LAWYERS

1520 PILLSBURY CENTER

MINNEAPOLIS, MINNESOTA 55402

(612) 333-3000

January 8, 1981

CHARLES A. BASSFORD
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BERGMANN RICHARDS (1888-1978)

To: The Voters of State Senate
District 43
c/o Ms. Emily Anne Staples
1640 Xanthus Lane
Wayzata, Minnesota 55391

Re: Our File Number 80-520

FOR PROFESSIONAL SERVICES RENDERED
from November 7, 1980 through
January 6, 1981, as follows:

<u>Date</u>	<u>Attorney</u>	<u>Services Rendered</u>
11/07/80	Lundberg	Intra-office conference; legal research.
11/07/80	Mullin	Meetings with Senator Staples and Larry Marofsky; legal research and telephone conferences.
11/08/80	Mullin	Legal research; meeting with Senator Staples; telephone conference with Senator Hanson.
11/10/80	Mullin	Intra-office conference and conference with Larry Marofsky.
11/10/80	Lundberg	Legal research.
11/10/80	Mullin	Travel to St. Paul for meeting with Senators, client and Larry Marofsky; draft Notice of Contest.
11/19/80	Mullin	Telephone conferences with client, Larry Marofsky, M. J. O'Keefe; preparation of Notice of Contest; legal research.
11/20/80	Mullin	Draft Notice of Contest, Notice of Taking Depositions and interrogatories; meeting with client, Larry Marofsky and John Murphy.

Ms. Emily Anne Staples
January 8, 1981
Page Two

11/20/80	Rutten	Meeting with client, Larry Marofsky, John Murphy; legal research; preparation of documents for filing; correspondence; arrange for service.
11/21/80	Rutten	Preparation of papers for service and filing; arrange filing; service on County Auditor; filing with District Court; intra-office conference.
11/21/80	Mullin	Prepare Notice of Contest; deposition notices and interrogatories; telephone conference with client.
11/22/80	Mullin	Telephone conference with John Murphy regarding status of investigation.
11/24/80	Mullin	Telephone conference with Senator Tennesen; telephone conference with Larry Marofsky; telephone conference with Larry Marofsky; telephone conference with Mr. Ramstad's office; meeting with M. J. O'Keefe.
11/25/80	Rutten	Prepare subpoenas for deponents.
11/25/80	Mullin	Telephone conference with William Flashkamp; telephone conference with Larry Marofsky; letter to William Flashkamp; telephone conference with M. J. O'Keefe; telephone conference with Attorney General's office; telephone conference with Mark Andrews; telephone conference with John Murphy.
11/26/80	Rutten	Prepare subpoenas and arrange for service.

Ms. Emily Anne Staples
January 8, 1981
Page Three

11/26/80	Mullin	Telephone conference with Senate Research; telephone conference and meeting with John Murphy; telephone conference with Senate Research.
11/26/80	Mullin	Telephone conference with State Supreme Court, Office of Chief Justice. Telephone conference with Senator Sikorski; telephone conference with Dave Karpinski; telephone conference with John Murphy; telephone conference with Dave Karpinski; telephone conferences with Senate Research; telephone conferences with Senator Davies and Larry Marofsky; telephone conference with State Supreme Court, Office of Chief Justice.
11/28/80	Lockhart	Intra-office conference.
11/28/80	Bulinski	Legal research; review pleadings.
11/28/80	Mullin	Meeting with David Karpinski and Larry Marofsky; telephone conferences with Flashkamp; intra-office conference.
11/29/80	Bulinski	Legal research.
11/29/80	Mullin	Preparation of trial brief; telephone conference with Patrick Flahaven, Secretary of the Senate; letter to Senator Keefe; letter to Mr. Flahaven; telephone conference with Larry Marofsky.
12/01/80	Mullin	Telephone conferences with Senator Staples and Larry Marofsky; telephone conference with Bill Flashkamp's office; meeting with Larry Marofsky, and meeting with Bill Flashkamp.

Ms. Emily Anne Staples
January 8, 1981
Page Four

12/01/80	Rutten	Intra-office conference; telephone conference with Metro Legal regarding service of subpoena.
12/01/80	Bulinski	Legal research.
12/02/80	Lockhart	Intra-office conference.
12/02/80	Mullin	Telephone conference with Judge Mullally's office; letter to State Supreme Court, Office of Chief Justice; conference with Bill Flashkamp's office; telephone conference with Larry Marofsky; letter to Judge Mullally, and meeting with John Murphy; telephone conference with Larry Marofsky; intra-office conference.
12/02/80	Bulinski	Telephone conference with informant; preparation of Answers to Interrogatories.
12/03/80	Mullin	Telephone conference with Judge Mullally; correspondence; telephone conferences with Bill Flashkamp; intra-office conference regarding Answers to Interrogatories.
12/03/80	Bulinski	Preparation of Answers to Interrogatories; legal research.
12/03/80	Mullin	Telephone conference with Senator Staples; telephone conference with Judge Mullally; telephone conference with Bill Flashkamp; intra-office conference regarding Answers to Interrogatories; telephone conference with Bill Flashkamp; deposition of James Ramsted.
12/04/80	Mullin	Telephone conference with client; office conference, and telephone conference with Senator Steve Keefe.

Ms. Emily Anne Staples
January 8, 1981
Page Five

12/04/80	Bulinski	Letter to Jan Smaby; letters to Ramsey County District Court; telephone conference with Larry Marofsky.
12/05/80	Mullin	Telephone conference with Judge Mullally; telephone conference with Bill Flashkamp's office; meeting with Senator Hanson; telephone call to Judge Mullally's office; intra-office conference.
12/05/80	Bulinski	Legal research; intra-office conference; obtain subpoenas for deponents; telephone conference with Keith Carlson and Tom Triplett; revise Answers to Interrogatories; telephone conference with Larry Marofsky; legal research.
12/06/80	Mullin	Meeting with client; deposition of Senator Staples; meeting with client, Tom Triplett and Keith Carlson; intra-office conference regarding same.
12/06/80	Bulinski	Intra-office conference; telephone conference with Dave Newhall.
12/08/80	Mullin	Intra-office conference regarding handling; telephone conference with Bruce Willis; telephone conference with Larry Marofsky; meeting with Jan Smaby; prepare trial brief.
12/08/80	Bulinski	Telephone conference with Larry Marofsky; intra-office conference; telephone conference with David Orenstein; telephone conference with Secretary of State's office; telephone conference with Elections Division; telephone conference with Violet Rawn; legal research.

Ms. Emily Anne Staples
January 8, 1981
Page Six

12/09/80	Mullin	Prepare trial brief; intra-office conference; telephone conferences with opposing attorney; telephone conference with Judge Mullally.
12/09/80	Bulinski	Intra-office conference; legal research; prepare trial brief.
12/10/80	Rutten	Obtain subpoena; arrange for service of same.
12/10/80	Mullin	Prepare trial brief; meeting with Larry Marofsky; depositions of Hoyt and Weinstock; deposition of Senator Staples; conference regarding trial brief.
12/10/80	Bulinski	Legal research.
12/11/80	Mullin	Preparation for hearing and hearing before Judge Mullally; intra-office conference; telephone conference with Whitehead; review trial brief; attend deposition.
12/11/80	Rutten	Investigation; telephone potential witnesses; legal research regarding gifts to voters.
12/11/80	Bulinski	Preparation of copies and items for pre-trial conference; affidavit; Request for Admissions; review deposition transcripts; attend meetings; obtain research; prepare work on trial brief.
12/12/80	Carstens	Obtain subpoenas.
12/12/80	Mullin	Meeting with Tom Triplett; intra-office conference regarding handling; telephone conference with Bruce Willis; deposition of Tom Triplett; meeting with Keith Carlson; deposition of Steehn; intra-office conferences; depositions of Bach, Murphy; review trial brief.

Ms. Emily Anne Staples
January 8, 1981
Page Seven

12/12/80	Bulinski	Telephone conferences with Mary Thompson, Jan Smaby, Patrick Flahaven and Bruce Willis; prepare trial brief; draft letter to Jan Smaby.
12/12/80	Rutten	Contact witnesses; legal research regarding Minnesota Statutes §210A; intra-office conference.
12/13/80	Mullin	Review trial brief; intra-office conference; depositions of Keith Carlson, Marofsky, and Morris; meeting with client.
12/13/80	Rutten	Preparation of trial brief; intra-office conference.
12/13/80	Bulinski	Legal research; telephone conference with Jan Smaby; telephone conference with Keith Carlson; telephone conference with Senator Hanson; intra-office conference; review and revise trial brief.
12/14/80	Mullin	Preparation for trial; telephone conferences with Senator Staples, Larry Marofsky and Willis; telephone conferences with Staples, Willis, Carlson, Triplett and Marofsky.
12/15/80	Carstens	Pick up documents at State Capitol.
12/15/80	Mullin	Preparation for deposition; telephone conference with Judge Minenko; depositions of Jan Smaby and Barrette; meeting with client; intra-office conference; deposition of Keefe; meeting with client; intra-office conference regarding depositions; travel to St. Paul; deposition of Seiloff; review depositions.
12/15/80	Rutten	Legal research regarding Minnesota Election law.

Ms. Emily Anne Staples
January 8, 1981
Page Eight

12/15/80	Bulinski	Revisions of trial brief; telephone witnesses regarding new trial times; telephone conferences with Pat Flahaven, Jan Smaby.
12/16/80	Mullin	Pre-trial conference and trial.
12/16/80	Carstens	Meet with affiants in New Hope and Edina; obtain Affidavits and deliver to to the courthouse.
12/16/80	Bulinski	Production of documents necessary for trial; telephone conference to witnesses; telephone conferences regarding legal process; legal research; Attorney General opinions; travel to St. Paul.
12/17/80	Lundberg	Legal research.
12/17/80	Bulinski	Read trial briefs and proposed findings in <u>Carpenter v. Petty</u> ; attend trial; arrange witnesses; legal research on exceptions to hearsay rule.
12/17/80	Mullin	Preparation for trial and trial; meeting with client; meeting with Keith Carlson and Senator Hanson.
12/17/80	Rutten	Arrange for service of subpoena on Teachers Retirement Association.
12/18/80	Carstens	Delivery of evidence for trial to Ramsey County Courthouse.
12/18/80	Bulinski	Attend breakfast meeting; legal research regarding hearsay rule; telephone conferences regarding witnesses at trial; trial; telephone conferences regarding subpoenas, intra-office conference.
12/18/80	Mullin	Attend breakfast meeting with Larry Marofsky; trial.
12/18/80	Rutten	Arrange service of subpoena; telephone conference with Minneapolis Teachers Retirement Association.

Ms. Emily Anne Staples
January 8, 1981
Page Nine

12/19/80	Mullin	Conference with messenger; intra-office conference; telephone conference with State of Minnesota Senate office; intra-office conference regarding handling; meeting with Keith Carlson.
12/19/80	Carstens	Delivery of documents to St. Paul Courthouse.
12/19/80	Mullin	Telephone conference with David Newhall; telephone conference with Senate Majority staff.
12/19/80	Bulinski	Legal research; reproduction of documents.
12/20/80	Bulinski	Begin preparation of supplemental trial brief, Findings of Fact and Conclusions of Law.
12/20/80	Mullin	Telephone conferences with Keith Carlson; preparation of supplemental trial brief.
12/22/80	Bulinski	Attend trial; revise supplemental trial brief; telephone conference with Newhall and Orenstein; begin preparation of Findings of Fact, Conclusions of Law.
12/22/80	Mullin	Preparation for trial, trial; meeting with client.
12/24/80	Moos	West Law Research regarding nationwide election day campaigning statutes and case law.
12/26/80	Bulinski	Further legal research regarding election day campaigning; telephone conference with Larry Marofsky; telephone conference with Bruce Willis; intra-office conference regarding trial brief; preparation of Findings.
12/26/80	Mullin	Preparation of trial brief in support of findings.

Ms. Emily Anne Staples
January 8, 1980
Page Ten

12/26/80	Mullin	Preparation of trial brief in support of Findings.
12/27/80	Mullin	Preparation of brief in support of findings of fact; meeting with Larry Marofsky.
12/27/80	Bulinski	Intra-office conference; review trial brief; review and revise Findings.
12/29/80	Bulinski	Telephone conference with Jan Smaby; preparation of trial brief; preparation of Findings; review and revise trial brief.
12/29/80	Mullin	Preparation of brief; telephone conference with Keith Carlson.
12/29/80	Lundberg	Review and revise brief; intra-office conference.
12/30/80	Mullin	Intra-office conference; review and revise brief.
12/30/80	Bulinski	Review and revise proposed Findings; draft letters; read Findings of Attorney Bruce Willis.
12/31/80	Bulinski	Draft letter to Judge Mullally; intra-office conference.
12/31/80	Mullin	Meeting.
1/2/81	Mullin	Telephone conference with David Newhall; telephone conferences with Larry Marofsky; intra-office conference.
1/2/81	Bulinski	Hand deliver letter to Judge Mullally in his St. Paul chambers.

Ms. Emily Anne Staples
January 8, 1981
Page Eleven

1/06/81 Mullin Telephone conference with Senator
Hanson; telephone conferences
with Messrs. Willis and Marofsky.

418.25 Attorney Hours at \$80.00 per hour:	\$ 33,460.00
12.25 Law Clerk Hours at \$30.00 per hour:	367.50
	<u>\$ 33,827.50</u>

Expenses

Xerox charges	\$ 335.95	
Postage	4.85	
Parking and mileage	114.91	
Overtime Secretarial services	211.51	
Witness fees	162.00	
Meeting expense	22.60	
Sheriff's service	7.60	
Court filing fees	27.00	
West Law	106.60	
John R. Murphy & Associates, Inc. (Investigation)	686.20	
Metro Legal Services, Inc. (Service of Process)	296.05	
William L. Belkengren Court Reporter	354.15	
George Manke - Court Reporter	335.00	
Ray J. Lerschen & Associates - Court Reporter	322.25	
Virginia Ledford Court Reporter	381.70	
Kirby A. Kennedy & Associates - Court Reporter	427.75	
Martie Forde - Court Reporter	261.60	
Courier Dispatch	<u>6.78</u>	
		<u>4,064.50</u>
TOTAL AMOUNT DUE:		\$ 37,892.00
		=====

WEM/rj

TUZINSKI & MAROFSKY

5930 BROOKLYN BLVD.
MINNEAPOLIS, MINNESOTA 55429
PHONE (612) - 566-4411

STATEMENT DATE	ACCOUNT NO.	PAGE
12/23/80		1
STATEMENT		

TO: EMILY STAPLES
1640 XANTHUS LANE
PLYMOUTH, MN.

55447

FOR PROPER CREDIT PLEASE RETURN THIS PORTION WITH YOUR PAYMENT

INVOICE DATE	DESCRIPTION			BALANCES
12/01/80	CONF W/MULLIN RE JUDGES & SELECTION OF JUDGES			187.50
12/02/80	REVIEW & ANSWER INTERGATORIES			112.50
12/03/80	ATTEND DEPOSITION OF RAMSTAD			300.00
12/06/80	DEPOSITION EMILY STAPLES			243.75
12/06/80	CONF - TRIPLETT ETC			131.25
12/10/80	DEPOSITION HOYT & PREP.			300.00
12/10/80	PREPARATION OF DEP OF M MAROFSKY			225.00
12/10/80	DEPOSITION OF STAPLES			112.50
12/10/80	CURRENT	30 - 60 DAYS	DEPOSITION OF WEINSTOCK	TOTAL DUE
12/11/80			CONF W/JUDGE	150.00
12/11/80			DEPOSITION OF C HVASS JR	225.00
12/12/80	TUZINSKI & MAROFSKY, 5930 BROOKLYN BLVD., MINNEAPOLIS, MINNESOTA 55429 • PHONE (612) 566-4411			150.00
12/12/80	FINANCE CHARGE 1% PER MONTH AFTER 60 DAYS			165.00
12/13/80	DEPOSITION KEITH CARLSON			120.00
12/15/80	DEPOSITION WILLIAM MORRIS			75.00
12/15/80	DEPOSITION BARRETTE			75.00
12/15/80	DEPOSITION JAN SMABY			75.00
12/15/80	DEPOSITION SIELOF			262.50
12/16/80	TRIAL			637.50
12/16/80	COST ADVANCE			24.27
12/17/80	TRIAL			68.75
12/17/80	COST ADVANCE			11.41
12/18/80	TRIAL			50.00
12/18/80	COST ADVANCE			61.04
12/22/80	Trial			262.50
12/23/80	Review findings			157.50
12/26/80	Conf. - G. Bulinski			37.50
12/27/80	Review 1st draft Brief			150.00
12/28/80	Review 2nd draft Brief			131.25

FOR PROPER CREDIT PLEASE RETURN THIS PORTION WITH YOUR PAYMENT

INVOICE DATE	D E S C R I P T I O N				BALANCES
11/10/80	PREVIOUS BALANCE Conf w/Senate and Bill Mullin Re Election				375.00
11/21/80	REVIEW PLEADINGS				165.00
11/21/80	REDRAFT PLEADINGS				75.00
11/21/80	REVIEW & DRAFT DISCOVERY				210.00
11/25/80	CONFERENCE W/GONZALAS				22.50
11/26/80	REVIEW PLEADING				75.00
11/26/80	ROUGH DRAFT QUESTIONS				
	CONF RE J				250.00
CURRENT					TOTAL DUE
7186.72					7186.72

TUZINSKI & MAROFSKY, 5930 BROOKLYN BLVD., MINNEAPOLIS, MINNESOTA 55429 • PHONE (612) 566-4411
FINANCE CHARGE 1% PER MONTH AFTER 60 DAYS

BASSFORD, HECKT, LOCKHART & MULLIN, P. A.

FORMERLY

RICHARDS, MONTGOMERY, COBB & BASSFORD, P. A.

LAWYERS

1520 PILLSBURY CENTER

MINNEAPOLIS, MINNESOTA 55402

(612) 333-3000

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GREGORY P. BULINSKI
THOMAS H. RUTTEN

RICHARD L. LUTHER
OF COUNSEL

EDMUND T. MONTGOMERY
RETIRED

FRED B. SNYDER (1859-1951)
EDWARD C. GALE (1862-1943)
FRANK A. JAMES (1908-1959)
NATHAN A. COBB, SR. (1905-1976)
BERGMANN RICHARDS (1888-1978)

November 29, 1980

Ms. Emily Ann Staples
1640 Zanthus
Plymouth, Minnesota 55447

Dear Emily Ann:

The purpose of this letter is to clarify our agreement concerning legal fees. Our agreement contemplates prompt payment of fees when billed. However, a bill will not be submitted until the DFL Caucus is ready to act on payment of this bill. Your obligation to make payment will arise only in the event that the DFL Caucus, during the 1981 session of the legislature, fails to provide for payment in full.

Yours very truly,



William E. Mullin
for

BASSFORD, HECKT, LOCKHART & MULLIN, P.A.

WEM/bae

cc: Mr. Larry Marofsky

He who knows not his
own genius has none
Blake.

Irish men
assidua being
gloomy in good
good air.

Ernest Tracy

Jim McIver

Jack Bonner

hawaii



Senate Majority Research

ROOM 24G STATE CAPITOL ST. PAUL, MN. 55155
(612) 296-4949

ROOM 446 STATE OFFICE BUILDING ST. PAUL, MN. 55155
(612) 296-4113

Dave Karpinski, Director
296-4865

Denise Anderson
296-7425

Judy Berglund
296-4870

Greg Failor
296-0165

Rosemary Goff
296-0265

Marcia Greenfield
296-4866

Ray Joachim
296-7423

LaVerne Swanson
296-7422

November 11, 1980

Remermon, Dir Sen. Research

MEMO

1973 (at least)

TO: Senator Staples

FROM: Dave Karpinski *Director, Senate majority Res.*
- 1970-72 - Director since 1976.

RE: Comments on Charges in Ramstad Literature

What follows are a few comments on specific charges leveled in Ramstad's literature. I have addressed direct quotes and attempted to present the facts, as well as the votes Ramstad's statements may be based upon.

1. Charges related to indexing.

In the "Jim Ramstad Will Put Your Interests First" piece Ramstad says "THE DFL INCUMBENT STATE SENATOR VOTED AGAINST INFLATION-PROOFING YOUR STATE INCOME TAX."

This is a misleading half-truth, while you voted against three Republican amendments to index brackets at 100 percent (Jensen amendments--May 14, 1979, Journal Page 2249; March 11, 1978, Journal Page 4657; May 5, 1977, Journal Page 1925), you voted in favor of indexing state income tax rates at 85 percent the annual increases (from \$40 to \$60) and index dependent credits and to double and index the standard deduction (May 21, 1979-Journal Page 3364).

(Notably, the three Jensen amendments all failed on party lines votes).

This Ramstad charge appears intended to imply you opposed all indexing, by ignoring your votes in favor of 85 percent indexing, and increasing and indexing the standard deduction and dependent credits.

In other literature, Ramstad charges that you voted against 100 percent inflation-proofing the Minnesota state income tax. Those statements refer to the Jensen amendments, and he cites those votes. Here again, the accusation may be misleading by virtue of omission. However, the original charge quoted is by far the more serious misrepresentation of your record.

2. Charges related to legislative pensions.

Direct quotes from Ramstad literature include that Senator Staples voted "FOR GETTING HER PENSION AFTER ONLY SIX YEARS IN OFFICE." and "FOR GETTING YOUR OWN PENSION AFTER ONLY SIX YEARS IN OFFICE" (MOST OF US WORK 20 YEARS FOR OUR PENSIONS).

Clearly, Ramstad is implying that you will receive pension benefits after only six years in office. Just as clearly, the vote he cites (March 23, 1978-Journal Page 5953) does no such thing.

Under provisions of the bill cited, you will not receive a pension immediately after completing six years of service in the Minnesota Legislature. You will not receive any pension until reaching the age of 62, and only if reelected (March 23, 1978-Journal Page 5952). Furthermore, according to the Pension Reform Bill, a legislator now must reach the age of 62 before receiving a legislative pension. Previously, that age requirement was 60 years of age; saving taxpayers \$1.8 million in the current biennium alone.

In addition, prior to the new law, a legislator could potentially retire at a pension equal to 100% of his or her final monthly salary. Legislators will now retire at only 50% of their average monthly salaries, and this is possible only after 20 years of service. Again, this charge provides a great dollar savings to Minnesota taxpayers.

Ramstad also chose to ignore the fact that when pension vesting was considered separately from these other cost saving issues, you clearly established that you favored the previous eight-year vesting over six-year vesting. On May 7, 1979 (Journal Page 1564) you voted in favor of Senate File 326 which would have returned vesting to eight years. That bill passed the Senate 48-1, but died in the House.

It seems apparent, then, that Ramstad has not only misrepresented the impact of six-year vesting, but also your position on the vesting issue.

3. Charges related to general senior citizen tax relief.

Perhaps the most damaging and misleading charge leveled is in the "interest" piece, when Ramstad charges that "THE DFL INCUMBENT STATE SENATOR VOTED AGAINST TAX RELIEF FOR SENIORS AND OTHERS ON FIXED INCOMES". No cites are given, and the facts show you voted in favor of far more senior tax relief than you could possibly have opposed.

You voted in favor of increasing the dependent credit for seniors from \$80 to \$120, as well as to index those credits (May 21, 1979-Journal Page 3364); voted to dramatically expand the low-income tax credit program (March 23, 1978-Journal Page 5882; May 21, 1979-

Journal Page 3364; April 11, 1980-Journal Page 6682); voted in favor of property tax relief measures which saw seniors' relief go from providing \$836,000 in relief to 15,000 seniors in 1977, to the provision of 33.8 million dollars in relief to 156,000 seniors in 1980 (May 21, 1977-Journal Page 2875); March 23, 1978-Journal Page 5882; April 11, 1980-Journal Page 3364); Senator Staples has voted to increase the pension income exclusion from \$0 to \$11,000 for private pensioners and from \$7,200 to \$11,000 for public pensioners (March 23, 1978-Journal Page 5882; May 21, 1979-Journal Page 3364; and April 11, 1980-Journal Page 6682); voted for inheritance tax reforms which eliminated taxes on more than 90% of Minnesota estates (May 21, 1979-Journal Page 3364).

4. Charges specifically related to pension tax relief.

X In the "Emily, How Could You?" piece and the "Land of 10,000 Taxes" piece, Ramstad charges that you voted "AGAINST PENSION TAX RELIEF FOR SENIOR CITIZENS." He cites votes against a Sieloff amendment (May 9, 1977) which would have restored a total exemption for public pensions (1977 Omnibus Tax Bill set that exemption at \$7,200) and your vote against a Sieloff amendment (May 14, 1979-Page 2117) which would have raised the pension exemption to \$12,000 and eliminated offsets for federal gross income over \$13,000.

Here again, while you opposed those two amendments, Ramstad is bending the facts to distort your record. He fails to point out, for example, that since you have been in office you have voted to raise the pension income exclusion for private pensioners from \$0 to \$11,000 (prior to 1978 private pensioners benefitted from no pension income exclusion).

? Ramstad also ignores the fact that you have voted, since 1978, to substantially increase the public pension income exclusion (from \$7,200 to \$11,000, with offset improvements). Those votes are March 23, 1978-Journal Page 5882; May 21, 1979-Journal Page 3364; April 11, 1980-Journal Page 6682.

Notably, while Ramstad cites your 1980 vote against an amendment to increase the pension income exclusion from \$10,000 to \$12,000, he ignores the fact that in that session you voted to increase the exclusion from \$10,000 to \$11,000.

Ramstad literature also charges that you voted "for taxing public employees' pensions." While you did voted for the 1977 Tax Bill eliminating the total public pension income exclusion, you also voted to increase the allowable exclusion each session since.

5. Charges related to renters' credits.

X Here again, Ramstad is distorting your record by claiming you voted "AGAINST INCREASING RENTERS' CREDITS", when actually the

question was not whether to increase those credits, but rather by how much.

Ramstad cites a vote against a Sieloff amendment increasing the portion of rent used to compute those credits from 20 percent to 25 percent (May 9, 1977-Journal Page 1927). He fails to point out that you did vote to increase the renters' credit from 20 to 22 percent (May 21, 1977-Journal Page 2875); and later to 23 percent (May 21, 1979-Journal Page 3364).

Clearly, attempting to paint you as against increased renters' credits is a distortion.

6. Charges related to voting against outlawing the showing of obscene movies at drive-ins.

You did vote against that bill (it passed 48-10) on May 21, 1979.

7. Charges related to gay rights.

Ramstad literature charges you voted "FOR A BILL THAT ALLOWS HOMOSEXUALS WHO OPENLY ADVOCATE THEIR WAY OF LIFE TO FORCE THEMSELVES ON ANY EMPLOYER OR LANDLORD."

SPUR
On May 2, 1977 (Journal Page 1711) you voted in favor of a bill to prohibit discrimination on the basis of affectional preference in employment, housing, access to education and credit. The terminology "openly advocate their way of life" and "force themselves on any employer or landlord" have nothing to do with the measure and represent Ramstad's now inflammatory language.

8. Charges related to the sales tax on heating fuels.

Here again, a half-truth can be found in the charge you "VOTED AGAINST SALES TAX EXEMPTIONS FOR RESIDENTIAL HEATING FUELS."

X
Here, Ramstad cites your vote against a May 9, 1977 (Journal Page 1911) Sieloff amendment providing such an exemption, effective July 1, 1978. He fails to point out you voted for a residential heating fuels sales tax exemption (March 23, 1978-Journal Page 5882); and that exemption has been in effect since April 1, 1978. The exemption you supported actually went into effect before the one he criticizes you for opposing.

9. Charges related to tax exemption for military personnel.

X
Quotes from Ramstad literature include "THE DFL INCUMBENT STATE SENATOR VOTED AGAINST TAX EXEMPTIONS FOR MILITARY PERSONNEL," and that you voted "AGAINST TAX RELIEF FOR OUR MINNESOTA MEN AND WOMEN IN MILITARY SERVICE". Here again, half-truths, the votes cited by Ramstad are Republican amendments to the 1977 and 1978 Tax Bills (May 9, 1977, Sieloff amendment-Page 1930 and March 11, 1978-Page 4657, Ulland amendment). Each of those amendments would have re-

stored the military pay exemptions which were eliminated in the 1977 Omnibus Tax Bill, which you voted in favor of (May 21, 1977-Journal Page 2875).

Omnibus Tax Bill
You did vote to restore the exclusion of \$3,000 for in-state military pay and the next \$2,000 of military pay if earned outside the state (May 21, 1979-Journal Page 3364), and that exclusion is in effect.

10. Charges related to Barrette amendment on sentencing guidelines.

1978-d vote
1979-
Ramstad's campaign literature charges Senator Staples with being present and not voting on "THE BILL ALLOWING THOSE CONVICTED OF CRIMINAL SEXUAL MISCONDUCT (M.S. 609.343 (a)), BURGLARY (M.S. 609.58 Subd. 2(1) (b)) or KIDNAPPING (M.S. 609.25 Subd. 2(1)), TO GET BY WITHOUT ANY PRISON TERM." Ramstad cites the Barrette amendment to Senator Sikorski's Juvenile Justice Bill-H.F. 1896-as the basis for making the charge.

Snubby
Ramstad's charge is misleading in many respects. First, the Barrette amendment would have delayed the implementation date of the Minnesota Sentencing Guidelines from May 1, 1980, to May 1, 1981. That is all the amendment did--nothing more. Senator Barrette had hoped that by delaying the implementation date, the Legislature would have an additional year to alter the sentencing guidelines submitted to it by the Minnesota Sentencing Guidelines Commission, which he thought were too lenient on certain types of offenders.

The amendment failed on a 22-36 party line vote and the IR party was quick to charge DFL legislators with being soft on crime.

The IR party's attack on the guidelines has been strewn with false and deceptive statements. A clear example is Ramstad's statement above on the guidelines.

The crimes cited by Ramstad--Criminal Sexual Conduct II - 609.343(a) Burglary - 609.58 Subd. 2(1)(b) and Kidnapping - 609.25 Subd. 2(1) are all severity ^{level} VI offenses and the guidelines recommend imprisonment upon conviction for a severity level VI offense if the offender has a criminal history score of three points or more.

The criminal history score consists of four measures of prior criminality: (a) the number of prior felony convictions; (b) prior misdemeanor/gross misdemeanor record; (c) prior repetitive felony-type juvenile record; and (d) whether the offender was on probation or parole when an offense was committed. In fact, it is possible that an offender could have a criminal history score of three points resulting from his juvenile record, misdemeanor/gross misdemeanor record and custody status items at the time of his first felony conviction, and if he was convicted of a severity level VI offense, the guidelines would recommend imprisonment.

Another scenario which is possible under the guidelines follows:

Let us assume for the sake of argument that an offender had a criminal history score of zero at the time of his first conviction for a severity level six offense. A first time offender convicted of a severity level six offense would, under the guidelines, receive a stayed sentence of 21 months. As a condition of the stayed sentence, the judge could commit the offender to the county jail or workhouse for up to 12 months and set probation up to 20 years for some severity level six crimes. Should the offender violate a condition of the stayed sentence, the judge may revoke probation and commit the offender to prison for 21 months minus good time. Time spent in jail or the workhouse as a condition of a stayed sentence where the stay is later revoked cannot be used to reduce the sentence imposed.

Ramstad is apparently trying to deceive the voters who, exempt for criminal attorneys, do not work with the Criminal Code. For example, the crime of kidnapping he cites - 609.25 Subd. 2(1) - is kidnapping where the victim is released in a safe place without suffering great bodily harm. Kidnapping where the victim suffers great bodily harm - 609.25 Subd. 2(2) is a severity level VIII offense and the guidelines recommend imprisonment in all cases. Kidnapping where the victim is not released in a safe place - 609.25 Subd. 2(2) - is a severity level VII offense and the guidelines also recommend imprisonment in all cases. In addition, the the criminal sexual conduct crime he cites - 609.343 (a) - covers non-forcible, consenting sexual contact when the victim is less than 13 years of age and the offender is more than 36 months older than the victim. Criminal sexual conduct also covers the crimes of forcible sexual penetration (rape) and forcible sexual ~~conduct~~ ^{contact}. The guidelines recommend imprisonment in all cases of forcible sexual penetration and forcible sexual ~~conduct~~ ^{contact}.

BW I should also point out that there is a mandatory imprisonment sentence of at least three years under 609.346, Subd. 1, for a person convicted of criminal sexual conduct in any degree within 15 years of a prior criminal sexual conduct conviction.

Finally, the guidelines are merely recommendations to the court judges who may depart from the guidelines and impose any penalty authorized by the criminal code if the case involves substantial and compelling aggravating or mitigating factors.

11. Charges related to legislative pay

X Legislative pay may be thought of as having two components - salary and per diem. In 1977, the annual salary for legislators was increased from \$8,400 to \$16,500 for 1979, and \$18,500 for 1980 and thereafter. However, session per diem was cut for the 1979 and 1980 sessions from \$48 to \$27 for rural legislators, and from \$44 to \$17 for urban and suburban legislators who do not change

Memo to Senator Staples
November 11, 1980
Page Seven

their place of lodging.

The net effect of the salary and per diem change is shown below:

	<u>Annual Salary</u>	<u>Per Diem</u>	<u>Total Compensation</u>
1977	\$ 8,400	\$5,891	\$14,291
1978	8,400	3,928	12,328
1979	16,500	3,529	20,029
1980	18,500	1,934 (thru 9/30/80)	20,434

Source: Mary Thompson, Senate Fiscal Services Aide

AFTER TX

Times I pointed out corrections to my record.
Once

BASSFORD, HECKT, LOCKHART & MULLIN, P. A.

FORMERLY

RICHARDS, MONTGOMERY, COBB & BASSFORD, P. A.

LAWYERS

1520 PILLSBURY CENTER

MINNEAPOLIS, MINNESOTA 55402

(612) 333-3000

CHARLES A. BASSFORD
MELVIN D. HECKT
GREER E. LOCKHART
WILLIAM E. MULLIN
MACLAY R. HYDE
LYNN G. TRUESDELL
JEROME C. BRIGGS
L. H. MAY, JR.
JOHN M. DEGNAN
KEVIN P. KEENAN
REBECCA L. MOOS
JOHN M. ANDERSON
CHARLES E. LUNDBERG
GREGORY P. BULINSKI
THOMAS H. RUTTEN

RICHARD L. LUTHER
OF COUNSEL
EDMUND T. MONTGOMERY
RETIRED

FRED B. SNYDER (1859-1951)
EDWARD C. GALE (1862-1943)
FRANK A. JAMES (1908-1959)
NATHAN A. COBB, SR. (1905-1976)
BERGMANN RICHARDS (1888-1978)

November 29, 1980

Senator Marvin B. Hanson
Rural Route #1
Hallock, Minnesota 56728

Senator Neil B. Dieterich
113 Grain Exchange Building
Minneapolis, MN 55415

Senator Robert J. Tennesen
2522 Thomas Avenue South
Minneapolis, MN 55405

Senator Jack Davies
875 Summit Avenue
St. Paul, MN 55105

Dear Senators Hanson, Dieterich, Tennesen and Davies:

Enclosed for each of you is a copy of Mr. Ramstad's Answer in Senator Staples' election contest. Note that Mr. Ramstad has challenged the constitutionality of Minnesota Statutes 210A.04. We will attempt to persuade the Judge that, no matter how the Court rules on the constitutional question, the Court should make findings as to whether Mr. Ramstad's statements were false.

Yours truly,

William E. Mullin
for
BASSFORD, HECKT, LOCKHART & MULLIN, P.A.

WEM/bae
Enclosure

cc: Mr. Larry Marofsky
✓ cc: Senator Staples

P.S. Emily and Larry: Also enclosed are copies of the Notice of Contest, Interrogatories, and Notice of Depositions which we served, and the Interrogatories and Notice of Deposition which they served. These give you a complete file.

WEM

LAW OFFICES OF
LAWRENCE P. MAROFSKY

5901 BROOKLYN BLVD., SUITE 200
MINNEAPOLIS, MINN. 55429

TELEPHONE 535-2122
AREA CODE: 612

February 27, 1984

Ms. Emily Anne Staples
1640 Xanthus Lane North
Plymouth, MN 55441

Dear Emily:

Enclosed please find a check in the amount of \$1,044.29 pursuant to your request as a partial repayment of the loan of \$1,500.00 made to the Staples Campaign Committee. I have closed the Staples Campaign account. The balance of this constitutes a campaign contribution in the year that the contribution was originally made. The balance is yours and of course there is no interest on this because this is obviously less than your original principal.

Yours always,



Larry

BASSFORD, HECKT, LOCKHART & MULLIN, P. A.

FORMERLY

RICHARDS, MONTGOMERY, COBB & BASSFORD, P. A.

LAWYERS

1520 PILLSBURY CENTER

MINNEAPOLIS, MINNESOTA 55402

(612) 333-3000

January 8, 1981

CHARLES A. BASSFORD
MELVIN D. HECKT
GREER E. LOCKHART
WILLIAM E. MULLIN
MACLAY R. HYDE
LYNN G. TRUESDELL
JEROME C. BRIGGS
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NATHAN A. COBB, SR. (1905-1976)
BERGMANN RICHARDS (1888-1978)

Ms. Emily Anne Staples
1640 Xanthus Lane
Wayzata, Minnesota 55391

Re: Our File Number 80-520

Dear Emily:


Enclosed is our statement for services rendered in this matter.
I am also enclosing a copy of Larry Marofsky's statement.

Four Hundred Dollars of the amount shown to be due to this law
firm has been paid by the Staples' Fact Fund. Upon the payment of
our bill, it is my intention to reimburse the Staples' Fact Fund.

I would appreciate your promptly making application to the
appropriate officials of the Minnesota State Senate for payment of
our bill and Mr. Marofsky's bill.

I am sending a copy of this letter, and of the enclosed bills,
to Senator Marvin Hanson.

Yours very truly,


William E. Mullin
for

BASSFORD, HECKT, LOCKHART & MULLIN, P.A.

WEM/rj

cc: Larry Marofsky, Esq.
Senator Marvin Hanson

BASSFORD, HECKT, LOCKHART & MULLIN, P. A.

FORMERLY

RICHARDS, MONTGOMERY, COBB & BASSFORD, P. A.

LAWYERS

1520 PILLSBURY CENTER

MINNEAPOLIS, MINNESOTA 55402

(612) 333-3000

January 8, 1981

CHARLES A. BASSFORD
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BERGMANN RICHARDS (1888-1978)

To: The Voters of State Senate
District 43
c/o Ms. Emily Anne Staples
1640 Xanthus Lane
Wayzata, Minnesota 55391

Re: Our File Number 80-520

FOR PROFESSIONAL SERVICES RENDERED
from November 7, 1980 through
January 6, 1981, as follows:

<u>Date</u>	<u>Attorney</u>	<u>Services Rendered</u>
11/07/80	Lundberg	Intra-office conference; legal research.
11/07/80	Mullin	Meetings with Senator Staples and Larry Marofsky; legal research and telephone conferences.
11/08/80	Mullin	Legal research; meeting with Senator Staples; telephone conference with Senator Hanson.
11/10/80	Mullin	Intra-office conference and conference with Larry Marofsky.
11/10/80	Lundberg	Legal research.
11/10/80	Mullin	Travel to St. Paul for meeting with Senators, client and Larry Marofsky; draft Notice of Contest.
11/19/80	Mullin	Telephone conferences with client, Larry Marofsky, M. J. O'Keefe; preparation of Notice of Contest; legal research.
11/20/80	Mullin	Draft Notice of Contest, Notice of Taking Depositions and interrogatories; meeting with client, Larry Marofsky and John Murphy.

Ms. Emily Anne Staples
January 8, 1981
Page Two

11/20/80	Rutten	Meeting with client, Larry Marofsky, John Murphy; legal research; preparation of documents for filing; correspondence; arrange for service.
11/21/80	Rutten	Preparation of papers for service and filing; arrange filing; service on County Auditor; filing with District Court; intra-office conference.
11/21/80	Mullin	Prepare Notice of Contest; deposition notices and interrogatories; telephone conference with client.
11/22/80	Mullin	Telephone conference with John Murphy regarding status of investigation.
11/24/80	Mullin	Telephone conference with Senator Tennessen; telephone conference with Larry Marofsky; telephone conference with Larry Marofsky; telephone conference with Mr. Ramstad's office; meeting with M. J. O'Keefe.
11/25/80	Rutten	Prepare subpoenas for deponents.
11/25/80	Mullin	Telephone conference with William Flashkamp; telephone conference with Larry Marofsky; letter to William Flashkamp; telephone conference with M. J. O'Keefe; telephone conference with Attorney General's office; telephone conference with Mark Andrews; telephone conference with John Murphy.
11/26/80	Rutten	Prepare subpoenas and arrange for service.

Ms. Emily Anne Staples
January 8, 1981
Page Three

11/26/80	Mullin	Telephone conference with Senate Research; telephone conference and meeting with John Murphy; telephone conference with Senate Research.
11/26/80	Mullin	Telephone conference with State Supreme Court, Office of Chief Justice. Telephone conference with Senator Sikorski; telephone conference with Dave Karpinski; telephone conference with John Murphy; telephone conference with Dave Karpinski; telephone conferences with Senate Research; telephone conferences with Senator Davies and Larry Marofsky; telephone conference with State Supreme Court, Office of Chief Justice.
11/28/80	Lockhart	Intra-office conference.
11/28/80	Bulinski	Legal research; review pleadings.
11/28/80	Mullin	Meeting with David Karpinski and Larry Marofsky; telephone conferences with Flashkamp; intra-office conference.
11/29/80	Bulinski	Legal research.
11/29/80	Mullin	Preparation of trial brief; telephone conference with Patrick Flahaven, Secretary of the Senate; letter to Senator Keefe; letter to Mr. Flahaven; telephone conference with Larry Marofsky.
12/01/80	Mullin	Telephone conferences with Senator Staples and Larry Marofsky; telephone conference with Bill Flashkamp's office; meeting with Larry Marofsky, and meeting with Bill Flashkamp.

Ms. Emily Anne Staples
January 8, 1981
Page Four

12/01/80	Rutten	Intra-office conference; telephone conference with Metro Legal regarding service of subpoena.
12/01/80	Bulinski	Legal research.
12/02/80	Lockhart	Intra-office conference.
12/02/80	Mullin	Telephone conference with Judge Mullally's office; letter to State Supreme Court, Office of Chief Justice; conference with Bill Flashkamp's office; telephone conference with Larry Marofsky; letter to Judge Mullally, and meeting with John Murphy; telephone conference with Larry Marofsky; intra-office conference.
12/02/80	Bulinski	Telephone conference with informant; preparation of Answers to Interrogatories.
12/03/80	Mullin	Telephone conference with Judge Mullally; correspondence; telephone conferences with Bill Flashkamp; intra-office conference regarding Answers to Interrogatories.
12/03/80	Bulinski	Preparation of Answers to Interrogatories; legal research.
12/03/80	Mullin	Telephone conference with Senator Staples; telephone conference with Judge Mullally; telephone conference with Bill Flashkamp; intra-office conference regarding Answers to Interrogatories; telephone conference with Bill Flashkamp; deposition of James Ramsted.
12/04/80	Mullin	Telephone conference with client; office conference, and telephone conference with Senator Steve Keefe.

Ms. Emily Anne Staples
January 8, 1981
Page Five

12/04/80	Bulinski	Letter to Jan Smaby; letters to Ramsey County District Court; telephone conference with Larry Marofsky.
12/05/80	Mullin	Telephone conference with Judge Mullally; telephone conference with Bill Flashkamp's office; meeting with Senator Hanson; telephone call to Judge Mullally's office; intra-office conference.
12/05/80	Bulinski	Legal research; intra-office conference; obtain subpoenas for deponents; telephone conference with Keith Carlson and Tom Triplett; revise Answers to Interrogatories; telephone conference with Larry Marofsky; legal research.
12/06/80	Mullin	Meeting with client; deposition of Senator Staples; meeting with client, Tom Triplett and Keith Carlson; intra-office conference regarding same.
12/06/80	Bulinski	Intra-office conference; telephone conference with Dave Newhall.
12/08/80	Mullin	Intra-office conference regarding handling; telephone conference with Bruce Willis; telephone conference with Larry Marofsky; meeting with Jan Smaby; prepare trial brief.
12/08/80	Bulinski	Telephone conference with Larry Marofsky; intra-office conference; telephone conference with David Orenstein; telephone conference with Secretary of State's office; telephone conference with Elections Division; telephone conference with Violet Rawn; legal research.

Ms. Emily Anne Staples
January 8, 1981
Page Six

12/09/80	Mullin	Prepare trial brief; intra-office conference; telephone conferences with opposing attorney; telephone conference with Judge Mullally.
12/09/80	Bulinski	Intra-office conference; legal research; prepare trial brief.
12/10/80	Rutten	Obtain subpoena; arrange for service of same.
12/10/80	Mullin	Prepare trial brief; meeting with Larry Marofsky; depositions of Hoyt and Weinstock; deposition of Senator Staples; conference regarding trial brief.
12/10/80	Bulinski	Legal research.
12/11/80	Mullin	Preparation for hearing and hearing before Judge Mullally; intra-office conference; telephone conference with Whitehead; review trial brief; attend deposition.
12/11/80	Rutten	Investigation; telephone potential witnesses; legal research regarding gifts to voters.
12/11/80	Bulinski	Preparation of copies and items for pre-trial conference; affidavit; Request for Admissions; review deposition transcripts; attend meetings; obtain research; prepare work on trial brief.
12/12/80	Carstens	Obtain subpoenas.
12/12/80	Mullin	Meeting with Tom Triplett; intra-office conference regarding handling; telephone conference with Bruce Willis; deposition of Tom Triplett; meeting with Keith Carlson; deposition of Steehn; intra-office conferences; depositions of Bach, Murphy; review trial brief.

Ms. Emily Anne Staples
January 8, 1981
Page Seven

12/12/80	Bulinski	Telephone conferences with Mary Thompson, Jan Smaby, Patrick Flahaven and Bruce Willis; prepare trial brief; draft letter to Jan Smaby.
12/12/80	Rutten	Contact witnesses; legal research regarding Minnesota Statutes §210A; intra-office conference.
12/13/80	Mullin	Review trial brief; intra-office conference; depositions of Keith Carlson, Marofsky, and Morris; meeting with client.
12/13/80	Rutten	Preparation of trial brief; intra-office conference.
12/13/80	Bulinski	Legal research; telephone conference with Jan Smaby; telephone conference with Keith Carlson; telephone conference with Senator Hanson; intra-office conference; review and revise trial brief.
12/14/80	Mullin	Preparation for trial; telephone conferences with Senator Staples, Larry Marofsky and Willis; telephone conferences with Staples, Willis, Carlson, Triplett and Marofsky.
12/15/80	Carstens	Pick up documents at State Capitol.
12/15/80	Mullin	Preparation for deposition; telephone conference with Judge Minenko; depositions of Jan Smaby and Barrette; meeting with client; intra-office conference; deposition of Keefe; meeting with client; intra-office conference regarding depositions; travel to St. Paul; deposition of Seiloff; review depositions.
12/15/80	Rutten	Legal research regarding Minnesota Election law.

Ms. Emily Anne Staples
January 8, 1981
Page Eight

12/15/80	Bulinski	Revisions of trial brief; telephone witnesses regarding new trial times; telephone conferences with Pat Flahaven, Jan Smaby.
12/16/80	Mullin	Pre-trial conference and trial.
12/16/80	Carstens	Meet with affiants in New Hope and Edina; obtain Affidavits and deliver to to the courthouse.
12/16/80	Bulinski	Production of documents necessary for trial; telephone conference to witnesses; telephone conferences regarding legal process; legal research; Attorney General opinions; travel to St. Paul.
12/17/80	Lundberg	Legal research.
12/17/80	Bulinski	Read trial briefs and proposed findings in <u>Carpenter v. Petty</u> ; attend trial; arrange witnesses; legal research on exceptions to hearsay rule.
12/17/80	Mullin	Preparation for trial and trial; meeting with client; meeting with Keith Carlson and Senator Hanson.
12/17/80	Rutten	Arrange for service of subpoena on Teachers Retirement Association.
12/18/80	Carstens	Delivery of evidence for trial to Ramsey County Courthouse.
12/18/80	Bulinski	Attend breakfast meeting; legal research regarding hearsay rule; telephone conferences regarding witnesses at trial; trial; telephone conferences regarding subpoenas, intra-office conference.
12/18/80	Mullin	Attend breakfast meeting with Larry Marofsky; trial.
12/18/80	Rutten	Arrange service of subpoena; telephone conference with Minneapolis Teachers Retirement Association.

Ms. Emily Anne Staples
January 8, 1981
Page Nine

12/19/80	Mullin	Conference with messenger; intra-office conference; telephone conference with State of Minnesota Senate office; intra-office conference regarding handling; meeting with Keith Carlson.
12/19/80	Carstens	Delivery of documents to St. Paul Courthouse.
12/19/80	Mullin	Telephone conference with David Newhall; telephone conference with Senate Majority staff.
12/19/80	Bulinski	Legal research; reproduction of documents.
12/20/80	Bulinski	Begin preparation of supplemental trial brief, Findings of Fact and Conclusions of Law.
12/20/80	Mullin	Telephone conferences with Keith Carlson; preparation of supplemental trial brief.
12/22/80	Bulinski	Attend trial; revise supplemental trial brief; telephone conference with Newhall and Orenstein; begin preparation of Findings of Fact, Conclusions of Law.
12/22/80	Mullin	Preparation for trial, trial; meeting with client.
12/24/80	Moos	West Law Research regarding nationwide election day campaigning statutes and case law.
12/26/80	Bulinski	Further legal research regarding election day campaigning; telephone conference with Larry Marofsky; telephone conference with Bruce Willis; intra-office conference regarding trial brief; preparation of Findings.
12/26/80	Mullin	Preparation of trial brief in support of findings.

Ms. Emily Anne Staples
January 8, 1980
Page Ten

12/26/80	Mullin	Preparation of trial brief in support of Findings.
12/27/80	Mullin	Preparation of brief in support of findings of fact; meeting with Larry Marofsky.
12/27/80	Bulinski	Intra-office conference; review trial brief; review and revise Findings.
12/29/80	Bulinski	Telephone conference with Jan Smaby; preparation of trial brief; preparation of Findings; review and revise trial brief.
12/29/80	Mullin	Preparation of brief; telephone conference with Keith Carlson.
12/29/80	Lundberg	Review and revise brief; intra-office conference.
12/30/80	Mullin	Intra-office conference; review and revise brief.
12/30/80	Bulinski	Review and revise proposed Findings; draft letters; read Findings of Attorney Bruce Willis.
12/31/80	Bulinski	Draft letter to Judge Mullally; intra-office conference.
12/31/80	Mullin	Meeting.
1/2/81	Mullin	Telephone conference with David Newhall; telephone conferences with Larry Marofsky; intra-office conference.
1/2/81	Bulinski	Hand deliver letter to Judge Mullally in his St. Paul chambers.

Ms. Emily Anne Staples
January 8, 1981
Page Eleven

1/06/81 Mullin Telephone conference with Senator
 Hanson; telephone conferences
 with Messrs. Willis and Marofsky.

418.25 Attorney Hours at \$80.00 per hour:	\$ 33,460.00
12.25 Law Clerk Hours at \$30.00 per hour:	367.50
	<u>\$ 33,827.50</u>

Expenses

Xerox charges	\$ 335.95	
Postage	4.85	
Parking and mileage	114.91	
Overtime Secretarial services	211.51	
Witness fees	162.00	
Meeting expense	22.60	
Sheriff's service	7.60	
Court filing fees	27.00	
West Law	106.60	
John R. Murphy & Associates, Inc. (Investigation)	686.20	
Metro Legal Services, Inc. (Service of Process)	296.05	
William L. Belkengren Court Reporter	354.15	
George Manke - Court Reporter	335.00	
Ray J. Lerschen & Associates - Court Reporter	322.25	
Virginia Ledford Court Reporter	381.70	
Kirby A. Kennedy & Associates - Court Reporter	427.75	
Martie Forde - Court Reporter	261.60	
Courier Dispatch	<u>6.78</u>	
		<u>4,064.50</u>

TOTAL AMOUNT DUE:	\$ 37,892.00
	=====

WEM/rj

TUZINSKI & MAROFSKY

5930 BROOKLYN BLVD.
MINNEAPOLIS, MINNESOTA 55429
PHONE (612) - 566-4411

STATEMENT DATE	ACCOUNT NO.	PAGE
12/23/80		1
STATEMENT		

TO: EMILY STAPLES
1640 XANTHUS LANE
PLYMOUTH, MN.

55447

FOR PROPER CREDIT PLEASE RETURN THIS PORTION WITH YOUR PAYMENT

INVOICE DATE	D E S C R I P T I O N		BALANCES
12/01/80	CONF W/MULLIN RE JUDGES & SELECTION OF JUDGES		187.50
12/02/80	REVIEW & ANSWER INTERGATORIES		112.50
12/03/80	ATTEND DEPOSITION OF RAMSTAD		300.00
12/06/80	DEPOSITION EMILY STAPLES		243.75
12/06/80	CONF - TRIPLETT ETC		131.25
12/10/80	DEPOSITION HOYT & PREP.		300.00
12/10/80	PREPARATION OF DEP OF M MAROFSKY		225.00
12/10/80	DEPOSITION OF STAPLES		112.50
12/10/80	30 - 60 DAYS	DEPOSITION OF WEINSTOCK	TOTAL DUE
12/11/80		CONF W/JUDGE	150.00
12/11/80		DEPOSITION OF C HVASS JR	225.00
12/12/80	TUZINSKI & MAROFSKY, 5930 BROOKLYN BLVD., MINNEAPOLIS, MINNESOTA 55429 • PHONE (612) 566-4411		150.00
12/12/80	FINANCE CHARGE 1% PER MONTH AFTER 60 DAYS		165.00
12/13/80	DEPOSITION KEITH CARLSON		120.00
12/15/80	DEPOSITION WILLIAM MORRIS		75.00
12/15/80	DEPOSITION BARRETTE		75.00
12/15/80	DEPOSITION JAN SMABY		75.00
12/15/80	DEPOSITION SIELOF		262.50
12/16/80	TRIAL		637.50
12/16/80	COST ADVANCE		24.27
12/17/80	TRIAL		68.75
12/17/80	COST ADVANCE		11.41
12/18/80	TRIAL		50.00
12/18/80	COST ADVANCE		61.04
12/22/80	Trial		262.50
12/23/80	Review findings		157.50
12/26/80	Conf. C. Bulinski		37.50
12/27/80	Review 1st draft Brief		150.00
12/28/80	Review 2nd draft Brief		131.25

FOR PROPER CREDIT PLEASE RETURN THIS PORTION WITH YOUR PAYMENT

INVOICE DATE	D E S C R I P T I O N		BALANCES
11/10/80	Conf w/Senate and Bill Mullin re Election		375.00
11/21/80	REVIEW PLEADINGS		165.00
11/21/80	REDRAFT PLEADINGS		75.00
11/21/80	REVIEW & DRAFT DISCOVERY		210.00
11/25/80	CONFERENCE W/GONZALAS		22.50
11/26/80	REVIEW PLEADING		75.00
11/26/80	ROUGH DRAFT QUESTIONS		250.00
11/26/80	CONF RE J		
CURRENT	30 - 60 DAYS	60 - 90 DAYS	OVER 90 DAYS
7186.72			TOTAL DUE
			7186.72

TUZINSKI & MAROFSKY, 5930 BROOKLYN BLVD., MINNEAPOLIS, MINNESOTA 55429 • PHONE (612) 566-4411
FINANCE CHARGE 1% PER MONTH AFTER 60 DAYS