



FEDERAL ELECTION COMMISSION

1125 K STREET NW  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1227

Date Filmed 4/22/81 Camera No. --- 2

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PS Form 3811, Jan. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

*MUR 1237 M. White*

● SENDER: Complete items 1, 2, and 3.  
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)  
☐ Show to whom and date delivered.....  
☐ Show to whom, date and address of delivery.....  
☐ RESTRICTED DELIVERY  
Show to whom and date delivered.....  
☐ RESTRICTED DELIVERY.  
Show to whom, date, and address of delivery. \$.....  
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
*Edward Keboak, III*  
*Suite 344, Morrison Bldg.*  
*815 2nd Street*  
*Charlottesville, Va.*

3. ARTICLE DESCRIPTION:  
REGISTERED NO. CERTIFIED NO. INSURED NO.  
*044646*

(Always obtain signature of addressee or agent)

I have received the article described above.  
SIGNATURE ☐ Addressee ☐ Authorized agent  
*Fayetta Bowyer*

4. DATE OF DELIVERY  
*3-23-81*

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

*3-18-81*

POSTMARK  
*1981*





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 18, 1981

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Edward Rebrook, III  
Suite 344, Morrison Building  
815 Quarrier Street  
Charleston, West Virginia 25301

Re: MUR 1227

Dear Mr. Rebrook:

On August 4, 1980, the Commission found reason to believe that your client, the West Virginia State Democratic Executive Committee ("WVSDEC"), violated 2 U.S.C. §§ 433 and 434, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days.

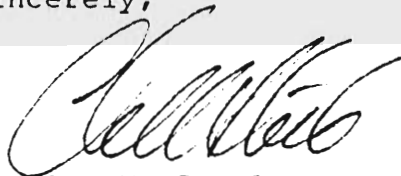
The Commission reminds you, for your future activity, that the payment of "get-out-the-vote" expenses by the WVSDEC may qualify the WVSDEC as a political committee under the Act (see 2 U.S.C. § 431(4)(A)). During a federal election year, "get-out-the-vote" expenses should be allocated on a reasonable basis between federal and non-federal activity even though the activity is not conducted expressly on behalf of federal candidates. See Advisory Opinions 1978-50 and 1978-102 (copies enclosed). Please note that certain types

Letter to Edward Rebrook, III  
Page 2

of get-out-the-vote expenses are exempted from the definition of "contribution" and "expenditure" under the Act and, thus, need not be included in the allocation formula. See 2 U.S.C. § 431(8)(A)(v), (x), and (xii) and 2 U.S.C. § 431(9)(B)(iv), (viii), and (ix). The portion of funds attributable to federal activity, however, must be paid from funds lawfully contributed under the Act. See 11 C.F.R. § 102.5 (b).

If you have any questions please contact Maura White, the staff member assigned to this matter, at 202/523-4060.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Steele", written in a cursive style.

Charles N. Steele  
General Counsel

Enclosures

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Edward Rebrook, III  
Suite 344, Morrison Building  
815 Quarrier Street  
Charleston, West Virginia 25301

Re: MUR 1227

Dear Mr. Rebrook:

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The Commission reminds you, for your future activity, that the payment of "get-out-the-vote" expenses by the WVSEEC may qualify the WVSEEC as a political committee under the Act (see 2 U.S.C. § 431(4)(A)). During a federal election year, "get-out-the-vote" expenses should be allocated on a reasonable basis between federal and non-federal activity even though the activity is not conducted expressly on behalf of federal candidates. See Advisory Opinions 1978-50 and 1978-102 (copies enclosed). Please note that certain types

Letter to Edward Debrock, III  
Page 2

of get-out-the-vote expenses are exempted from the definition of "contribution" and "expenditure" under the Act and, thus, need not be included in the allocation formula. See 2 U.S.C. § 431(8)(A)(v), (x), and (xii) and 2 U.S.C. § 431(9)(1)(iv), (viii), and (ix). The portion of funds attributable to federal activity, however, must be paid from funds lawfully contributed under the Act. See 11 C.F.R. § 102.5(b).

If you have any questions please contact Maura White, the staff member assigned to this matter, at 202/523-4060.

Sincerely,

MW  
3/18/81

Charles H. Steele  
General Counsel

Enclosures

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ST  
KG

MW 2/19/81



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

September 19, 1978

AO 1978-50

Morley A. Winograd  
Chairperson  
Michigan Democratic Party  
Hart-Kennedy House  
606 Townsend  
Lansing, Michigan 48933

Dear Mr. Winograd:

This responds to your letter of July 13, 1978, requesting an advisory opinion concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act") to a proposed get-out-the-vote campaign of the Michigan Democratic Party to increase support for the Democratic Gubernatorial nominee of the party.

Your letter explains that in connection with the 1978 general election the Michigan Democratic Party:

"intends to conduct an extensive educational and motivational campaign designed to increase support for our Democratic Gubernatorial nominee and turn-out those voters who are supporting that candidate. This campaign will involve telephone calls, mailings, literature distributions and personal visits by campaign workers to persons who are likely to be supporting the Democratic Gubernatorial nominee."

You further explain that the Party's project will "not involve contacting or communicating with voters based upon their support any of the Democratic nominees for Federal office." However, the 1978 general election in Michigan will include one seat in the United States Senate and 19 Congressional offices. Your letter

also states that party expenditures on behalf of candidates for Federal office and contributions received for Federal campaign purposes will be reported by the Party's Federal campaign committee-- Democratic Campaign Committee (Michigan). These expenditures, you say, "will not be related to our voter contact or voter turnout program which will be restricted solely to the Democratic Gubernatorial campaign."

You pose three questions for which you request an opinion:

- (1) Are expenditures of the Michigan Democratic Party for the purpose of identifying and motivating supporters of the Party's Gubernatorial nominee covered by the Act?
- (2) If these expenditures are subject to the Act, may the Party continue to maintain two separate accounts for the purpose of reporting contributions and expenditures of the Party under both Federal and State law? If this is permissible, how may it be accomplished?
- (3) If some portion or all of the described expenditures are subject to the Act, on what basis, if any, should they be allocated to the Party's special expenditure limits on behalf of Senatorial and Congressional candidates under 2 U.S.C. §441a(d)(3)?

In response to your first question, the Commission concludes that expenditures of the Party for the purpose of identifying and motivating persons to support the Party's Gubernatorial nominee are, in part, for the additional purpose of influencing the election of persons to Federal office. In Advisory Opinion 1978-10, the Commission recently held that a political party's voter registration and get-out-the vote activity in a Federal election year, even though not expressly on behalf of candidates for Federal office, was nevertheless for the purpose of influencing the persons contacted to vote for all candidates of the political party.



The Commission therefore required that party expenditures for its get-out-the-vote campaign be allocated on a reasonable basis between the two classes of candidates who would appear on the same election ballot - those seeking Federal office and those seeking other elective public offices. The expenditures for get-out-the-vote drives would not, however, need to be allocated as expenditures on behalf of specific candidates for Federal office if the drive is not conducted on behalf of clearly identified candidates for Federal office to whom the expenditure can be directly attributed. See Commission regulations at 11 CFR 106.1(c)(2). For example, if the purpose of the drive is to advocate the election of one or more clearly identified candidates for Federal office, then the cost must be attributed to that candidate or candidates, for limitation and reporting purposes, as either a contribution or an expenditure. 2 U.S.C. §441a(a) and §441a(d)(3). However, the Party may use printed materials in its get-out-the-vote drive which identify candidates for Federal office without allocating any cost to particular Federal candidates, if those materials are within the slate card or sample ballot exemption. 2 U.S.C. §431(e)(5)(E) and §431(f)(4)(C).<sup>\*</sup> See Advisory Opinion 1978-9 (question 7).

In response to question (2), the Democratic Party of Michigan may continue to maintain its registered Federal campaign committee -- Democratic Campaign Committee (Michigan) -- for purposes of reporting contributions and expenditures coming within the purview of the Act and Commission regulations. See 11 CFR 102.6. The reporting political committee of the Party is required to defray the allocable Federal election portion of the expenses incurred by the Party for the described get-out-the-vote campaign. These expenditures are considered administrative expenses of the Party and may be allocated under the formula described in Commission regulation §106.1(e). Other allocation formulas have been approved by the Commission as reasonable and may be used to determine the amount of get-out-the-vote expenditure which must be paid by the Democratic Campaign Committee of Michigan.

<sup>\*</sup>/Expenses incurred under the cited sample ballot exemption are neither contributions nor expenditures for purposes of the Act. They are not subject to any monetary limit and may be funded by either a reporting political committee or nonreporting entity. If financed by a reporting political committee, the amounts spent for sample ballot materials need to be reported as a "Disbursement for exempt sample ballot expenses" in order to account for all cash outlays of the reporting political committee. See Commission regulations at §104.2(b).

See the Commission's response to Advisory Opinion Request 1976-72 and a Commission guideline issued in December 1977, copies enclosed.

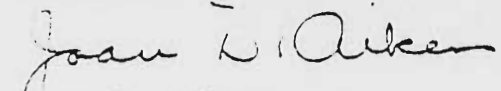
Your letter suggests that for the Commission to require that some portion of the Party's get-out-the-vote expenses be financed and reported by its registered Federal political committee would put the Party in violation of Michigan law. You state that Michigan law requires that all Party expenditures be made from one account. To the extent that Michigan law requires the Party to make or report expenditures differently than required by this opinion (which concludes that some portion of the described Party expenses come under the Act and must be financed by a reporting political committee) the Michigan law is superceded and preempted by virtue of 2 U.S.C. §453. That section provides that the Act, and regulations prescribed under the Act, "supercede and preempt any provision of State law with respect to election to Federal office." In addition, Commission regulations at 11 CFR 108.7(b)(1) and (b)(2) provide that the Act and Commission regulations supercede State law concerning the organization and registration of political committees supporting Federal candidates and the disclosure of receipts and expenditures by political committees. However, copies of reports filed under the Act with the Commission must also be filed with the Secretary of State "of the appropriate State." 2 U.S.C. §439(a) and 11 CFR 108.3. Accordingly, the Democratic Campaign Committee (Michigan) is required to file copies of its reports submitted under the Act with the Michigan Secretary of State.

In response to question (3) the expenditures of the drive allocable to Federal election purposes do not have to be further allocated to specific candidates for Federal office, and therefore charged against the party's limits in 2 U.S.C. §441a(d)(3), unless those expenditures are made on behalf of clearly identified candidates to whom the expenditures can be directly attributed. As discussed above, candidates for Federal office may be identified in conjunction with the drive without any charge to §441a limits, if the identification is made on materials coming within the sample ballot or slate card exemption. See the discussion in response to question (1).



This response constitutes an advisory opinion concerning the application of a general rule of law stated in the Act, or prescribed as a Commission regulation, to the specific factual situation set forth in your request. See 2 U.S.C. §437f.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Joan D. Aikens".

Joan D. Aikens  
Chairman for the  
Federal Election Commission

Enclosures

April 27, 1979

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

ADVISORY OPINION 1978-102

Willard A. Esselstyn  
Secretary Treasurer  
Coal Miners Political Action Committee  
900 Fifteenth Street, N.W.  
Washington, D.C. 20005

Dear Mr. Esselstyn:

This responds to your letter of December 15, 1978, as supplemented by your letter of February 12, 1979, requesting an advisory opinion on behalf of the Coal Miners Political Action Committee concerning the applicability of the Federal Election Campaign Act of 1971, as amended ("the Act"), and Commission regulations to the financing of television and radio announcements encouraging members of the United Mine Workers ("UMW") to vote in the November 1978 elections.

According to your letter, during the period preceding the 1978 general election the United Mine Workers of America used general union treasury funds to finance television and radio announcements which were broadcast in several states. You state that these announcements were directed to UMW members "encouraging them to get-out-and-vote." In some cases these announcements mentioned and advocated support of specific candidates for State office. In other cases you say that the announcements were "non-partisan" in nature and did not advocate any particular party or candidate. In no instance were candidates for Federal office mentioned.

Enclosed in the February letter were transcripts of the radio and television get-out-the-vote advertisements as well as a tape recording of the radio announcements (1 minute).

According to the transcripts (and the tape) the ads which you describe as nonpartisan did not mention, or indicate pictorially, support or opposition to any particular political party or candidate. Rather, in general terms the announcement talks to labor, advocates unity amongst union members, states that much was accomplished with the help of "friends" in political office, suggests that without union votes those "friends" could lose and then urges union members to vote on election day. In contrast to this general appeal, those spots which urged support of certain candidates for State office identified the "friends" of labor by mentioning their names, the offices for which they were running, and ultimately appealed for a vote for each of those candidates on November 7.

Specifically you ask the following:

- 1) Was it proper for us to consider this non-partisan activity permissible? If not, may we transfer voluntary funds from our political action committee (in the proper amount allocable to the Federal portion of the election) into our general treasury to come into compliance with the Act?
- 2) If allocation is necessary, may we apportion our costs by a simple ratio of the number of Federal elections per state in relation to the number of state and local elections, since our announcements would apply to all such elections?

The Commission considers the announcements supporting specific State candidates as outside the scope of the Act since, as to labor organizations, the prohibitions of §441b extend only to contributions and expenditures connected with an election of candidates to Federal office. Also, relevant definitions in 2 U.S.C. §431 are limited to influencing the nomination or election of persons to Federal office. See 2 U.S.C. §431(a) through (f).

The Act's general definition of "expenditure" specifically excludes "nonpartisan activity designed to encourage individuals to register to vote, or to vote." 2 U.S.C. §431(f)(4)(B). The statute in §441b, however, subjects corporations and labor unions to stricter standards than individuals when Federal elections are concerned. Section 441b provides, in

part, that it is unlawful for "any labor organization to make a contribution or expenditure in connection with" any Federal election - and although 5441b(b)(2)(B) specifically contains an exemption for the use of general treasury funds to conduct nonpartisan registration and get-out-the-vote campaigns, the exemption is restricted to a campaign aimed at the labor organization's members and their families.

Accordingly, 5114.4 of the Commission regulations which addresses nonpartisan communications places a labor organization under special constraints when engaging in nonpartisan activities connected with Federal elections which are not restricted to its members and their families. Section 114.4(d) specifically addresses nonpartisan registration and get-out-the-vote drives and permits a labor organization to support such a drive if the labor organization jointly sponsors the drive with a civic or other nonprofit organization which does not support or endorse candidates or political parties and which conducts the nonpartisan voting drive.

Since the get-out-the-vote campaign in question which reached the general public was sponsored solely by UMW, the activity was not conducted in conformance with Commission regulations. To be in compliance with the Act and regulations it is necessary that the cost of the get-out-the-vote announcements which did not specify a State candidate be allocated on a reasonable basis between Federal and non-Federal elections. (See Advisory Opinions 1978-30, 1978-23, and 1978-10 copies enclosed.) In this situation the Commission is of the opinion that a reasonable basis for allocation would be to determine the ratio of the number of Federal candidates seeking election in the areas reached by the announcement, to the total number of all 1978 candidates--Federal, State, and local--in that same area who were endorsed by the UMW or its PAC either to the general public or internally to union members. The resulting percentage should then be used to compute the portion of the expenses (only for those spots that did not identify any particular candidate, i.e. the "non-partisan" spots) that are regarded as Federal-election related. This amount should then be transferred from your political action committee (separate segregated fund) into the general treasury of UMW from which the full cost of the announcements was originally paid.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 1227  
West Virginia State Democratic )  
Executive Committee ("WVSDEC") )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 17, 1981, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1227:

1. Take no further action against the West Virginia State Democratic Executive Committee ("WVSDEC").
2. Send the letter as attached to General Counsel's Report dated February 19, 1981.
3. CLOSE THE FILE.

Attest:

3/17/81  
Date

Marjorie W. Emmons  
Marjorie W. Emmons  
Secretary to the Commission

Report Signed:	3-12-81
Received in Office of the Commission Secretary:	3-12-81, 5:02
Circulated on 48 hour vote basis:	3-13-81, 2:00

March 12, 1981

MEMORANDUM TO: Marjorie W. Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 1227

Please have the attached General Counsel's Report distributed to the Commission on a 48 hour tally basis.  
Thank you.



BEFORE THE FEDERAL ELECTION COMMISSION  
February 19, 1981

In the Matter of )  
 ) MUR 1227  
West Virginia State Democratic )  
Executive Committee ("WVSDEC") )

GENERAL COUNSEL'S REPORT

I. Background

On March 28, 1980, the Reports Analysis Division referred the West Virginia State Democratic Executive Committee ("WVSDEC") to the Office of General Counsel for failure to register and report to the Commission in violation of 2 U.S.C. §§ 433 and 434.

During the course of performing an audit of the West Virginia State Democratic Telethon Committee, the Audit Division of the Commission received copies of reports filed with the State of West Virginia by the WVSDEC. According to Audit, the state reports of the WVSDEC revealed that during November 1976 the WVSDEC made ten transfers totalling \$3,500 to two unregistered county committees and eight individuals for "election day expenses" and that during October 1978 the WVSDEC made 106 transfers totalling \$40,900 to 55 unregistered county committees for the same purpose. Thus, it was the opinion of Audit that the portion of activity allocable to federal elections may exceed \$1,000.

On August 4, 1980, the Commission found reason to believe the WVSDEC violated 2 U.S.C. §§ 433 and 434. On

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August 5, 1980, a notification letter and questions were mailed to the WVSDEC and the committee's response was received by the Office of General Counsel on September 11, 1980 (Attachment 1). An additional response was filed by the WVSDEC on January 15, 1981 (Attachment 2).

## II. Factual and Legal Analysis

### a. The facts

The September 11, 1980, response of the WVSDEC stated that although the committee engaged in get-out-the-vote ("GOTV") and voter registration activities during both 1976 and 1978, the activities were conducted only in the general election and did not include the support of "any federal candidates." According to the committee's reply, the transfers which were made in November 1976 were for "election day expenses" and were expended for the promotion of "the individual candidacy of those state candidates to whom contributions were made and in support of the state-wide slate, but not for the exclusive use or support of any federal candidate." The committee's reply emphasized that the funds were expended "without preference to any particular federal candidate." Similarly, the transfers made in October 1978 were described as being expended for use "solely and exclusively in the interest of the Democratic ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter, and posting and distributing signs, banners and other advertisements."



According to the September 1980 response of the WVSDEC and statements made by its counsel in telephone conversations with Office of General Counsel staff, the GOTV and voter registration activities involved herein included the printing and distribution of slate cards and sample ballots in both 1976 and 1978. 2/ While the WVSDEC could not identify the portion of the transfers which were expended on these particular exempted activities, the committee did state, in response to a Commission inquiry concerning slate card/sample ballot activity conducted in 1976, that the slate cards which were distributed had "reference only to state-wide offices" and "[n]o federal candidates were on these slates or the recipient or beneficiary of the Committee efforts." 3/

In regard to the apparent transfer of \$2,100 from the WVSDEC to the Kanawha County Democratic Executive Committee ("KCDEC") which formed a basis for a reason to believe finding, the response of the WVSDEC has asserted that it transferred \$1,100 to the KCDEC on October 13, 1978, rather than \$2,100, and that \$100 of the transfer was refunded

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2/ Counsel for the WVSDEC stated in a telephone conversation with staff of the Office of General Counsel on October 9, 1980, that it was his belief that some slate cards and/or sample ballots may have been printed in newspapers and thus not subject to the exemption of former 2 U.S.C. § 431(e)(5)(E) and (f)(4)(G).

3/ The state-wide offices printed on a slate card provided to the Commission were those of Governor, Secretary of State, Auditor, Treasurer, Attorney General, Commissioner of Agriculture, and three candidates for Supreme Court of Appeals.

by the KCDEC to the WVSDEC. In support of its claim, the WVSDEC submitted a letter dated January 7, 1981, from the treasurer of the KCDEC which states, pursuant to a review of the KCDEC files, that the KCDEC determined that it erroneously reported the receipt of \$2,100 from the WVSDEC. The letter explains that the KCDEC had in fact received only an \$1,100 transfer from the WVSDEC and that the KCDEC, in turn, refunded \$100 to the WVSDEC.

The WVSDEC has consistently argued that "[i]t is our belief that the State Committee is ... not a committee within the meaning of sections 433 and 434 of the Act." The committee's reply concludes that "we would hope to conduct our affairs solely for the purpose of state-wide candidates in order to remain solely within the jurisdiction of the West Virginia Secretary of State ... as we have ... [made] a concerted effort not to involve ourselves in federal election campaigns."

b. The law applicable

Prior to the passage of the 1979 Amendments to the Act a political committee was defined to include any committee, club, association, or other groups of persons which received contributions or made expenditures during a calendar year in an aggregate amount exceeding \$1,000. 2 U.S.C. § 431(d) and 11 C.F.R. § 100.14 (recodified at 2 U.S.C. § 431(4) and 11 C.F.R. § 100.5). While

the 1979 Amendments to the Act amended the definition of "political committee" in regard to local party committees 4/, the definition in regard to state party committees remained unaltered. See former 2 U.S.C. § 431(d) and present 2 U.S.C. § 431(4)(A).

Pursuant to 2 U.S.C. § 433, a political committee is required to register with the Commission within ten days of becoming a political committee under the Act. A political committee is further required by 2 U.S.C. § 434 to file periodic reports of receipts and expenditures with the Commission.

During the time period relevant to this matter, 2 U.S.C. § 431(e)(5)(E) and 11 C.F.R. § 100.4(b)(7) (recodified at 2 U.S.C. § 431(8)(B)(v) and 11 C.F.R. § 100.7(b)(9)), and 2 U.S.C. § 431(f)(4)(G) and 11 C.F.R. § 100.7(b)(11) (recodified at 2 U.S.C. § 431(9)(B)(iv) and 11 C.F.R. § 100.8(b)(10)), excluded from the definition of "contribution" and "expenditure," respectively, the payment, by a state or local committee of a political party, of the costs of preparation, display, or mailing or other distribution incurred by the committee with respect to a printed slate card, sample

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4/ Section 431(4)(A) of Title 2, United States Code, defines the term "political committee" to include any local committee of a political party which receives contributions, or makes payments exempted from the definition of contribution or expenditure, aggregating in excess of \$5,000 during a calendar year, or makes contributions or expenditures aggregating in excess of \$1,000 during a calendar year.

ballot, palm card, or other printed listing of three or more candidates for any public office for which an election is held in the state in which the committee is organized. The statute further provides that the costs incurred by a committee with respect to a display of a printed slate card or sample ballot are only exempted from the definition of "contribution" and "expenditure" if the costs are not incurred in connection with a display on broadcasting stations or in newspapers, magazines, or similar types of general public political advertising. Id.

The 1979 Amendments to the Act have exempted additional activity engaged in by both state and local party committees from the definition of "contribution" and "expenditure." Pursuant to 2 U.S.C. § 431(8)(B)(x) and 11 C.F.R. § 100.7(b)(15) and 2 U.S.C. § 431(9)(B)(viii) and 11 C.F.R. 100.8(b)(16), the payment by a state or local political party committee of the costs of campaign materials (such as pins, bumper stickers, handbills, brochures, party tabloids, and yard signs) used by such committee in connection with volunteer activities on behalf of the nominees of such party is neither a "contribution" nor "expenditure" provided that certain qualifications are met.

Further excluded, pursuant to the 1979 Amendments, from the definition of "contribution" and "expenditure" is the payment by a state or local committee of a political party of the costs of voter registration and get-out-the-vote

activities conducted by such committee on behalf of the nominees of such party for President and Vice-President provided that certain qualifications are met. 2 U.S.C. § 431(8)(B)(xii) and 11 C.F.R. § 100.7(b)(17); 2 U.S.C. § 431(9)(B)(ix) and 11 C.F.R. § 100.8(b)(18).

The Commission has recognized in Advisory Opinion 1978-50 that GOTV and voter registration expenditures are considered administrative expenses and may be allocated in the same manner as administrative expenses. Pursuant to 11 C.F.R. § 106.1(e) party committees and other political committees which have established federal campaign committees shall allocate administrative expenses on a reasonable basis between their federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis. The Commission has further recognized in Advisory Opinions 1978-50, 1978-28, 1978-102, 1978-10, Re: AOR 1976-72, and its December 1977 guideline, that various methods may be "reasonable" for the allocation of the GOTV expenses of political committees. Additionally, the Commission has held in AO 1978-28 that the expenses of a political party organization for GOTV drives in a federal election year are, at least in part, for the purpose of influencing the election of persons to federal office even though the drive is not conducted expressly or exclusively on behalf of federal candidates. See also AO 1978-50 and AO 1978-10.

The method of allocation set forth in Advisory Opinion 1978-102 is, in the General Counsel's view, the method most appropriate for the allocation of the GOTV expenses of the WVSDEC during both 1976 and 1978. The Commission determined in AO 1978-102 that a reasonable basis of allocation for GOTV activity is to determine the ratio of the number of federal candidates seeking election in the areas where get-out-the-vote activity is conducted, to the total number of all candidates, federal, state, and local, seeking office in the areas where get-out-the-vote activity is conducted. Thus, the application of this formula to the GOTV activity conducted by the WVSDEC and the committees and persons to whom the WVSDEC made transfers in 1976 for GOTV activity results in the determination that an amount of less than \$1,000 is the amount attributable to federal activity that year. 6/

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6/ In regard to the 1976 election, the response of the WVSDEC stated that seven federal candidates, 100 candidates for the House of Delegates, 17 candidates for the State Senate, seven candidates for state-wide offices, and at least four local candidates in each of the 55 counties of West Virginia were seeking office in November. The number of local offices, however, is a minimum number. The WVSDEC had difficulty in determining the number of state and local candidates as the Office of Secretary of State of West Virginia does not maintain ballot lists from previous elections. In connection with a further inquiry from the Office of General Counsel, the Secretary of State's office could only provide limited information to this office.

In addition to the \$3,500 transferred to individuals and county committees in 1976, it appears, based on documentation submitted by the WVSDEC, that the committee itself expended \$3,185.02 on GOTV activities. This (continued on next page)

As there is no evidence that the WVSDEC engaged in any other federal activity sufficient to qualify it as a political committee during 1976, it does not appear that the WVSDEC was required to register and report to the Commission during 1976.

The application of the same allocation method to GOTV activities conducted by the 55 county committees to whom the WVSDEC made transfers in 1978 also appears to result in a federal allocation of less than \$1,000. 7/

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6/ (continued) amount has been included in the allocation formula and the resulting federal allocation is \$826.27. In regard to this allocation it should be noted that if the total number of local candidates were known, and if the total amount expended on exempted activities were known, the federal allocation would become proportionally smaller. Moreover, as only candidates seeking office in those areas where GOTV activities were conducted are included in the allocation formula, and it appears to the Office of General Counsel that GOTV activities were conducted in only three counties, a parsimonious number of state and local candidates from the three counties are included in the formula. It seems likely, however, that additional state and local candidates, including those from additional counties, could have been included.

7/ The West Virginia Secretary of State's office did not maintain a list of state and local candidates seeking office in 1978 either. It did inform the Office of General Counsel, however, that an additional 10-20 candidates should be added to the total number of candidates for the House of Delegates to allow for vacancies and that the office of county commissioner was most likely on each county's ballot in November. This information has been included in the allocation formula. In addition, the formula included five federal candidates, 100 candidates for the House of Delegates, and 17 candidates for the State Senate. Such figures yield a federal allocation of \$1,063.40. However, the actual federal allocation would no doubt be less because many more local candidates were on the ballot and because a portion of the expenditures was used for sample ballot activities which should not be included in the computation.



Therefore, on the sole basis of the GOTV activity of the WVSDEC, it does not appear that the WVSDEC should be considered a "political committee" during 1978.

As discussed earlier the WVSDEC's 1978 GOTV activities constituted the making of transfers to 55 county committees. Although the Kanawha County Democratic Executive Committee ("KCDEC") was not registered at the time of its receipt of the transfer for "election day expenses" from the WVSDEC, it did subsequently register with the Commission three months later on January 3, 1979. <sup>8/</sup> Thus, it must be determined whether the \$1,000 transfer from the WVSDEC to the KCDEC would qualify the WVSDEC as a political committee. A review of reports filed by the KCDEC with both the Commission and the state of West Virginia has indicated that the KCDEC did not make any contributions to any federal candidates during 1978. Although, based on information reported to the state of West Virginia, the KCDEC appears to have engaged

---

<sup>8/</sup> At the time of its registration the KCDEC filed a 30 day post-general election report. The post-election report included no coverage dates and contained no information except to make reference to information contained in attached reports to be filed with the Secretary of State of West Virginia. The state reports covered the period of September 7, 1978, through October 28, 1978. On March 27, 1979, the KCDEC filed a 1978 Year-End Report which reported no receipts or expenditures for the period December 4, 1978, through December 31, 1978.

In May of 1979 the chairman of the KCDEC informed the Commission that the KCDEC registered with the Commission because the treasurer thought that filings were required if the committee received money from federal candidates.



in GOTV activities, it has not been possible to determine if the amount allocable to federal activity was in excess of \$1,000 at the time the transfer was received from the WVSDEC. However, as it appears that the majority of the KCDEC's GOTV expenditures were incurred in connection with GOTV activities conducted after the transfer from the WVSDEC was received, it does not seem that the KCDEC was a "political committee" itself when it received the \$1,000 transfer from the WVSDEC. All of the transfers of the WVSDEC should be considered, therefore, to have been made to county committees not subject to the Commission's jurisdiction. 9/

In sum, based on available information, it appears that the federal GOTV activity of the WVSDEC was less than \$1,000 and that the WVSDEC did not engage in any other federal activity during 1978. In view of these apparent circumstances, the General Counsel recommends that the Commission take no further action against the WVSDEC. The General Counsel recommends, however, that the Commission advise the WVSDEC, through the attached letter,

---

9/ It should also be noted that the WVSDEC was operating under the assumption that since the KCDEC was not registered with the Commission in October 1978 when the transfer was made, the transfer would not trigger registration and reporting requirements for the WVSDEC.

that in the future it must take care to allocate GOTV activities to federal elections if the activities are conducted in a federal election year or are on behalf of federal candidates.


#### RECOMMENDATIONS

1. Take no further action against the West Virginia State Democratic Executive Committee ("WVSDEC").
2. Send the attached letter.
3. Close the file.

#### Attachments

- 1 - response of WVSDEC
- 2 - " " "
- 3 - proposed letter

12 March 1981  
Date

  
\_\_\_\_\_  
Charles N. Steele  
General Counsel

ATTACHMENT # 1

EDWARD REBROOK III  
ATTORNEY AT LAW  
SUITE 344 MORRISON BUILDING  
815 QUARRIER STREET  
CHARLESTON, WEST VIRGINIA 25301  
TELEPHONE (304) 342-7125

RECEIVED

White  
GCC# 2600  
80 SEP 11 12:02

September 4, 1980

Ms. Maura White  
Federal Election Commission  
Washington, D. C. 20463

Dear Ms. White:

On August 5, 1980 Max L. Friedersdorf, Chairman of the Federal Election Commission, wrote to the Treasurer of the West Virginia State Democratic Executive Committee informing him that the Commission had found evidence that the Committee may have violated sections 433 and 434 of the Federal Election Campaign Act.

Pursuant to our recent telephone conversation in which you extended the time for the Committee to answer, I hereby submit this response as the formal reply to the seven questions propounded by the Commission.

1. Did the WVSDEC engage in any get-out-the-vote ("GOVT") or voter registration activities during 1976 or 1978? If the answer is yes, state, for each year, whether or not the activities included the support of federal candidates.
  - A. Yes, for 1976. Yes, for 1978, but in both instances only in support of the slate of the Democratic Party -- only in the General Election -- and not in support of any federal candidates.
- 2a) Explain the nature and purpose (e.g. taking voters to the polls, slate card/sample ballot) of all transfers, as reported to the state of West Virginia, made by the WVSDEC to individuals or county committees for "general election

Ms. Maura White  
September 4, 1980  
Page two

day expenses," totaling \$3,500. on November 1, 1976.

- A. To promote the individual candidacy of those state candidates to whom contributions were made and in support of the state-wide slate, but not for the exclusive use or support of any federal candidate.
- b) For all transfers made on November 1, 1976, for "general election day expenses," list the name of all federal candidates on whose behalf GOVT or voter registration expenses were incurred and explain the activity which constituted the expense?
- A. The funds expended on November 1, 1976 and listed as "general election day expenses" were used to promote the candidacies for all Democrat candidates, state and local, without preference to any particular federal candidate. However, in addition to the state and local candidates, the offices of President, Vice President, 1 United States Senator and 4 members of the U.S. House of Representatives were on the ballot at that election period.
- c) What portion of the \$3,500 expended on November 1, 1976, for "general election day expenses" was spent on the costs of preparation, display, mailing, or other distribution, with respect to a printed slate card or sample ballot, or other printed listing, of three or more candidates for any public office for which an election was held in West Virginia, and where such costs were not incurred with respect to a display made on broadcasting stations, newspapers, magazines, or similar types of general public political advertising?
- A. Because West Virginia is a rural state and a good number of the voters live a considerable distance from their respective polling places,

Ms. Maura White  
September 4, 1980  
Page three

it has long been a practice of local political organizations to hire drivers to shuttle voters to and from the polls. This activity is conducted on behalf of the entire slate, usually for the interest of local candidates and without regard for federal candidates.

3. For all transfers made on November 1, 1976, for "general election day expenses," state and name of all candidates (both federal and state), by office sought, who were seeking election in those areas where GOVT or voter registration expenses were incurred.
  - A. The Secretary of State for the State of West Virginia has informed the Committee that it does not keep copies of ballots or sample ballots which were used for the 1976 general election. However, the Committee did prepare and distribute party slates, a copy of which is attached hereto and marked for identification as Exhibit No. 1. Please note that this slate has reference only to state-wide offices which were: Governor, Secretary of State, Auditor, Treasurer, Attorney General, Commissioner of Agriculture and Justice of the Supreme Court of Appeals. No federal candidates were on these slates or the recipient or beneficiary of the Committee efforts. In addition to the above-listed state-wide offices, there were 100 Democratic candidates for the House of Delegates and 17 Democratic candidates for the State Senate. Additionally, in each of the 55 counties there were candidates for Judge, Prosecuting Attorney, County Commission, Clerks of the Courts, etc., et al., all of whom hopefully were helped by the efforts of the Committee. Again, none of these activities were directed toward federal candidates.
- 4a) Explain the nature and purpose (e.g. taking voters to the polls, slate card/sample ballot) of all transfers, as reported to the state of West Virginia, made by the WVSDEC to individuals and county committees for "general election day expenses," totalling \$40,900 on October 13 and 30, 1978.

Ms. Maura White  
September 4, 1980  
Page four

- A. Attached hereto and marked Exhibit No. 2 are photostatic copies of the several checks issued by the Committee on October 13 and 30, 1978. All of the checks bear a disclaimer specifically informing the recipient what use could be made of said funds.
- b) For all transfers made on October 13 and 30, 1978, for "general election day expenses," list the name of all federal candidates on whose behalf GOVT or voter registration expenses were incurred and explain the activity which constituted the expense.
- A. Jennings Randolph was the Democratic candidate for re-election to the U. S. Senate; Robert H. Mollohan, Harley O. Staggers, John M. Slack, Jr., and Nick Joe Rahall, II were the Democratic candidates for the U.S. House of Representatives from West Virginia's four Congressional districts. However, while GOVT activities may have inured to their benefit, none of these activities were undertaken and no expenses were incurred solely or exclusively for their benefit.
- c) What portion of the \$40,900 expended on October 13 and October 30, 1978, for "general election day expenses" was spent on the costs or preparation, display, mailing, or other distribution, with respect to a printed slate card or sample ballot, or other printed listing, of three or more candidates for public office for which an election was held in West Virginia, and where such costs were not incurred with respect to a display made on broadcasting stations, newspapers, magazines, or similar types of general public political advertising?
- A. Some of the recipients used these contributions to print slate cards and other material. Exhibit No. 1, above, has reference to the printed slates. Exhibit 2 has reference to the aforementioned disclaimer informing the recipients the uses for which said funds could be expended.



Ms. Maura White  
September 4, 1980  
Page five

5. For all transfers made on October 13 and 30, 1978, for "general election day expenses," state the name of all candidates (both federal and state), by office sought, who were seeking election in those areas where GOVT or voter registration expenses were incurred.
  - A. 1 U. S. Senator, 4 Congressional seats, 100 candidates for the House of Delegates and 17 candidates for the State Senate, along with numerous county and local offices.
6. In addition to the "general election day expenses" incurred by the WVSDEC on November, 1976, and October 13 and 30, 1978, has the WVSDEC engaged in any other GOVT or voter registration activities? If the answer is yes, please explain the nature of the activity, the amounts expended on that activity, and the date the activity occurred.
  - A. No.
7. Explain the nature and purpose of the transfer of \$1,000 to the Kanawha County Democratic Executive Committee, a federally registered committee, on or about November 4, 1978?
  - A. The \$1,000.00 check made payable to the Kanawha County Democratic Executive Committee, a copy of which is attached hereto with Exhibit 2, bears the same disclaimer shown on the checks issued to all other county executive committees.

In addition to the information we have supplied here in response to your questions, I have read with interest the report prepared by you and David Branch which is titled "Notification of Reason to Believe Finding". One of the concerns raised in your report was the 106 transfers totalling \$40,900 made by the Committee in 1978 and 10 transfers totalling \$3,500 made by the Committee in 1976. I have attached for your perusal copies of all of those transfers, the purpose of said transfers being clearly indicated on the checks themselves demonstrating that when made to a county committee its purposes were clearly defined within your guidelines;



Ms. Maura White  
September 4, 1980  
Page six

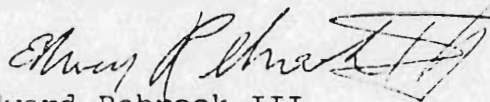
and when made to a candidate for state or local office within the guidelines of state election law which does not come under your jurisdiction.

Also please find, as per your stated concern, that while the Committee did transfer \$1100.00 to the Kanawha County Democratic Executive Committee, that \$100.00 of that transfer was returned to the State Committee in order that we would be in compliance with both the federal and state law regarding maximum campaign contributions.

Additionally, attached hereto and marked as Exhibit No. 3 is a letter, dated March 12, 1979, to the Committee from Robert J. Costa, Assistant Staff Director for the Audit Division of the Federal Election Commission, finding that the West Virginia State Democratic Telethon Committee was ~~not~~ a political committee as defined by section 431 and was, therefore, not subject to the jurisdiction of your Commission. It is our belief that the State Executive Committee is also not a committee within the meaning of sections 433 and 434 of the Act, and we would hope to conduct our affairs solely for the purpose of state-wide candidates in order to remain solely within the jurisdiction of the West Virginia Secretary of State and to avoid the necessity of filing the numerous forms required by your Commission which would be a great hardship on our Committee inasmuch as we have only one paid staff member and make a concerted effort not to involve ourselves in federal election campaigns.

We trust this response will adequately comply with your request for information, and if further documentation is necessary, please direct the same to me.

Yours sincerely,



Edward Rebrook III  
Counsel to the West Virginia  
State Democratic Executive Committee

ERIII:fb

Attachments

ATTACHMENT # 2

*White*  
EDWARD REBROOK III

ATTORNEY AT LAW

SUITE 344 MORRISON BUILDING

815 QUARRIER STREET

CHARLESTON, WEST VIRGINIA 25301

TELEPHONE (304) 342-7125

January 13, 1981

11 JAN 15 12:50

11 JAN 15 12:36

Ms. Maura White  
Office of General Counsel  
Federal Elections Commission  
1325 K. Street, N. W.  
Washington, D. C. 20463

Dear Maura:

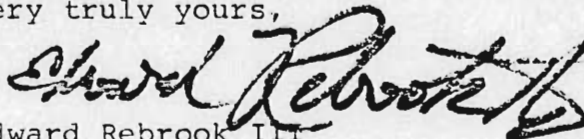
Pursuant to our recent telephone conversation wherein you informed me of your decision to ask the Commission to make a finding of probable cause against the State Democratic Executive Committee of West Virginia unless I could provide you with some information concerning certain financial transactions made prior to the 1978 General Election, enclosed please find the following:

1. A letter to me from Eugene Hoyer, Treasurer of the Kanawha County Democratic Executive Committee (a registered committee), explaining the \$1,100.00 contribution made by the State Committee to the Kanawha County Committee, and the return of the \$100.00 excess to the State Committee. The letter also explains the additional financial transaction between the two committees about which you had questions;

2. Photostatic copies of the checks written by the State Committee, made payable to the Kanawha County Committee, in the amount of \$1,100.00; and, checks in the amount of \$500.00 each to Roger W. Tompkins and Lyle Sattes.

I trust that these documents will be of assistance to you in making your determination.

Very truly yours,



Edward Rebrook III

ERIII:fb

Enclosures

cc: West Virginia State Democratic Executive Committee

HOYER, SERGENT AND BERTHOLD

ATTORNEYS AT LAW

22 CAPITOL STREET

CHARLESTON, WEST VIRGINIA 25301

304/344-9821

EUGENE R. HOYER  
STANLEY H. SERGENT, JR.  
RALPH W. HOYER  
ROBERT V. BERTHOLD, JR.

January 7, 1981

Mr. Edward Rebrook, III  
Counsel  
West Virginia State Democratic  
Executive Committee  
2106 Kanawha Boulevard East  
Charleston, West Virginia 25305

Dear Ed:

Pursuant to our recent conversation concerning the financial transactions which occurred between the State Committee and the Kanawha County Democratic Executive Committee in conjunction with the 1978 general election, I have reviewed my files and have made the following determination:

That on October 13, 1978, the State Committee made a donation to the Kanawha County Committee in the amount of \$1,100.00. Since \$1,000.00 is the maximum allowable contribution, we returned the excess (\$100.00) to the state committee.

Thereafter, the State Committee, on November 3, 1978, made \$500.00 contributions each to Roger Tompkins and Lyle Sattes, both of whom were candidates for the House of Delegates. Mr. Sattes and Mr. Tompkins both, in turn, endorsed their contributions and made them payable to the county committee. Inadvertently, I listed the checks on our report as coming from the state committee when, in fact, they should have been listed as coming from Roger Tompkins and Lyle Sattes.

At that time, as you know, I was the treasurer of the Kanawha County Committee and I have full knowledge of all our financial transactions. I can assure you, and you, in turn, can assure the FEC, that at no time did the State Committee ever make a contribution, either in cash or in kind, that was in excess of the limits allowed by either state or federal election law.

Page Two - Mr. Edward Rebrook, III

January 7, 1981

I hope this explanation will assist you in complying with the FEC's requests for information. If I can be of further service, please feel free to call on me.

Yours very truly,



Eugene R. Hoyer

ERH:llh

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1653

October 13 1978

89-373  
519

Eleven Hundred and 00/100

DOLLARS \$1100.00

TO  
THE  
ORDER  
OF

The Treasurer,  
Kanawha County Democratic Executive Committee

THE NATIONAL  
FEDERAL RESERVE BANK  
WASHINGTON, D.C.

40514-0373: 01 6440 0401

*James Bailey*  
NEGOTIABLE

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-5 V-6

DATE	DESCRIPTION	AMOUNT		
10/13/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	100.00		
			TOTAL DEDUCTIONS	NET PAY

*\$100.00 error  
refunded 10/30/78  
+ deposited  
in Apr. acct.  
J.B.*

1720

November 3 1978

62-576  
219

Five Hundred and 00/100

DOLLARS \$ 500.00

TO  
THE  
OFFICE  
OF

Roger W. Tompkins

THE NATIONAL  
BUREAU OF INVESTIGATION  
WASHINGTON, D. C. 20535

120519-037612 01 2440 0801

James L. Bailey  
JAMES L. BAILEY  
00001

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DATE	DESCRIPTION	AMOUNT	POST. NO.	INITIALS
11/3/78	Roger W. Tompkins - Political Contribution	\$500.00		

EMPLOYER

[illegible]



ATTACHMENT # 3: PROPOSED LETTER



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Edward Rebrook, III  
Suite 344, Morrison Building  
815 Quarrier Street  
Charleston, West Virginia 25301

Re: MUR 1227

Dear Mr. Rebrook:

On August 4, 1980, the Commission found reason to believe that your client, the West Virginia State Democratic Executive Committee ("WVSDEC"), violated 2 U.S.C. §§ 433 and 434, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you, for your future activity, that the payment of "get-out-the-vote" expenses by the WVSDEC may qualify the WVSDEC as a political committee under the Act (see 2 U.S.C. § 431(4)(A)). During a federal election year, "get-out-the-vote" expenses should be allocated on a reasonable basis between federal and non-federal activity even though the activity is not conducted expressly on behalf of federal candidates. See Advisory Opinions 1978-50 and 1978-102 (copies enclosed). Please note that certain types

Letter to Edward Rebrook, III  
Page 2

of get-out-the-vote expenses are exempted from the definition of "contribution" and "expenditure" under the Act and, thus, need not be included in the allocation formula. See 2 U.S.C. § 431(8)(A)(v), (x), and (xii) and 2 U.S.C. § 431(9)(B)(iv), (viii), and (ix). The portion of funds attributable to federal activity, however, must be paid from funds lawfully contributed under the Act. See 11 C.F.R. § 102.5 (b).

If you have any questions please contact Maura White, the staff member assigned to this matter, at 202/523-4060.

Sincerely,

Charles N. Steele  
General Counsel

Enclosures

that in the future it must take care to allocate GOTV activities to federal elections if the activities are conducted in a federal election year or are on behalf of federal candidates.

#### RECOMMENDATIONS

1. Take no further action against the West Virginia State Democratic Executive Committee ("WVSDEC").
2. Send the attached letter.
3. Close the file.

#### Attachments

- 1 - response of WVSDEC
- 2 - " " "
- 3 - proposed letter

MW;rd  
ST  
KG

*mm* 2/19/81  
*ST* 2/20/81

*file copy*



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY *me*  
OFFICE OF THE SECRETARY TO THE COMMISSION

DATE: JANUARY 26, 1981

SUBJECT: MUR 1227 - Interim Investigative Report #3,  
dated 1-21-81; Signed 1-22-81; Received  
in OCS 1-22-81, 5:06

The above-named document was circulated to the Commission on a no-objection basis at 2:00, January 23, 1981.

There were no objections to the Interim Investigative Report at the time of the deadline.

January 22, 1981

MEMORANDUM TO: Marjorie W. Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 1227

Please have the attached Interim Investigative Report distributed to the Commission on a 24 hour no-objection basis. Thank you.

Attachment

PAKayson

cc: White

BEFORE THE FEDERAL ELECTION COMMISSION  
January 21, 1981

In the Matter of           )  
                                  )  
West Virginia State        )  
Democratic Executive       )  
Committee ("WVSDEC")      )

MUR 1227

Interim Investigative Report #3

On January 15, 1981, the Office of General Counsel received additional information from the WVSDEC. It now appears that one transfer which WVSDEC made to a registered political committee did not in fact exceed \$1,000.

The Office of General Counsel is in the process of reviewing all information pertinent to this matter and will make a recommendation to the Commission shortly.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Charles N. Steele  
General Counsel

MW;rd  
ST  
KAG

1/21/81 KST

*file copy*



BEFORE THE FEDERAL ELECTION COMMISSION  
January 21, 1981

JAN 22 P 5: 06

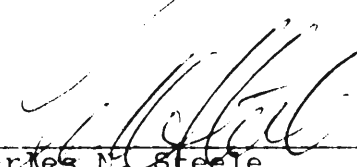
In the Matter of )  
 )  
West Virginia State ) MUR 1227  
Democratic Executive )  
Committee ("WVSDEC") )

Interim Investigative Report #3

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22 January 1981  
Date

  
\_\_\_\_\_  
Charles M. Steele  
General Counsel

EDWARD REBROOK III  
ATTORNEY AT LAW  
SUITE 344 MORRISON BUILDING  
815 QUARRIER STREET  
CHARLESTON, WEST VIRGINIA 25301  
TELEPHONE (304) 342-7125

January 13, 1981

Ms. Maura White  
Office of General Counsel  
Federal Elections Commission  
1325 K. Street, N. W.  
Washington, D. C. 20463

1 JAN 15 1981 2:36

Dear Maura:

Pursuant to our recent telephone conversation wherein you informed me of your decision to ask the Commission to make a finding of probable cause against the State Democratic Executive Committee of West Virginia unless I could provide you with some information concerning certain financial transactions made prior to the 1978 General Election, enclosed please find the following:

1. A letter to me from Eugene Hoyer, Treasurer of the Kanawha County Democratic Executive Committee (a registered committee), explaining the \$1,100.00 contribution made by the State Committee to the Kanawha County Committee, and the return of the \$100.00 excess to the State Committee. The letter also explains the additional financial transaction between the two committees about which you had questions;

2. Photostatic copies of the checks written by the State Committee, made payable to the Kanawha County Committee, in the amount of \$1,100.00; and, checks in the amount of \$500.00 each to Roger W. Tompkins and Lyle Sattes.

I trust that these documents will be of assistance to you in making your determination.

Very truly yours,

  
Edward Rebrook III

ERIII:fb

Enclosures

cc: West Virginia State Democratic Executive Committee

HOYER, SERGENT AND BERTHOLD

ATTORNEYS AT LAW

22 CAPITOL STREET

CHARLESTON, WEST VIRGINIA 25301

304/344-9821

EUGENE B. HOYER  
STANLEY H. SERGENT, JR.  
RALPH W. HOYER  
ROBERT A. BERTHOLD, JR.

January 7, 1981

Mr. Edward Rebrook, III  
Counsel  
West Virginia State Democratic  
Executive Committee  
2106 Kanawha Boulevard East  
Charleston, West Virginia 25305

Dear Ed:

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Thereafter, the State Committee, on November 3, 1978, made \$500.00 contributions each to Roger Tompkins and Lyle Sattes, both of whom were candidates for the House of Delegates. Mr. Sattes and Mr. Tompkins both, in turn, endorsed their contributions and made them payable to the county committee. Inadvertently, I listed the checks on our report as coming from the state committee when, in fact, they should have been listed as coming from Roger Tompkins and Lyle Sattes.

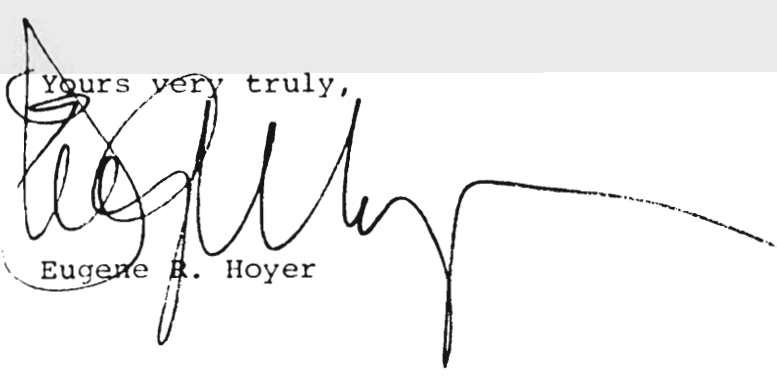
At that time, as you know, I was the treasurer of the Kanawha County Committee and I have full knowledge of all our financial transactions. I can assure you, and you, in turn, can assure the FEC, that at no time did the State Committee ever make a contribution, either in cash or in kind, that was in excess of the limits allowed by either state or federal election law.

Page Two - Mr. Edward Rebrook, III

January 7, 1981


I hope this explanation will assist you in complying with the FEC's requests for information. If I can be of further service, please feel free to call on me.

Yours very truly,



Eugene B. Hoyer

ERH:llh



W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2106 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1653

October 13 1978

62-375  
519

Eleven Hundred and 00/100

DOLLARS \$1100.00

TO  
THE  
TREASURER

The Treasurer,  
Kanawha County Democratic Executive Committee

THE NATIONAL

00519-0375: 01 6440 0401

*James Bailey*  
NEGOTIABLE

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DATE

DESCRIPTION

AMOUNT

10/13/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

100.00

*\$1000 error & refunded 10/20/78  
deposited in apw. acct. J.B.*

1720

69-376  
519

DOLLARS \$ 500.00

Roger W. Tompkins

1:05 29-0376: 01 64.0 0001

*Jewell Bailey*  
NOT NEGOTIABLE  
00001

DELUXE - FORM WVE-3 V-1

DATE	DESCRIPTION	AMOUNT	POST. NO.
11/3/78	Roger W. Tompkins - Political Contribution	\$500.00	

[illegible]

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2106 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1721

November 3 1978

69-276  
519

Five Hundred and 00/100

DOLLARS \$500.00

TO  
THE  
ORDER  
OF

Lyle Sattes

THE NATIONAL  
FEDERAL RESERVE  
SYSTEM

⑈0514⑈0375⑈ 01 2440 0001

*James H. Bradley*  
JAMES H. BRADLEY

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVD-3 V-6

DATE	DESCRIPTION	AMOUNT	SIGNATURE
11/3/78	Lyle Sattes - Political Contribution	\$500.00	

EARNINGS				TOTAL EARNINGS	DEDUCTIONS			NET PAY
EMPLOYEE	RATE	AMOUNT	QUARTERLY AND OTHER		SOCIAL SECURITY TAX	FEDERAL INCOME TAX	STATE INCOME TAX	



EDWARD REBROOK III

ATTORNEY AT LAW

SUITE 344 MORRISON BUILDING

815 QUARRIER STREET

CHARLESTON, WEST VIRGINIA 25301



Ms. Maura White  
Office of General Counsel  
Federal Elections Commission  
1325 K. Street, N. W.  
Washington, D. C. 20463



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY ~~\_\_\_\_\_~~

DATE: NOVEMBER 5, 1980

SUBJECT: MUR 1227 - Interim Investigative Report #2,  
dated 10-30-80; Signed 11-3-80; Received  
in OCS 11-4-80, 11-4-80, 10:57

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 4:00, November 4, 1980.

There were no objections to the Interim Investigative Report at the time of the deadline.

November 4, 1980

MEMORANDUM TO: Marjorie W. Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 1227

Please have the attached Interim Invest Report distributed to the Commission. Thank you.

BEFORE THE FEDERAL ELECTION COMMISSION  
October 30, 1980

In the Matter of )  
 )  
West Virginia State ) MUR 1227  
Democratic Executive )  
Committee ("WVSDEC") )

80 NOV 4 A10: 57

Interim Investigative Report #2

On October 23, 1980, the Office of General Counsel mailed a letter to the Kanawha County Democratic Executive Committee ("KCDEC") requesting information concerning its receipt of two transfers from the WVSDEC during 1978. Pursuant to an October 9, 1980, telephone conversation between a staff member of the Office of General Counsel and the WVSDEC, the WVSDEC is seeking to obtain information from the various counties in West Virginia to determine the number of offices on the ballot in 1978. Both the response of the KCDEC and the result of the WVSDEC's inquiries into the complete 1978 ballot list of West Virginia are instrumental in determining whether the WVSDEC violated the Act. Following receipt of this information, the Office of General Counsel will make a further report to the Commission.

3 November 1980  
Date

  
\_\_\_\_\_  
Charles N. Steele  
General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 23, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Eugene Hoyer, Treasurer  
Kanawha County Democratic  
Executive Committee  
22 Capital Street  
Charleston, West Virginia 25301

Re: MUR 1227

Dear Mr. Hoyer:

The Office of General Counsel requests your assistance in clarifying certain information which was reported on the 1978 Year-End Report of the Kanawha County Democratic Executive Committee ("KCDEC").

The 1978 Year-End Report of the KCDEC reported the receipt of two transfers from the West Virginia State Democratic Executive Committee ("WVSDEC"). Transfers of \$1,100 and \$1,000 were reported as received by the KCDEC on October 23, 1978, and November 4, 1978, respectively. Please provide this office with copies of all documentation which verifies the receipt of both transfers. Such documentation should include, where available, copies of the checks issued by the WVSDEC to the KCDEC. Additionally, if the KCDEC refunded any portion of either transfer from the WVSDEC, please

PS Form 3811, Aug. 1978

1. The following service is requested (check one): <input type="checkbox"/> Show to whom and date delivered. <input type="checkbox"/> Show to whom, date, and address of delivery. <input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered. <input type="checkbox"/> RESTRICTED DELIVERY. Show to whom, date, and address of delivery. \$ (CONSULT POSTMASTER FOR FEES)		2. ARTICLE ADDRESSED TO: Eugene Hoyer, Treasurer KCDEC 22 Capital Street Charleston, West Virginia 25301	
3. ARTICLE DESCRIPTION: <i>Quarterly Report</i> REGISTERED NO. 947009 CERTIFIED NO. 15301 INSURED NO.		4. (Always obtain signature of addressee or agent) I have received the article described above. SIGNATURE <input type="checkbox"/> Addressee <input checked="" type="checkbox"/> Authorized agent DATE OF DELIVERY 10-27-80 POSTMARK	
5. ADDRESS (Complete only if requested) 10:21d 03:00g		6. UNABLE TO DELIVER BECAUSE	
CLERK'S INITIALS			

1227 White

☆ GPO: 1978-272-382

iated.

t Maura



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*

DATE: OCTOBER 1, 1980

SUBJECT: MUR 1227 - Interim Investigative Report #1,  
dated 9-25-80; Signed 9-29-80; Received  
in OCS 9-29-80, 4:58

The above-named document was circulated to the Commission on a no-objection basis at 11:00, September 30, 1980.

There were no objections to the Interim Investigative Report at the time of the deadline.

September 29, 1980

MEMORANDUM TO: Marjorie W. E.mons  
FROM: Jane Colgrove  
SUBJECT: MUR 1227

Please have the attached Interim Investigative Report on MUR 1227 distributed to the Commission on a 48 hour tally basis.

Thank you.



BEFORE THE FEDERAL ELECTION COMMISSION  
September 25, 1980

80 SEP 29 P 4: 58

In the Matter of

West Virginia State Democratic  
Executive Committee

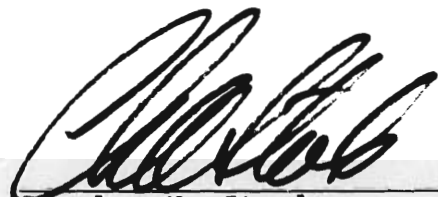
)  
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)  
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MUR 1227

INTERIM INVESTIGATIVE REPORT #1

On August 4, 1980, the Commission determined that there is reason to believe that the West Virginia State Democratic Executive Committee ("WVSDEC") violated 2 U.S.C. §§ 433 and 434. On August 5, 1980, a reason to believe notification letter was mailed to the WVSDEC and its response was received by the Office of General Counsel on September 11, 1980. On September 24, 1980, the Office of the Secretary of State of West Virginia supplied the Office of General Counsel with information pertinent to this matter. The Office of General Counsel is currently reviewing the responses received in this matter and will make a recommendation to the Commission shortly.

29 Sep 1980  
Date

  
Charles N. Steele  
General Counsel

EDWARD REBROOK III  
ATTORNEY AT LAW  
SUITE 344 MORRISON BUILDING  
815 QUARRIER STREET  
CHARLESTON, WEST VIRGINIA 25301  
TELEPHONE (304) 342-7125

RECEIVED  
GOC # 2600  
80SEP11 P12:02

September 4, 1980

Ms. Maura White  
Federal Election Commission  
Washington, D. C. 20463

Dear Ms. White:

On August 5, 1980 Max L. Friedersdorf, Chairman of the Federal Election Commission, wrote to the Treasurer of the West Virginia State Democratic Executive Committee informing him that the Commission had found evidence that the Committee may have violated sections 433 and 434 of the Federal Election Campaign Act.

Pursuant to our recent telephone conversation in which you extended the time for the Committee to answer, I hereby submit this response as the formal reply to the seven questions propounded by the Commission.

1. Did the WVSDEC engage in any get-out-the-vote ("GOVT") or voter registration activities during 1976 or 1978? If the answer is yes, state, for each year, whether or not the activities included the support of federal candidates.
  - A. Yes, for 1976. Yes, for 1978, but in both instances only in support of the slate of the Democratic Party -- only in the General Election -- and not in support of any federal candidates.
- 2a) Explain the nature and purpose (e.g. taking voters to the polls, slate card/sample ballot) of all transfers, as reported to the state of West Virginia, made by the WVSDEC to individuals or county committees for "general election

day expenses," totaling \$3,500. on November 1, 1976.

- A. To promote the individual candidacy of those state candidates to whom contributions were made and in support of the state-wide slate, but not for the exclusive use or support of any federal candidate.
- b) For all transfers made on November 1, 1976, for "general election day expenses," list the name of all federal candidates on whose behalf GOVT or voter registration expenses were incurred and explain the activity which constituted the expense?
- A. The funds expended on November 1, 1976 and listed as "general election day expenses" were used to promote the candidacies for all Democrat candidates, state and local, without preference to any particular federal candidate. However, in addition to the state and local candidates, the offices of President, Vice President, 1 United States Senator and 4 members of the U.S. House of Representatives were on the ballot at that election period.
- c) What portion of the \$3,500 expended on November 1, 1976, for "general election day expenses" was spent on the costs of preparation, display, mailing, or other distribution, with respect to a printed slate card or sample ballot, or other printed listing, of three or more candidates for any public office for which an election was held in West Virginia, and where such costs were not incurred with respect to a display made on broadcasting stations, newspapers, magazines, or similar types of general public political advertising?
- A. Because West Virginia is a rural state and a good number of the voters live a considerable distance from their respective polling places,

Ms. Maura White  
September 4, 1980  
Page three

it has long been a practice of local political organizations to hire drivers to shuttle voters to and from the polls. This activity is conducted on behalf of the entire slate, usually for the interest of local candidates and without regard for federal candidates.

3. For all transfers made on November 1, 1976, for "general election day expenses," state and name of all candidates (both federal and state), by office sought, who were seeking election in those areas where GOVT or voter registration expenses were incurred.
- A. The Secretary of State for the State of West Virginia has informed the Committee that it does not keep copies of ballots or sample ballots which were used for the 1976 general election. However, the Committee did prepare and distribute party slates, a copy of which is attached hereto and marked for identification as Exhibit No. 1. Please note that this slate has reference only to state-wide offices which were: Governor, Secretary of State, Auditor, Treasurer, Attorney General, Commissioner of Agriculture and Justice of the Supreme Court of Appeals. No federal candidates were on these slates or the recipient or beneficiary of the Committee efforts. In addition to the above-listed state-wide offices, there were 100 Democratic candidates for the House of Delegates and 17 Democratic candidates for the State Senate. Additionally, in each of the 55 counties there were candidates for Judge, Prosecuting Attorney, County Commission, Clerks of the Courts, etc., et al., all of whom hopefully were helped by the efforts of the Committee. Again, none of these activities were directed toward federal candidates.
- 4a) Explain the nature and purpose (e.g. taking voters to the polls, slate card/sample ballot) of all transfers, as reported to the state of West Virginia, made by the WVSDEC to individuals and county committees for "general election day expenses," totalling \$40,900 on October 13 and 30, 1978.

Ms. Maura White  
September 4, 1980  
Page four

- A. Attached hereto and marked Exhibit No. 2 are photostatic copies of the several checks issued by the Committee on October 13 and 30, 1978. All of the checks bear a disclaimer specifically informing the recipient what use could be made of said funds.
- b) For all transfers made on October 13 and 30, 1978, for "general election day expenses," list the name of all federal candidates on whose behalf GOVT or voter registration expenses were incurred and explain the activity which constituted the expense.
- A. Jennings Randolph was the Democratic candidate for re-election to the U. S. Senate; Robert H. Mollohan, Harley O. Staggers, John M. Slack, Jr., and Nick Joe Rahall, II were the Democratic candidates for the U.S. House of Representatives from West Virginia's four Congressional districts. However, while GOVT activities may have inured to their benefit, none of these activities were undertaken and no expenses were incurred solely or exclusively for their benefit.
- c) What portion of the \$40,900 expended on October 13 and October 30, 1978, for "general election day expenses" was spent on the costs or preparation, display, mailing, or other distribution, with respect to a printed slate card or sample ballot, or other printed listing, of three or more candidates for public office for which an election was held in West Virginia, and where such costs were not incurred with respect to a display made on broadcasting stations, newspapers, magazines, or similar types of general public political advertising?
- A. Some of the recipients used these contributions to print slate cards and other material. Exhibit No. 1, above, has reference to the printed slates. Exhibit 2 has reference to the aforementioned disclaimer informing the recipients the uses for which said funds could be expended.

Ms. Maura White  
September 4, 1980  
Page five

5. For all transfers made on October 13 and 30, 1978, for "general election day expenses," state the name of all candidates (both federal and state), by office sought, who were seeking election in those areas where GOVT or voter registration expenses were incurred.
  - A. 1 U. S. Senator, 4 Congressional seats, 100 candidates for the House of Delegates and 17 candidates for the State Senate, along with numerous county and local offices.
6. In addition to the "general election day expenses" incurred by the WVSDEC on November, 1976, and October 13 and 30, 1978, has the WVSDEC engaged in any other GOVT or voter registration activities? If the answer is yes, please explain the nature of the activity, the amounts expended on that activity, and the date the activity occurred.
  - A. No.
7. Explain the nature and purpose of the transfer of \$1,000 to the Kanawha County Democratic Executive Committee, a federally registered committee, on or about November 4, 1978?
  - A. The \$1,000.00 check made payable to the Kanawha County Democratic Executive Committee, a copy of which is attached hereto with Exhibit 2, bears the same disclaimer shown on the checks issued to all other county executive committees.

In addition to the information we have supplied here in response to your questions, I have read with interest the report prepared by you and David Branch which is titled "Notification of Reason to Believe Finding". One of the concerns raised in your report was the 106 transfers totalling \$40,900 made by the Committee in 1978 and 10 transfers totalling \$3,500 made by the Committee in 1976. I have attached for your perusal copies of all of those transfers, the purpose of said transfers being clearly indicated on the checks themselves demonstrating that when made to a county committee its purposes were clearly defined within your guidelines;

Ms. Maura White  
September 4, 1980  
Page six

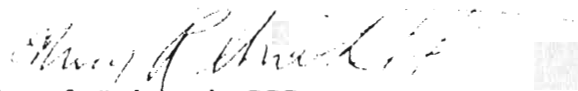
and when made to a candidate for state or local office within the guidelines of state election law which does not come under your jurisdiction.

Also please find, as per your stated concern, that while the Committee did transfer \$1100.00 to the Kanawha County Democratic Executive Committee, that \$100.00 of that transfer was returned to the State Committee in order that we would be in compliance with both the federal and state law regarding maximum campaign contributions.

Additionally, attached hereto and marked as Exhibit No. 3 is a letter, dated March 12, 1979, to the Committee from Robert J. Costa, Assistant Staff Director for the Audit Division of the Federal Election Commission, finding that the West Virginia State Democratic Telethon Committee was not a political committee as defined by section 431 and was, therefore, not subject to the jurisdiction of your Commission. It is our belief that the State Executive Committee is also not a committee within the meaning of sections 433 and 434 of the Act, and we would hope to conduct our affairs solely for the purpose of state-wide candidates in order to remain solely within the jurisdiction of the West Virginia Secretary of State and to avoid the necessity of filing the numerous forms required by your Commission which would be a great hardship on our Committee inasmuch as we have only one paid staff member and make a concerted effort not to involve ourselves in federal election campaigns.

We trust this response will adequately comply with your request for information, and if further documentation is necessary, please direct the same to me.

Yours sincerely,



Edward Rebrook III  
Counsel to the West Virginia  
State Democratic Executive Committee

ERIII:fb

Attachments



# Checklist: November 2

CLIP TODAY!  
OTE TUESDAY!

RECEIVED

80 SEP 11 12:02

1424 - CHARLESTON, WEST VIRGINIA 25325

October 21, 1976

GOVERNOR

☒ JOHN D.  
**ROCKEFELLER, IV**

SECRETARY OF  
STATE

☒ A. JAMES  
**MANCHIN**

AUDITOR

☒ GLEN B.  
**GAINER, JR.**

TREASURER

☒ LARRIE  
**BAILEY**

ATTORNEY  
GENERAL

☒ CHAUNCEY  
**BROWNING**

COMMISSIONER  
OF AGRICULTURE

☒ GUS R.  
**DOUGLASS**

SUPREME COURT  
OF APPEALS

☒ DARRELL V.  
**McGRAW, JR.**

☒ THOMAS B.  
**MILLER**

☒ SAM R.  
**HARSHBARGER**

littee

er ad on behalf  
state newspapers  
once in weeklies)  
2nd"

\$2,730.10

6

placement

204.75

Cost of mechanicals for newspapers

127.50

TOTAL DUE

\$3,062.35

52.67

3,115.02

EXHIBIT NO. 1



## 1292

November 9

76      69.376  
515

Three Thousand One Hundred Fifteen and 02/100-----

3,115.02

**THE NATIONAL BANK  
of COMMERCE  
CHARLESTON, W. VA. 26322**

**NOT NEGOTIABLE**

1:05 15 03 76: 01 6440 01

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT. NO.	AMOUNT
11/9/76	Canfield, Miller & Associates P.O. Box 1424, Charleston, W.Va. - Political Ed "Checklist" in dailies and weeklies	\$3,115.02		

EMPLOYEE

[illegible]

1605

October 13 1978

319

DOLLARS \$ 200.00

NOT NEGOTIABLE

140519-0376: 01 6440 01201

DELUXE - FORM VVC-3 V-

RECEIVED

\$200.00

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1608

October 13 1978

Two Hundred and 90/100

DOLLARS \$ 200.00

The Treasurer, Doddridge County Democratic Executive Committee

NON NEGOTIABLE

NOT NEGOTIABLE

⑆0514⑉0376⑆ 01 6440 0⑈01

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/13/78

0.00

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1609

October 13 1978

Two Hundred and 00/100

DOLLARS \$ 200.00

The Treasurer, Gilmer County Democratic Executive Committee

NON NEGOTIABLE

NOT NEGOTIABLE

⑆0514⑉0376⑆ 01 6440 0⑈01

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/13/78

0.00

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

W. VA. DEMOCRATIC EXECUTIVE COMMITTEE  
2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1610

October 13 1978

519

Two Hundred and 00/100 DOLLARS \$200.00

The Treasurer,  
Grant County Democratic Executive Committee

*James Bailey*  
NOT NEGOTIABLE

⑆0514⑆0376⑆ 01 6440 0001

W. VA. DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

10/13/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

1.00

W. VA. DEMOCRATIC EXECUTIVE COMMITTEE  
2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1611

October 13 1978

519

Two Hundred and 00/100 DOLLARS \$200.00

The Treasurer,  
Hardy County Democratic Executive Committee

*James Bailey*  
NOT NEGOTIABLE

⑆0514⑆0376⑆ 01 6440 0001

W. VA. DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

200.00

10/13/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

3 1 0 1 0 3 1 1 7 1 7

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1612

October 13 19 78

22-372  
519

Two Hundred and 00/100 \_\_\_\_\_ DOLLARS \$ 200.00

The Treasurer,  
Monroe County Democratic Executive Committee

CONFIDENTIAL

00514-00378: 01 6440 0001

*Jessie B. Bailey*  
NEGOTIABLE

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

	DESCRIPTION	AMOUNT
		00.00
10/13/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1612

October 13 19 78

22-372  
519

Two Hundred and 00/100 \_\_\_\_\_ DOLLARS \$ 200.00

The Treasurer,  
Morgan County Democratic Executive Committee

CONFIDENTIAL

00514-00378: 01 6440 0001

*Jessie B. Bailey*  
NEGOTIABLE

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

	DESCRIPTION	AMOUNT
		\$200.00
10/13/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	

3 1 7 1 1 7 1 3  
W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1614

October 13, 1978

92-201  
519

Two Hundred and 00/100

DOLLARS \$ 200.00

TO  
Treasurer,  
Pendleton County Democratic Executive Committee

NATIONAL

00514-0376: 01 6440 0001

*Janet Bailey*  
NOT NEGOTIABLE

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/13/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$200.00

DATE	DESCRIPTION	TOTAL PAID	TOTAL RECEIVED	NET	STATE TAX	FEDERAL TAX

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1615

October 13, 1978

Two Hundred and 00/100

DOLLARS \$ 200.00

The Treasurer,  
Pleasants County Democratic Executive Committee

NATIONAL

00514-0376: 01 6440 0001

*Janet Bailey*  
NOT NEGOTIABLE

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/13/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$200.00

DATE	DESCRIPTION	TOTAL PAID	TOTAL RECEIVED	NET	STATE TAX	FEDERAL TAX

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2155 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1616

October 13 1978

10-13-78  
319

Two Hundred and 00/100 DOLLARS \$200.00

The Treasurer,  
Pocahontas County Democratic Executive Committee

NEGOTIABLE

20514-03761 01 6440 0001

*James Bailey*  
NEGOTIABLE

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

200.00

10/13/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2155 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1617

October 13 1978

10-13-78  
319

Two Hundred and 00/100 DOLLARS \$200.00

The Treasurer,  
Ritchie County Democratic Executive Committee

NEGOTIABLE

20514-03761 01 6440 0001

*James Bailey*  
NEGOTIABLE

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

200.00

10/13/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.



1618

0-0000  
917

**DOLLARS \$ 200.00**

NOT NEGOTIABLE  
0001

40514-0376: 01 5440 0701

DELUXE - FORM WVC-3 V-0

1610

0-523

DOLLARS \$ 200.00

James Bailey  
NOT NEGOTIABLE  
0001

20519-0376: 01 6440 0602

DELUXE - FORM WVC-3 V-1

DATE		DESCRIPTION	AMOUNT
10/13/78		For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	30.00



W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2166 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1620

October 13 1978

10-178  
319

Two Hundred and 00/100 \_\_\_\_\_ DOLLARS \$ 200.00

The Treasurer,  
Tyler County Democratic Executive Committee

CONFIDENTIAL

00514-03761 01 5440 0001

*Jacobs Bailey*  
NOT NEGOTIABLE

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/13/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

200.00

1622

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2166 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

October 13 1978

10-178  
319

Two Hundred and 00/100 \_\_\_\_\_ DOLLARS \$ 200.00

The Treasurer,  
Upshur County Democratic Executive Committee

CONFIDENTIAL

00514-03761 01 5440 0001

*Jacobs Bailey*  
NOT NEGOTIABLE

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/13/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

200.00

1623

October 13 1978

2-222

Two Hundred and 00/100-----DOLLARS \$ 200.00

The Treasurer,  
Wirt County Democratic Executive Committee

# CONFIDENTIAL

20514003761: 01 6440 0001

James Bailey  
NOT NEGOTIABLE  
00001

DELUXE - FORM WVC-3 Y-0

DATE	DESCRIPTION	AMOUNT	BALANCE
10/13/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	200.00	

1624

October 13 1978

Two Hundred and 00/100 \_\_\_\_\_ DOLLARS \$ 200.00

The Treasurer,  
Calhoun County Democratic Executive Committee

## CONCLUSIONS

00519-0376: 01 64.0 0002

NOT NEGOTIABLE  
0001

DELUXE - FORM WVD-3 V-4

DESCRIPTION	AMOUNT
<p>10/13/78</p> <p>For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.</p>	<p>\$200.00</p>

1625

October 13 1978

419

Three Hundred and 00/100

DOLLARS \$ 300.00

  
 NOT NEGOTIABLE  
 0000

## CONCLUSIONS

00514-03760 01 6440 0601

DELUXE - FORM WVC-3 V-4

DATE	DESCRIPTION	AMOUNT
10/13/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$300.00

1020

October 13 1978

92-578  
910

Three Hundred and 00/100

DOLLARS \$ 300.00

0001

**THE UNIVERSITY OF CHICAGO**

05140037E: 01 6440 0001

DELUXE - FORM WVC-3 V-6

DATE	DESCRIPTION	AMOUNT
10/13/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	300.00

1556

22-2  
519

7

*James Bailey*  
NOT NEGOTIABLE  
000001

00544003760 01 64400000

DELUXE - FORM WVC-3 V-6

1628

2003

—

NOT NEGOTIABLE

0519-0376: 01 5440 0101

DELUXE - FORM WVC-3 V-0

DATE	DESCRIPTION	A.MOUNT
		00.00
10/13/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamph- lets and other printed matter and in posting and distributing signs, banners and other advertisements.	

EXECUTIVE COMMITTEE  
KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1629

October 13 1978

519

Three Hundred and 00/100 DOLLARS \$ 300.00

The Treasurer,  
Brooke County Democratic Executive Committee

*James Bailey*  
NOT NEGOTIABLE

⑆0514⑉0376⑆ 01 6440 0⑆01

WEST VIRGINIA DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DATE	DESCRIPTION	AMOUNT
10/13/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	100.00

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1630

October 13 1978

519

Three Hundred and 00/100 DOLLARS \$ 300.00

The Treasurer,  
Greenbrier County Democratic Executive Committee

*James Bailey*  
NOT NEGOTIABLE

⑆0514⑉0376⑆ 01 6440 0⑆01

WEST VIRGINIA DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DATE	DESCRIPTION	AMOUNT
10/13/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$300.00

DATE	NAME	ADDRESS	TELEPHONE	TELETYPE	TELEFAX	TELEVISION	INTERNET	EMAIL	OTHER
1998	JOHN DOE	1234 MAIN ST	555-1234						
1999	JANE DOE	5678 MAIN ST	555-5678						
2000	JOHN DOE	9012 MAIN ST	555-9012						
2001	JANE DOE	3456 MAIN ST	555-3456						
2002	JOHN DOE	7890 MAIN ST	555-7890						
2003	JANE DOE	2345 MAIN ST	555-2345						
2004	JOHN DOE	6789 MAIN ST	555-6789						
2005	JANE DOE	1011 MAIN ST	555-1011						
2006	JOHN DOE	4567 MAIN ST	555-4567						
2007	JANE DOE	8901 MAIN ST	555-8901						
2008	JOHN DOE	2101 MAIN ST	555-2101						
2009	JANE DOE	5432 MAIN ST	555-5432						
2010	JOHN DOE	9876 MAIN ST	555-9876						
2011	JANE DOE	3210 MAIN ST	555-3210						
2012	JOHN DOE	6543 MAIN ST	555-6543						
2013	JANE DOE	0987 MAIN ST	555-0987						
2014	JOHN DOE	4321 MAIN ST	555-4321						
2015	JANE DOE	7654 MAIN ST	555-7654						
2016	JOHN DOE	1098 MAIN ST	555-1098						
2017	JANE DOE	5210 MAIN ST	555-5210						
2018	JOHN DOE	8432 MAIN ST	555-8432						
2019	JANE DOE	2654 MAIN ST	555-2654						
2020	JOHN DOE	5876 MAIN ST	555-5876						
2021	JANE DOE	9012 MAIN ST	555-9012						
2022	JOHN DOE	3210 MAIN ST	555-3210						
2023	JANE DOE	6432 MAIN ST	555-6432						
2024	JOHN DOE	9654 MAIN ST	555-9654						
2025	JANE DOE	2876 MAIN ST	555-2876						
2026	JOHN DOE	5098 MAIN ST	555-5098						
2027	JANE DOE	8210 MAIN ST	555-8210						
2028	JOHN DOE	1432 MAIN ST	555-1432						
2029	JANE DOE	4654 MAIN ST	555-4654						
2030	JOHN DOE	7876 MAIN ST	555-7876						
2031	JANE DOE	1098 MAIN ST	555-1098						
2032	JOHN DOE	4210 MAIN ST	555-4210						
2033	JANE DOE	7432 MAIN ST	555-7432						
2034	JOHN DOE	0654 MAIN ST	555-0654						
2035	JANE DOE	3876 MAIN ST	555-3876						
2036	JOHN DOE	6098 MAIN ST	555-6098						
2037	JANE DOE	9210 MAIN ST	555-9210						
2038	JOHN DOE	2432 MAIN ST	555-2432						
2039	JANE DOE	5654 MAIN ST	555-5654						
2040	JOHN DOE	8876 MAIN ST	555-8876						
2041	JANE DOE	1098 MAIN ST	555-1098						
2042	JOHN DOE	4210 MAIN ST	555-4210						
2043	JANE DOE	7432 MAIN ST	555-7432						
2044	JOHN DOE	0654 MAIN ST	555-0654						
2045	JANE DOE	3876 MAIN ST	555-3876						
2046	JOHN DOE	6098 MAIN ST	555-6098						

1633

October 13 1978

~~SECRET~~  
519

Three Hundred and 00/100-

**TWO DOLLARS \$ 300.00**

NOT NEGOTIABLE

05 14 0376: 01 6440/0501

DELUXE - FORM WVC-3 V-6

DATE		DESCRIPTION	AMOUNT	
10/13/78		For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$300.00	

DATE		AMOUNT	OVERSHE	EXCESS	REMARKS	STATE	TAX

1634

October 13 1978

0-500  
218

'Three Hundred and 00/100-

**DOLLARS \$ 300.00**

James E. Bailey  
NEGOTIABLE  
0001

0514003761 01 2440/0001

LUXE - FORM WVC-3 V-6

10/13/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

300.00



1035

October 13 1978

CO-576  
519

~~Three Hundred and 00/100~~ DOLLARS \$ 300.00

The Treasurer,  
Lewis County Democratic Executive Committee

CONFIDENTIAL

00549-03762 01 6440 0001

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DATE	DESCRIPTION	AMOUNT
10/13/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$300.00

1636

...IVE COMMITTEE  
...LVD., E.  
... W. VA. 25311

October 13 1978

99-376  
519

Three Hundred and 00/100 \_\_\_\_\_ DOLLARS \$ 300.00

The Treasurer,  
Lincoln County Democratic Executive Committee

## CONSTITUTIONAL

10514-0376: 01 6440 0601

W. VA. STATE DEMOCRATIC  
ENG. DIVISION OFFICE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-4

DATE	DESCRIPTION	AMOUNT	REMARKS
10/13/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$300.00	



For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1639

October 13 1978

62-573  
510

Three Hundred and 00/100

DOLLARS \$300.00

The Treasurer,  
Mineral County Democratic Executive Committee

THE NATIONAL

00514-0376: 01 6440 0001

*Jacqueline Bailey*  
NEGOTIABLE

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION		AMOUNT
10/13/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	300.00
TAXES AND OTHER		
TAX		

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1640

October 13 1978

62-573  
510

Three Hundred and 00/100

DOLLARS \$300.00

The Treasurer,  
Nicholas County Democratic Executive Committee

THE NATIONAL

00514-0376: 01 6440 0001

*Jacqueline Bailey*  
NEGOTIABLE

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION				AMOUNT	
For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.				\$300.00	

1641

October 13 1978

0-271  
519

Three Hundred and 00/100

DOLLARS \$ 300.00

The Treasurer,  
Preston County Democratic Executive Committee

# CONFIDENTIAL

20514-03761 01 2440 0101

NOT NEGOTIABLE  
DPOI

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-4

DATE	DESCRIPTION	AMOUNT
10/13/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$300.00

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2106 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1642

October 13 1978

0.070  
519

Three Hundred and 00/100

**TWO DOLLARS \$ 300.00**

The Treasurer,  
Putnam County Democratic Executive Committee

## NATURAL

40524-0376: 04 6440 0401

James Bailey

W. VA. STATE DEMOCRATIC  
ELECTION COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 44

[illegible]

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1643

October 13 1978

02-378  
519

Three Hundred and 00/100

DOLLARS \$300.00

The Treasurer,  
Randolph County Democratic Executive Committee

INTERNATIONAL

⑆0514⑉0376⑆ 01 6440 0⑈01

*Jewell Bailey*  
NEGOTIABLE

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

\$300.00

10/13/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

DATE	AMOUNT	EXEMPT AND OTHER	EARNINGS	ACCUMULATED TAX	WITHHOLDING TAX	INDEBT TAX	INDEBT TAX

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1644

October 13 1978

02-378  
519

Three Hundred and 00/100

DOLLARS \$300.00

The Treasurer,  
Summers County Democratic Executive Committee

INTERNATIONAL

⑆0514⑉0376⑆ 01 6440 0⑈01

*Jewell Bailey*  
NEGOTIABLE

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

\$300.00

10/13/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

DATE	AMOUNT	EXEMPT AND OTHER	EARNINGS	ACCUMULATED TAX	WITHHOLDING TAX	INDEBT TAX	INDEBT TAX

W. A. STEVENS COUNTY DEMOCRATIC EXECUTIVE COMMITTEE  
2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1645

October 13 1978

10-211  
519

Three Hundred and 00/100 DOLLARS \$300.00

The Treasurer,  
Taylor County Democratic Executive Committee

NON NEGOTIABLE

00514-00378: 01 6440 0001

*James Bailey*  
NOT NEGOTIABLE

WAYNE COUNTY DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/13/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

300.00

DATE	DESCRIPTION	AMOUNT	TOTAL	STATE	FEDERAL	STATE	FEDERAL

W. A. STEVENS COUNTY DEMOCRATIC EXECUTIVE COMMITTEE  
2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1646

October 13 1978

10-211  
519

Three Hundred and 00/100 DOLLARS \$300.00

The Treasurer,  
Wayne County Democratic Executive Committee

NON NEGOTIABLE

00514-00378: 01 6440 0001

*James Bailey*  
NOT NEGOTIABLE

WAYNE COUNTY DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/13/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

300.00

DATE	DESCRIPTION	AMOUNT	TOTAL	STATE	FEDERAL	STATE	FEDERAL

1647

October 13 1978

22-26  
519

Three Hundred and 00/100 \_\_\_\_\_ DOLLARS \$300.00

James B. Bailey  
NEGOTIABLE

150524-037E: 02 64100001

DELUXE - FORM WVC-3 W-1

DATE	DESCRIPTION	AMOUNT
7/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	1300.00

1648

October 13 1978

02-310  
510

Three Hundred and 00/100 \_\_\_\_\_ DOLLARS \$ 300.00

NOT NEGOTIABLE

051400376: 01 641,0/0102

DELUXE - FORM WVC-3 V-6

DESCRIPTION	AMOUNT
	300.00
10/13/78 For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	



1649

October 13 1978

2002  
919

Three Hundred and 00/100 \_\_\_\_\_ DOLLARS \$ 300.00

NOT NEGOTIABLE

10514-0376: 01 6440 0301

DELUXE - FORM WVC-3 V-6

DATE	DESCRIPTION	AMOUNT
		\$300.00
10/13/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	

1050

October 13 78

2-10-19

Five Hundred and 00/100 \_\_\_\_\_ DOLLARS \$ 500.00

James Bailey

00519:0376: 01 64400:01

DELUXE - FORM WVC-3 W-4

DATE	DESCRIPTION	AMOUNT
10/13/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	500.00

3 1 0 1 3 1 1 7 3 3  
W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2106 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1651

October 13 1978

50-1073  
319

Five Hundred and 00/100 DOLLARS \$ 500.00

The Treasurer,  
Fayette County Democratic Executive Committee

INTERNATIONAL

0051400376: 01 6440 0001

Jerrold Bailey  
NEGOTIABLE

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVG-3 V-6

DESCRIPTION

AMOUNT

\$500.00

10/13/78 For use solely and exclusively in the interest  
of the Democratic Ticket, in conveying voters  
to and from the polls, examining and checking  
lists of registered voters, distributing pamph-  
lets and other printed matter and in posting  
and distributing signs, banners and other  
advertisements.

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2106 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1652

October 13 1978

50-1073  
319

Five Hundred and 00/100 DOLLARS \$ 500.00

The Treasurer,  
Harrison County Democratic Executive Committee

INTERNATIONAL

0051400376: 01 6440 0001

Jerrold Bailey  
NEGOTIABLE

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVG-3 V-6

DESCRIPTION

AMOUNT

500.00

10/13/78 For use solely and exclusively in the interest  
of the Democratic Ticket, in conveying voters  
to and from the polls, examining and checking  
lists of registered voters, distributing pamph-  
lets and other printed matter and in posting  
and distributing signs, banners and other  
advertisements.



W. VA. DEMOCRATIC EXECUTIVE COMMITTEE  
2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1653

October 13 1978

10/13/78

Eleven Hundred and 00/100 \_\_\_\_\_ DOLLARS \$1100.00

The Treasurer,  
Kanawha County Democratic Executive Committee

*James Bailey*  
NOT NEGOTIABLE

⑆0514⑉0376⑆ 01 6440 0⑉01

W. VA. DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DATE	DESCRIPTION	AMOUNT
10/13/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	100.00

*\$1,000.00 error  
refunded 10/13/78  
the deposited  
in appt. acct.  
J.B.*

W. VA. DEMOCRATIC EXECUTIVE COMMITTEE  
2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1654

October 13 1978

10/13/78

Five Hundred and 00/100 \_\_\_\_\_ DOLLARS \$500.00

The Treasurer,  
Marion County Democratic Executive Committee

*James Bailey*  
NOT NEGOTIABLE

⑆0514⑉0376⑆ 01 6440 0⑉01

W. VA. DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DATE	DESCRIPTION	AMOUNT
10/13/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$500.00

1654

October 13 1978

5-7-22

Five Hundred and 00/100 \_\_\_\_\_ DOLLARS \$ 500.00

NOT NEGOTIABLE

00514-0372: 01 6410 0701

DELUXE - FORM WVC-3 WVC-3

DATE	DESCRIPTION	AMOUNT
10/13/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$500.00

1050

October 13 1978

2007

Five Hundred and 00/100 \_\_\_\_\_ DOLLARS \$ 500.00

1003  
Jesse Bailey  
NOT NEGOTIABLE  
00001

00524-0372: 01 61.40 04201

DELUXE - FORM WVC-3 V-4

DESCRIPTION	AMOUNT
10/13/78	
<p>For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.</p>	<p>\$500.00</p>

W. A. DEMOCRATIC AND EXECUTIVE COMMITTEE  
2106 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1661

October 13 1978

Five Hundred and 00/100 DOLLARS \$ 500.00

The Treasurer,  
Ohio County Democratic Executive Committee

NEGOTIABLE

⑆0514⑉0376⑆ 01 6440 0⑈01

W. A. DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION		AMOUNT
10/13/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$500.00
TAXES AND OTHER		
TAX		
FEDERAL TAX		
STATE TAX		
LOCAL TAX		
TOTAL TAX		

W. A. DEMOCRATIC AND EXECUTIVE COMMITTEE  
2106 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1657

October 13 1978

Five Hundred and 00/100 DOLLARS \$ 500.00

The Treasurer,  
Raleigh County Democratic Executive Committee

NEGOTIABLE

⑆0514⑉0376⑆ 01 6440 0⑈01

W. A. DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION		AMOUNT
10/13/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$500.00
TAXES AND OTHER		
TAX		
FEDERAL TAX		
STATE TAX		
LOCAL TAX		
TOTAL TAX		

1650

20. 5. 1950

**DOLLARS \$ 500.00**

NOT NEGOTIABLE

00524-0376: 01 6440 0001

DELUXE - FORM WVC-3 W4

1050

October 13 1978

Dollars: 500.00

NOT NEGOTIABLE

060914-037E: 01 6440 0W01

DELUXE - FORM WVC-3 V-6

DESCRIPTION	AMOUNT
10/13/78	\$500.00
For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	

DATE	DESCRIPTION	TOTAL	REMARKS
1960	...	...	...
1961	...	...	...
1962	...	...	...
1963	...	...	...
1964	...	...	...
1965	...	...	...
1966	...	...	...
1967	...	...	...
1968	...	...	...
1969	...	...	...
1970	...	...	...
1971	...	...	...
1972	...	...	...
1973	...	...	...
1974	...	...	...
1975	...	...	...
1976	...	...	...
1977	...	...	...
1978	...	...	...
1979	...	...	...
1980	...	...	...
1981	...	...	...
1982	...	...	...
1983	...	...	...
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1986	...	...	...
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1988	...	...	...
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2005	...	...	...
2006	...	...	...
2007	...	...	...
2008	...	...	...
2009	...	...	...
2010	...	...	...
2011	...	...	...
2012	...	...	...
2013	...	...	...
2014	...	...	...
2015	...	...	...
2016	...	...	...
2017	...	...	...
2018	...	...	...
2019	...	...	...
2020	...	...	...
2021	...	...	...
2022	...	...	...
2023	...	...	...
2024	...	...	...
2025	...	...	...
2026	...	...	...
2027	...	...	...
2028	...	...	...
2029	...	...	...
2030	...	...	...
2031	...	...	...
2032	...	...	...
2033	...	...	...
2034	...	...	...
2035	...	...	...
2036	...	...	...
2037	...	...	...
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2045	...	...	...
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2052	...	...	...
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2056	...	...	...
2057	...	...	...
2058	...	...	...
2059	...	...	...
2060	...	...	...
2061	...	...	...
2062	...	...	...
2063	...	...	...
2064	...	...	...
2065	...	...	...
2066	...	...	...
2067	...	...	...
2068	...	...	...
2069	...	...	...
2070	...	...	...
2071	...	...	...
2072	...	...	...
2073	...	...	...
2074	...	...	...
2075	...	...	...

3 1 7 0 0 2 1 1 7 3 2  
W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1665

October 30 1978

519

Three Hundred and 00/100 \_\_\_\_\_ DOLLARS \$300.00

The Treasurer, Calhoun County Democratic Executive Committee

NEGOTIABLE

80514-03760 01 6440 0001

*James Bailey*

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DATE	DESCRIPTION	AMOUNT
10/30/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$300.00

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1666

October 30 1978

519

Three Hundred and 00/100 \_\_\_\_\_ DOLLARS \$300.00

The Treasurer,  
Gilmer County Democratic Executive Committee

NEGOTIABLE

80514-03760 01 6440 0001

*James Bailey*

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DATE	DESCRIPTION	AMOUNT
10/30/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$300.00



2 1 2 1 0 1 1 7 5 3  
EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

October 78

10-31-78

Three Hundred and 00/100

DOLLARS \$300.00

The Treasurer,  
Hardy/Democratic Executive Committee  
County

THE NATIONAL

⑆0514⑉0376⑆ 01 6440 0001

*James L. Bailey*  
NOT NEGOTIABLE

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

9/30/78

For use solely and exclusively in the interest of, the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$300.00

STATE  
TAX

1668  
EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

October 30 78

10-31-78

Three Hundred and 00/100

DOLLARS \$300.00

The Treasurer,  
Monroe County Democratic Executive Committee

THE NATIONAL

⑆0514⑉0376⑆ 01 6440 0001

*James L. Bailey*  
NOT NEGOTIABLE

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

9/30/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$300.00

STATE  
TAX

WILL BE PAID BY OTHER

TAX

TO THE TAXPAYER'S TAX

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

October 30 1978

1000  
319

Three Hundred and 00/100 DOLLARS \$300.00

The Treasurer,  
Morgan County Democratic Executive Committee

*James Bailey*  
NEGOTIABLE

⑈0514⑈0376⑈ 01 6440 0001

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

10/30/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$300.00

D E D U C T I O N S						T O T A L	
STATE	FEDERAL	CITY	COUNTY	SALES TAX	INCOME TAX		

1070

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

October 30 1978

1000  
319

Three Hundred and 00/100 DOLLARS \$300.00

The Treasurer  
Pendleton County Democratic Executive Committee

*James Bailey*  
NEGOTIABLE

⑈0514⑈0376⑈ 01 6440 0001

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

10/30/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$300.00

D E D U C T I O N S						T O T A L	
STATE	FEDERAL	CITY	COUNTY	SALES TAX	INCOME TAX		



W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

October 1978

10/28/78

Three Hundred and 00/100 DOLLARS \$ 300.00

The Treasurer,  
Pleasants County Democratic Executive Committee

RECEIVED

20514-03761 01 6440 0001

NOT NEGOTIABLE

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/30/78 For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$300.00

DATE	DESCRIPTION	AMOUNT	TOTAL	REMARKS

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

10/28/78

October 30 1978

Three Hundred and 00/100 DOLLARS \$ 300.00

The Treasurer,  
Pocahontas County Democratic Executive Committee

RECEIVED

20514-03761 01 6440 0001

NOT NEGOTIABLE

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/30/78 For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$300.00

DATE	DESCRIPTION	AMOUNT	TOTAL	REMARKS

250

NOT NEGOTIABLE  
J. A. Bailey

00514-0376: 01 6440 0002

DELUXE - FORM WVC-3 WVC-3

3251-5 317-593

2002:47

155

**\$300.00**

[illegible]

1674

October 30 1978

The Treasurer,  
Rome County Democratic Executive Committee

CONFIDENTIAL

00514-03761 01 6440 0001

NOT NEGOTIABLE  
JENNIFER L. LINDLEY

DELUXE - FORM WVC-3 V-1

06/07/2011 11:21:22

333-335

20/30/75

**\$300.00**

[illegible]

W. VA. DEMOCRATIC EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1675

October 20 1978

1675

Three Hundred and 00/100

DOLLARS \$300.00

The Treasurer,  
Ficker County Democratic Executive Committee

00514-0372: 01 6440 0001

*Janet Negotiable*

W. VA. DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

10/30/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$300.00

1676

W. VA. DEMOCRATIC EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

October 30 1978

Three Hundred and 00/100

DOLLARS \$300.00

The Treasurer,  
Wirt County Democratic Executive Committee

00514-0372: 01 6440 0001

*Janet Negotiable*

W. VA. DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

10/31/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$300.00

October 30, 1978

Three Hundred and 00/100 \_\_\_\_\_ DOLLARS \$ 300.00

NOT NEGOTIABLE  
01002

05440376: 01 6440/0002

DELUXE - FORM WVC-3 V-6

DATE	DESCRIPTION	AMOUNT
12/30/70	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$300.00

1677

October 30, 78

~~Three Hundred and 00/100~~ DOLLARS \$~~300.00~~

NOT NEGOTIABLE

120517-0376: 01 6410 0101

DELUXE - FORM WVC-3 V-2

[illegible]

October 20, 1978

Three Hundred and 00/100 \_\_\_\_\_ DOLLARS \$300.00

NOT NEGOTIABLE

20514-0376: 01 6440/04202

DELUXE - FORM WVC-3 4-6

1975: 103-110.

APPENDIX

1000

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

**\$300.00**

1660

October 30 78

Three Hundred and 00/100 \_\_\_\_\_ DOLLARS \$ 300.00

NOT NEGOTIABLE  
0001

10514-0376: 02 6440 0001

DELUXE - FORM WVC-3 V-8

REVISED 1990

## APPENDIX

10/30/75

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

**\$300.00**

2 0 7 7 1 3 14 3

October 30 1978

Three Hundred and 00/100 \_\_\_\_\_ DOLLARS \$300.00

NOT NEGOTIABLE  
JAN 10 1961

180324-037211 01 6440/0401

DELUXE - FORM WVC-2 Y-6

DATE		DESCRIPTION	AMOUNT
10/30/70		For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$300.00

				DEDUCTIONS			
TOTAL	STATE	FEDERAL	TOTAL	STATE	FEDERAL	TOTAL	TOTAL
EARNINGS	TAX	TAX	EARNINGS	TAX	TAX	EARNINGS	EARNINGS

1002

October 30 1978

Five Hundred and 00/100 \_\_\_\_\_ DOLLARS \$500.00

James C. Bailey

00514-0376: 01 6413 0101

DELUXE • FORM VWC-3 V-4

DATE	DESCRIPTION	AMOUNT
10/30/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$500.00



LEWIS COUNTY DEMOCRATIC EXECUTIVE COMMITTEE  
2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

October 30, 1978

Five Hundred and 00/100 \_\_\_\_\_ DOLLARS \$500.00

The Treasurer,  
Lewis County Democratic Executive Committee

00514-003761 01 6440 0001

LEWIS COUNTY DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/30/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$500.00

TOTAL

DATE

TIME

BY

FOR

TO

BY

FOR

TO

BY

FOR

TO

LEWIS COUNTY DEMOCRATIC EXECUTIVE COMMITTEE  
2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

October 30, 1978

Five Hundred and 00XX00 \_\_\_\_\_ DOLLARS \$500.00

The Treasurer,  
Randolph County Democratic Executive Committee

00514-003761 01 6440 0001

LEWIS COUNTY DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/30/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$500.00

TOTAL

DATE

TIME

BY

FOR

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BY

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BY

FOR



2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

October 30 1978

Five Hundred and 00/100 DOLLARS \$500.00

The Treasurer,  
Summers County Democratic Executive Committee

NEGOTIABLE

40514-0376: 01 6440 0001

DEMOCRATIC  
COUNTY EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/30/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$500.00

DATE

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W. VA. DEMOCRATIC EXECUTIVE COMMITTEE  
2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1686

October 30 1978

Five Hundred and 00/100 DOLLARS \$500.00

The Treasurer,  
Taylor County Democratic Executive Committee

NEGOTIABLE

40514-0376: 01 6440 0001

DEMOCRATIC  
COUNTY EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/30/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$500.00

DATE

TAX

TAX

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TAX

TAX

Oct

78

510

Five Hundred and 00/100

DOLLARS \$500.00

The Treasurer,  
Cabell County Democratic Executive Committee

NON NEGOTIABLE

00514-00376: 01 6440 0001

*James Bailey*  
NOT NEGOTIABLE

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DATE	DESCRIPTION	AMOUNT
10/30/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$500.00

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1688

October 30 1978

510

Five Hundred and 00/100

DOLLARS \$500.00

The Treasurer,  
Fayette County Democratic Executive Committee

NON NEGOTIABLE

00514-00376: 01 6440 0001

*James Bailey*  
NOT NEGOTIABLE

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DATE	DESCRIPTION	AMOUNT
10/30/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$500.00

October 30, 78

The Treasurer,  
Harrison County Democratic Executive Committee

10. 11. 2009

00514-03761 01 6440 0001

DELUXE - FORM WVC-3 V-1

DATE	DESCRIPTION	AMOUNT
10/22/70	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$500.00
		<div data-bbox="1011 1081 1188 1100"> <div data-bbox="1011 1081 1188 1100">TOTAL</div> <div data-bbox="1011 1100 1188 1118">TAX</div> </div>

1690

October 30 1978

Five Hundred and 00/100 \_\_\_\_\_ DOLLARS \$500.00

The Treasurer,  
Marion County Democratic Executive Committee

# THE NATIONAL

130527-0376: 01 6440 0801

DELUXE - FORM WVC-3 V-6

DATE	DESCRIPTION	AMOUNT
10/30/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$500.00

W. VA. DEMOCRATIC EXECUTIVE COMMITTEE  
2106 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1691

October 30 1978

Five Hundred and 00/100 DOLLARS \$500.00

The Treasurer,  
Mercer County Democratic Executive Committee

RECEIVED

00519-0376: 01 6440 0P01

*Janet Bailey*  
NEGOTIABLE

W. VA. DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/30/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$500.00

1692

W. VA. DEMOCRATIC EXECUTIVE COMMITTEE  
2106 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

October 30 1978

Five Hundred and 00/100 DOLLARS \$500.00

The Treasurer,  
Monongalia County Democratic Executive Committee

RECEIVED

00519-0376: 01 6440 0P01

*Janet Bailey*  
NEGOTIABLE

W. VA. DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/30/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters, to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$500.00

RALEIGH COUNTY DEMOCRATIC EXECUTIVE COMMITTEE  
2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1000

October 30 1978

Five Hundred and 00/100

DOLLARS \$500.00

The Treasurer,  
Raleigh County Democratic Executive Committee

⑈0514⑈0376⑈ 01 6440 0001

RALEIGH COUNTY DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/30/78

For use solely and exclusively in the interest  
of the Democratic Ticket, in conveying voters,  
to and from the polls, examining and checking  
lists of registered voters, distributing pamph-  
lets and other printed matter and in posting  
and distributing signs, banners and other  
advertisements.

\$500.00

FEDERAL TAX		STATE TAX		TOTAL TAX		TOTAL	

WOOD COUNTY DEMOCRATIC EXECUTIVE COMMITTEE  
2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1094

October 30 1978

Five Hundred and 00/100

DOLLARS \$500.00

The Treasurer,  
Wood County Democratic Executive Committee

⑈0514⑈0376⑈ 01 6440 0001

WOOD COUNTY DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/30/78

For use solely and exclusively in the interest  
of the Democratic Ticket, in conveying voters  
to and from the polls, examining and checking  
lists of registered voters, distributing pamph-  
lets, and other printed matter and in posting  
and distributing signs, banners and other  
advertisements.

\$500.00

FEDERAL TAX		STATE TAX		TOTAL TAX		TOTAL	

LOGAN COUNTY DEMOCRATIC EXECUTIVE COMMITTEE  
2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

October 30, 1978

Five Hundred and 00/100 \_\_\_\_\_ DOLLARS \$500.00

The Treasurer,  
Logan County Democratic Executive Committee

00514-0376: 01 6440 0001

LOGAN COUNTY DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/30/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$500.00

DATE	DESCRIPTION	AMOUNT	TOTAL RECEIPTS	STATE INCOME TAX

1000

VA. 111 DEMOCRATIC EXECUTIVE COMMITTEE  
2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

October 30, 1978

Five Hundred and 00/100 \_\_\_\_\_ DOLLARS \$500.00

The Treasurer,  
McDowell County Democratic Executive Committee

00514-0376: 01 6440 0001

MCDOWELL COUNTY DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/30/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$500.00

DATE	DESCRIPTION	AMOUNT	TOTAL RECEIPTS	STATE INCOME TAX

W. VA. DEMOCRATIC EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1097

October 30 1978

315

Five Hundred and 00/100 DOLLARS \$500.00

The Treasurer,  
Mingo County Democratic Executive Committee

*Jennell Bailey*  
NOT NEGOTIABLE

⑆0514⑉0376⑆ 01 6440 0001

W. VA. DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/30/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$500.00

RECEIVED  
DATE  
INITIALS

W. VA. DEMOCRATIC EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1698

October 30 1978

315

Five Hundred and 00/100 DOLLARS \$500.00

The Treasurer,  
Ohio County Democratic Executive Committee

*Jennell Bailey*  
NOT NEGOTIABLE

⑆0514⑉0376⑆ 01 6440 0001

W. VA. DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/30/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$500.00

RECEIVED  
DATE  
INITIALS



BOONE COUNTY DEMOCRATIC EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

October 30, 1978

10-31  
515

Seven Hundred and 00/100 \_\_\_\_\_ DOLLARS \$700.00

The Treasurer,  
Boone County Democratic Executive Committee

*Jessie Bailey*  
NOT NEGOTIABLE

⑆0519⑉0376⑆ 01 6440 0001

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

10/30/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$700.00

DATE	DESCRIPTION	AMOUNT	STATE TAX	FEDERAL TAX	REMARKS

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1700

October 30, 1978

10-31  
515

Seven Hundred and 00/100 \_\_\_\_\_ DOLLARS \$700.00

The Treasurer,  
Braxton County Democratic Executive Committee

*Jessie Bailey*  
NOT NEGOTIABLE

⑆0519⑉0376⑆ 01 6440 0001

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

10/30/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$700.00

DATE	DESCRIPTION	AMOUNT	STATE TAX	FEDERAL TAX	REMARKS

October 30 1978

Q-14  
510

7

NOT NEGOTIABLE  
Jewel Bailey  
000001

00514-0376: 01 6440 0001

DELUXE - FORM WVC-3 V-4

1709

October 30 78

150

1

Intel Linley

00514-0376: 01 64400000

DELUXE - FORM WYC-3 V-4

DATE	DESCRIPTION	AMOUNT
10/30/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$700.00

1990

2-220  
515

2

James L. Lingle

01 6440 0501

DELUXE - FORM YVPC-3 V-4

0122241271596

**\$700.00**

1709

100

7

*James L. Bailey*  
 MOTION PICTURE  
 1901

00524-0376: 01 6410 0001

DELUXE • FORM WVC-2 V-8

FCF238Y-04

1997

**\$700.00**

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100 101 102 103 104 105 106 107 108 109 110 111 112 113 114 115 116 117 118 119 120 121 122 123 124 125 126 127 128 129 130 131 132 133 134 135 136 137 138 139 140 141 142 143 144 145 146 147 148 149 150 151 152 153 154 155 156 157 158 159 160 161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182 183 184 185 186 187 188 189 190 191 192 193 194 195 196 197 198 199 200 201 202 203 204 205 206 207 208 209 210 211 212 213 214 215 216 217 218 219 220 221 222 223 224 225 226 227 228 229 230 231 232 233 234 235 236 237 238 239 240 241 242 243 244 245 246 247 248 249 250 251 252 253 254 255 256 257 258 259 260 261 262 263 264 265 266 267 268 269 270 271 272 273 274 275 276 277 278 279 280 281 282 283 284 285 286 287 288 289 290 291 292 293 294 295 296 297 298 299 300 301 302 303 304 305 306 307 308 309 310 311 312 313 314 315 316 317 318 319 320 321 322 323 324 325 326 327 328 329 330 331 332 333 334 335 336 337 338 339 340 341 342 343 344 345 346 347 348 349 350 351 352 353 354 355 356 357 358 359 360 361 362 363 364 365 366 367 368 369 370 371 372 373 374 375 376 377 378 379 380 381 382 383 384 385 386 387 388 389 390 391 392 393 394 395 396 397 398 399 400 401 402 403 404 405 406 407 408 409 410 411 412 413 414 415 416 417 418 419 420 421 422 423 424 425 426 427 428 429 430 431 432 433 434 435 436 437 438 439 440 441 442 443 444 445 446 447 448 449 450 451 452 453 454 455 456 457 458 459 460 461 462 463 464 465 466 467 468 469 470 471 472 473 474 475 476 477 478 479 480 481 482 483 484 485 486 487 488 489 490 491 492 493 494 495 496 497 498 499 500 501 502 503 504 505 506 507 508 509 510 511 512 513 514 515 516 517 518 519 520 521 522 523 524 525 526 527 528 529 530 531 532 533 534 535 536 537 538 539 540 541 542 543 544 545 546 547 548 549 550 551 552 553 554 555 556 557 558 559 560 561 562 563 564 565 566 567 568 569 570 571 572 573 574 575 576 577 578 579 580 581 582 583 584 585 586 587 588 589 590 591 592 593 594 595 596 597 598 599 600 601 602 603 604 605 606 607 608 609 610 611 612 613 614 615 616 617 618 619 620 621 622 623 624 625 626 627 628 629 630 631 632 633 634 635 636 637 638 639 640 641 642 643 644 645 646 647 648 649 650 651 652 653 654 655 656 657 658 659 660 661 662 663 664 665 666 667 668 669 670 671 672 673 674 675 676 677 678 679 680 681 682 683 684 685 686 687 688 689 690 691 692 693 694 695 696 697 698 699 700 701 702 703 704 705 706 707 708 709 710 711 712 713 714 715 716 717 718 719 720 721 722 723 724 725 726 727 728 729 730 731 732 733 734 735 736 737 738 739 740 741 742 743 744 745 746 747 748 749 750 751 752 753 754 755 756 757 758 759 760 761 762 763 764 765 766 767 768 769 770 771 772 773 774 775 776 777 778 779 780 781 782 783 784 785 786 787 788 789 790 791 792 793 794 795 796 797 798 799 800 801 802 803 804 805 806 807 808 809 810 811 812 813 814 815 816 817 818 819 820 821 822 823 824 825 826 827 828 829 830 831 832 833 834 835 836 837 838 839 840 841 842 843 844 845 846 847 848 849 850 851 852 853 854 855 856 857 858 859 860 861 862 863 864 865 866 867 868 869 870 871 872 873 874 875 876 877 878 879 880 881 882 883 884 885 886 887 888 889 890 891 892 893 894 895 896 897 898 899 900 901 902 903 904 905 906 907 908 909 910 911 912 913 914 915 916 917 918 919 920 921 922 923 924 925 926 927 928 929 930 931 932 933 934 935 936 937 938 939 940 941 942 943 944 945 946 947 948 949 950 951 952 953 954 955 956 957 958 959 960 961 962 963 964 965 966 967 968 969 970 971 972 973 974 975 976 977 978 979 980 981 982 983 984 985 986 987 988 989 990 991 992 993 994 995 996 997 998 999 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011 1012 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 1023 1024 1025 1026 1027 1028 1029 1030 1031 1032 1033 1034 1035 1036 1037 1038 1039 1040 1

...

October 30 1978

10-203  
519

Seven Hundred and 00/100

DOLLARS \$700.00

The Treasurer,  
Mason County Democratic Executive Committee

20519-03761 01 6440 0001

*Jessie Bailey*  
JESSIE BAILEY

MASON COUNTY DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/30/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$700.00

1706

MASON COUNTY DEMOCRATIC EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

October 30 1978

10-203  
519

Seven Hundred and 00/100

DOLLARS \$700.00

The Treasurer,  
Nicholas County Democratic Executive Committee

20519-03761 01 6440 0001

*Jessie Bailey*  
JESSIE BAILEY

NICHOLAS COUNTY DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/30/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$700.00

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

October 30 1978

10-31  
319

Seven and 00/100

DOLLARS \$700.00

The Treasurer,  
Putnam County Democratic Executive Committee

CONFIDENTIAL

00514-0375: 01 6460 0001

*James Bailey*  
NEGOTIABLE

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/30/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$700.00

EXTRACT

DATE

10/30/78

1708

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

October 30 1978

10-31  
319

Seven Hundred and 00/100

DOLLARS \$700.00

The Treasurer,  
Wayne County Democratic Executive Committee

CONFIDENTIAL

00514-0375: 01 6460 0001

*James Bailey*  
NEGOTIABLE

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/30/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$700.00

EXTRACT

DATE

10/30/78

WEBSTER COUNTY DEMOCRATIC EXECUTIVE COMMITTEE  
2106 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

October 30 1978

Seven Hundred and 00/100 DOLLARS \$700.00

The Treasurer,  
Webster County Democratic Executive Committee

INTERNATIONAL

20519-0376: 01 6410 0001

*James Bailey*  
NEGOTIABLE

WEBSTER COUNTY DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

10/30/78

For use solely and exclusively in the interest  
of the Democratic Ticket, in conveying voters  
to and from the polls, examining and checking  
lists of registered voters, distributing pamph-  
lets and other printed matter and in posting  
and distributing signs, banners and other  
advertisements.

\$700.00

WYOMING COUNTY DEMOCRATIC EXECUTIVE COMMITTEE  
2106 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1710

October 30 1978

Seven Hundred and 00/100 DOLLARS \$700.00

The Treasurer,  
Wyoming County Democratic Executive Committee

INTERNATIONAL

20519-0376: 01 6410 0001

*James Bailey*  
NEGOTIABLE

WYOMING COUNTY DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

10/30/78

For use solely and exclusively in the interest  
of the Democratic Ticket, in conveying voters  
to and from the polls, examining and checking  
lists of registered voters, distributing pamph-  
lets and other printed matter and in posting  
and distributing signs, banners and other  
advertisements.

\$700.00

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

10-11

October 30 1978

10-11  
319

Two Hundred and 00/100 \_\_\_\_\_ DOLLARS \$200.00

Treasurer,  
Wetzel County Democratic Executive Committee

NON NEGOTIABLE

00514003760 01 6410 0001

*James Bailey*

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/30/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$200.00

DATE	10/30/78
BY	
FOR	

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2105 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1712

October 30 1978

10-11  
319

Two Hundred and 00/100 \_\_\_\_\_ DOLLARS \$200.00

The Treasurer,  
Tyler County Democratic Executive Committee

NON NEGOTIABLE

00514003760 01 6440 0001

*James Bailey*

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

10/30/78

For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.

\$200.00

DATE	10/30/78
BY	
FOR	



1992

DOLLARS \$ 200.00

NOT NEGOTIABLE  
Jesse Bailey  
000001

00524-0376: 01 64:0/00001

DELUXE - FORM WVC-3 46

[illegible]

1714

October 30 78

22-270  
210

DOLLARS \$200.00

James Bailey  
NOT NEGOTIABLE  
0001

00524-03762 01 64.0 / 0101

DELUXE - FORM WVC-2 V-4

DATE	DESCRIPTION	AMOUNT
10/30/78	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting, and distributing signs, banners and other advertisements.	\$200.00
TOTAL		
TAX		

[illegible]

W. VA. POLITICAL PARTY EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1720

November 3 1978

1720

Five Hundred and 00/100

DOLLARS \$ 500.00

Roger W. Tompkins

CONFIDENTIAL

0051900376: 01 6440 0001

*James Bailey*  
NOT NEGOTIABLE

W. VA. POLITICAL PARTY EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

11/3/78

Roger W. Tompkins - Political Contribution

\$500.00

PAID TO				PAID BY			
NAME	ADDRESS	CITY	STATE	NAME	ADDRESS	CITY	STATE

W. VA. POLITICAL PARTY EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1721

November 3 1978

Five Hundred and 00/100

DOLLARS \$ 500.00

Lyle Sattes

CONFIDENTIAL

0051900376: 01 6440 0001

*James Bailey*  
NOT NEGOTIABLE

W. VA. POLITICAL PARTY EXECUTIVE COMMITTEE  
2100 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

DELUXE - FORM WVC-3 V-6

DESCRIPTION

AMOUNT

11/3/78

Lyle Sattes - Political Contribution

\$500.00

PAID TO				PAID BY			
NAME	ADDRESS	CITY	STATE	NAME	ADDRESS	CITY	STATE

1269

76

$$\frac{69,370}{515}$$

200.00

**THE NATIONAL BANK  
OF COMMERCE  
CHARLESTON, W. VA. 26322**

05150376 01 6440 0

~~NOT NEGOTIABLE~~

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT. NO.	AMOUNT
10/25/76	GEORGE G. GRIFFITH - Campaign Contribution General Election, 1976	\$200.00		

[illegible]

1270

76

$$\begin{array}{r} 65 \overline{) 376} \\ \underline{315} \\ 61 \end{array}$$

200.00

**THE NATIONAL BANK  
OF COMMERCE**  
CHARLESTON, W. VA. 26322

1:051503761: 01 644000

~~NOT NEGOTIABLE~~

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DATE	DESCRIPTION	AMOUNT	DISTRIBUTION	
			ACCT. NO.	AMOUNT
10/25/76	DAN TONKOVICH - Campaign Contribution General Election-1976	\$200.00		

[illegible]



1276

76

$$\frac{69.376}{515}$$

200.00

1:05150376: 01 6440/01

NOT NEGOTIABLE

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2016 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1277

76

$$\begin{array}{r} 69.375 \\ \hline 515 \end{array}$$

300.00

1:0545003761: 01 6440 01

NOT NEGOTIABLE  
 11  
 J. Bailey

[illegible]

1278

November 1

76

64-376  
515

Two hundred and 00/100

200.00

Mr. Johnny Mahon

100. 1

Calbarton, West Virginia

**INTERNATIONAL BANK**

## CONCLUSION

CHARLESTON, W. VA. 25322

1:05 15 03 76: 01 6440 01

**NOT NEGOTIABLE**

W. VA. STATE DEMOCRATIC

EXECUTIVE COMMITTEE

CHARLESTON, W. VA. 25311

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT. NO.	AMOUNT
11/1/76	For use solely and exclusively in the interest of the Democratic ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$200.00		

[illegible]

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2016 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1279

November 1

76

$$\begin{array}{r} 69-376 \\ \hline 515 \end{array}$$

Three Hundred and 00/100

300.00

Mr. R. Doyle Van Meter

P.O. Box 1348

Williamson, West Virginia

**THE NATIONAL BANK**

of COMMERCE

CHARLESTON, W. VA. 25322

1:0515"03761: 01 6440/01"

~~NOT NEGOTIABLE~~

W. VA. STATE DEMOCRATIC

EXECUTIVE COMMITTEE

CHARLESTON, W. VA. 25311

DESCRIPTION		AMOUNT	DISTRIBUTIONS	
			ACCT. NO.	AMOUNT
11/1/76	For use solely and exclusively in the interest of the Democratic ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets, and other printed matter and in posting and distributing signs, banners and other advertisements.	\$300.00		

[illegible]



1280

76

600.00

**FEDERAL BANK  
OF COMMERCE**  
CHARLESTON, W. VA. 26322

1:051503761: 01 6440 01

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT. NO.	AMOUNT
11/1/76	For use solely and exclusively in the interest of the Democratic ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$600.00		

[illegible]

1281

76

$$\begin{array}{r} 62.376 \\ \hline 515 \end{array}$$

200.00

**THE NATIONAL BANK  
OF COMMERCE  
CHARLESTON, W. VA. 26322**

051503761 01 6440 01

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT. NO.	AMOUNT
11/1/75	For use solely and exclusively in the interest of the Democratic ticket, in conveying voters to and from the polls examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$200.00		

[illegible]

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2016 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1252

November 1

76

One Hundred and 00/100

100.00

Mr. Elliott Burke  
No. 3  
L. Thornton, West Virginia

**FEDERAL BANK  
OF COMMERCE  
CHARLESTON, W. VA. 25302**

1:051503761: 01 644000

~~NOT NEGOTIABLE~~

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
200 KILLBUCK, W. VA. 25311

DATE	DESCRIPTION	AMOUNT	DISTRIBUTION	
			ACCT. NO.	AMOUNT
11/1/76	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$100.00		

[illegible]

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2016 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1283

November 1

76

$$\frac{52-376}{515}$$

One Hundred and 00/100

100.00

Mr. Watson Simpkins  
Rt. 1  
Heador, West Virginia

**THE NATIONAL BANK  
OF COMMERCE**  
CHARLESTON, W. VA. 25322

1:0515"03761: 01 6440/0"

~~NOT NEGOTIABLE~~

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT. NO.	AMOUNT
11/1/70	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, and banners and other advertisements.	\$100.00		

[illegible]

1295

75

590.00

1:0515"03761: 01 6440 01"

~~NOT NEGOTIABLE~~

1284

76

1,000.00

1:0515"0376: 01 64400"

~~NOT NEGOTIABLE~~

DATE	DESCRIPTION	AMOUNT	DISTRIBUTION	
			ACCT. NO.	AMOUNT
11/1/76	For use solely and exclusively in the interest of the Democratic Ticket, in conveying voters to and from the polls, examining and checking lists of registered voters, distributing pamphlets and other printed matter and in posting and distributing signs, banners and other advertisements.	\$1,000.00		

1225

Fifteen Hundred and 00/100-----

1500.00

**FARMERS NATIONAL BANK  
OF COMMERCE**  
CHARLESTON, W. VA. 25322

1:0515"03761: 01 6440 01"

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2016 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1230

September 14 76 57-270  
315

Fifteen Hundred Dollars

1500.00

HONORABLE LARRIE BAILEY

**THE NATIONAL BANK  
OF COMMERCE**  
CHARLESTON, W. VA. 25322

1:051503761: 01 2440 01

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLOTTON, W. VA. 25311

[illegible]



1233

76

$$\frac{60.376}{515}$$

1500.00

**THE NATIONAL BANK  
OF COMMERCE  
CHARLESTON, W. VA. 25322**

05150376: 01 6440/01

**NOT NEGOTIABLE**

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT. NO.	AMOUNT
9/14/76	Sam R. Harshbarger - Contribution on campaign for Judge West Virginia Supreme Ct. of Appeals	\$1500.00		

[illegible]

1234

76

$$\begin{array}{r} 69 \overline{) 375} \\ \underline{515} \end{array}$$

1500.00

**THE NATIONAL BANK  
OF COMMERCE  
CHARLESTON, W. VA. 25302**

1:051503761: 01 6440/011

~~NOT NEGOTIABLE~~

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT. NO.	AMOUNT
9/14/76	Thomas B. Miller - Contribution on campaign for Judge, W.Va. Supreme Court of Appeals	\$1500.00		

[illegible]



1235

September 23 76

$$\frac{53.376}{515}$$

Fifteen Hundred and 00/100-

1500.00

GUS R. DOUGLASS

**THE NATIONAL BANK  
OF COMMERCE**  
CHARLESTON, W. VA. 25322

1:051503761: 01 644001

~~NOT NEGOTIABLE~~

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT. NO.	AMOUNT
9/23/76	Gus R. Douglass - Contribution on Campaign	\$1500.00		

[illegible]

W. VA. STATE DEMOCRATIC EXECUTIVE COMMITTEE  
2016 KANAWHA BLVD., E.  
CHARLESTON, W. VA. 25311

1236

September 23 76

$$\begin{array}{r} 69.376 \\ \hline 515 \end{array}$$

Fifteen Hundred and 00/100-

1500.00

CHAUNCEY H. BROWNING, JR.

**THE NATIONAL BANK  
OF COMMERCE**  
CHARLESTON, W. VA. 25322

1:051503761 01 6440 01

~~NOT NEGOTIABLE~~

W. VA. STATE DEMOCRATIC  
EXECUTIVE COMMITTEE  
CHARLESTON, W. VA. 25311

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT. NO.	AMOUNT
9/23/76	Chauncey H. Browning, Jr., - Contribution on Campaign for Att. Gen.	\$1500.00		

[illegible]



EXHIBIT NO: 3

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

CLAIM CHECK NO.

606296

☐ -HOLD

DATE

3/14/79

1ST NOTICE

3/20

END NOTICE

3/29

RETURN

Detached from  
PS Form 3523-A  
July 1977

POSTAGE AND FEES PAID



Mr. Robert J. Burke, Treasurer  
West Virginia State Democratic  
Telethon Committee  
2106 Kanawha Boulevard, East  
Charleston, West Virginia 25311

CERTIFIED

438275



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

March 12, 1979

Mr. Robert J. Burke, Treasurer  
West Virginia State Democratic  
Telethon Committee  
2106 Kanawha Boulevard, East  
Charleston, West Virginia 25311

Dear Mr. Burke:

Enclosed for your information is a copy of the final audit report of the West Virginia State Democratic Telethon Committee which was approved by the Commission on March 8, 1979.

Upon notice of return receipt that your informational copy of the report has been received (within approximately five days), it will be released publicly by the Commission.

Should you have any questions regarding the public release of this report, please contact Mr. Fred S. Eiland of the Commission's Press Office at (202) 523-4065 or toll free at (800) 424-9530. Any questions you may yet have related to matters covered during the audit or in the audit report should be directed to Mr. Charles Hanshaw of the Audit Division at (202) 523-4155 or at the above toll free number.

Sincerely,

A handwritten signature in dark ink, appearing to read "Robert J. Costa", is written over a horizontal line.

Robert J. Costa  
Assistant Staff Director  
for the Audit Division

Enclosure as stated

CERTIFIED MAIL:  
RETURN RECEIPT REQUESTED



## FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

### REPORT OF THE AUDIT DIVISION ON THE WEST VIRGINIA STATE DEMOCRATIC TELETHON COMMITTEE

#### I. Background

##### A. Overview

This report is based on an audit of the West Virginia State Democratic Telethon Committee ("the Committee") undertaken by the Audit Division of the Federal Election Commission in accordance with the Commission's audit policy to determine whether there has been compliance with the provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The audit was conducted pursuant to Section 438(a)(8) of Title 2 of the United States Code which directs the Commission to make from time to time audits and field investigations with respect to reports and statements filed under the provisions of the Act.

The Committee registered with the United States House of Representatives on July 8, 1974 as an affiliate of the West Virginia State Democratic Executive Committee. The Committee maintains its headquarters in Charleston, West Virginia. The audit covered the period January 1, 1976 through November 17, 1978.

This audit report is based on documents and working papers which support each of the factual statements. They form part of the record upon which the Commission based its decisions on the matters in the report and were available to Commissioners and appropriate staff for review.

##### B. Key Personnel

The principal officers during the period audited were Mr. J. C. Dillon, Jr., Chairman and Mr. Robert J. Burke, Treasurer.



C. Scope

The audit included such tests as verification of total reported receipts and expenditures and individual transactions; review of required supporting documentation and analysis of Committee debts and obligations; and such other audit procedures as deemed necessary under the circumstances.

II. Auditor's Statement

It is the opinion of the Audit staff, based upon examination of the reports and statements filed and the records presented, that the West Virginia State Democratic Telethon Committee is not a political committee as defined by Section 431(d) of Title 2 of the United States Code and therefore not subject to the jurisdiction of the Commission.

This opinion is based on the fact that the Committee had no receipts or expenditures in connection with Federal elections during the period audited. The Committee came into existence to operate within West Virginia in conjunction with the Democratic National Telethon III Committee and remained in existence without requesting a waiver of reporting because of the possibility of supporting Federal candidates in the future. The Committee is receptive to being terminated as a political committee.

Recommendation

Based upon the information presented in this report, the Audit staff recommends that the Committee be administratively terminated by the Commission and informed of the termination.

8 1 7 1 0 2 1 1 3 0 4

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**FROM** Edward Rebrook III  
Attorney at Law  
Suite 344 Morrison Building  
815 Quarrier Street  
Charleston, West Virginia 25301

**TO** MS. MAURA WHITE  
FEDERAL ELECTION COMMISSION  
WASHINGTON, D. C. 20463

CERTIFIED

No. 569321

MAIL

20:21d 11J3S08



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 5, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Robert Burke, Treasurer  
West Virginia State Democratic  
Executive Committee  
2106 Kanawha Blvd., E.  
Charleston, West Virginia 25311

Re: MUR 1227

Dear Mr. Burke:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, found evidence that your committee may have violated sections 433 and 434 of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, the committee's transfer of \$3,500 in 1976 and \$40,900 in 1978 to county committees and individuals for election day expenses may have obligated the committee to register and file reports with the Commission.

An investigation has been conducted and after considering the circumstances of this matter, the Commission determined, on August 4, 1980, that there is reason to believe that your committee violated 2 U.S.C. §§ 433 and 434. A report on the Commission's finding is enclosed for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

All committees which meet the definition of political committee under the Act are required to register and report with the Commission. A political committee, in the case of a state party committee, is defined to mean any committee, association, or other group of persons which receives contributions to influence federal elections aggregating in excess of \$1,000 during a calendar year or makes expenditures to influence federal elections aggregating in excess of \$1,000 during a calendar year.

The payment of "get-out-the-vote" expenses by a political party committee may qualify the committee as a political committee under the Act. Get-out-the-vote expenses should be allocated on a reasonable basis between federal and non-federal activity during a federal election year. 11 C.F.R. § 106.1(e).

Letter to: R. Burke  
Page 2

Please submit answers to the enclosed questions within 15 days of receipt of this letter.

In the absence of additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) (formerly § 437g(a)(3)(B)) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions please contact Maura White, the staff member assigned to this matter, at 202-523-4060.

Sincerely,

*Max L. Friedersdorf*  
Max L. Friedersdorf  
Chairman

PS Form 3811, Aug. 1978

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

The following service is requested (check one):  
☐ Show to whom and date delivered  
☐ Show to whom, date, and address of delivery  
☐ RESTRICTED DELIVERY  
☐ Show to whom and date delivered  
☐ RESTRICTED DELIVERY  
☐ Show to whom, date, and address of delivery. \$  
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
*Robert Burke Blvd E  
2196 Cambridge  
Charleston West Va*

3. ARTICLE DESCRIPTION:  
*25311*

REGISTERED NO. *745217* INSURED NO. *52*

1. (Always obtain signature of addressee or agent)  
I have received the article described above. ☒ Addressee ☐ Authorized agent  
SIGNATURE *J. Bailey*

4. DATE OF DELIVERY *8-8-80*

5. ADDRESS (Complete only if requested)  
*2530*

6. UNABLE TO DELIVER BECAUSE  
*MUR 1227 MAR*

POSTMARK *CHARLESTON WV 8 AUG 1980*

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



For the purposes of these questions, the West Virginia State Democratic Executive Committee shall be referred to as "WVSDEC."

1. Did the WVSDEC engage in any get-out-the-vote ("GOTV") or voter registration activities during 1976 or 1978? If the answer is yes, state, for each year, whether or not the activities included the support of federal candidates.
- 2a) Explain the nature and purpose (e.g. taking voters to the polls, slate card/sample ballot) of all transfers, as reported to the state of West Virginia, made by the WVSDEC to individuals or county committees for "general election day expenses," totalling \$3,500, on November 1, 1976.
- b) For all transfers made on November 1, 1976, for "general election day expenses," list the name of all federal candidates on whose behalf GOTV or voter registration expenses were incurred and explain the activity which constituted the expense.
- c) What portion of the \$3,500 expended on November 1, 1976, for "general election day expenses" was spent on the costs of preparation, display, mailing, or other distribution, with respect to a printed slate card or sample ballot, or other printed listing, of three or more candidates for any public office for which an election was held in West Virginia, and where such costs were not incurred with respect to a display made on broadcasting stations, newspapers, magazines, or similar types of general public political advertising?
3. For all transfers made on November 1, 1976, for "general election day expenses," state the name of all candidates (both federal and state), by office sought, who were seeking election in those areas where GOTV or voter registration expenses were incurred.

- 4a) Explain the nature and purpose (e.g. taking voters to the polls, slate card/sample ballot) of all transfers, as reported to the state of West Virginia, made by the WVSDEC to individuals and county committees for "general election day expenses," totalling \$40,900 on October 13 and 30, 1978.
  - b) For all transfers made on October 13 and 30, 1978, for "general election day expenses," list the name of all federal candidates on whose behalf GOTV or voter registration expenses were incurred and explain the activity which constituted the expense.
  - c) What portion of the \$40,900 expended on October 13 and October 30, 1978, for "general election day expenses" was spent on the costs of preparation, display, mailing, or other distribution, with respect to a printed slate card or sample ballot, or other printed listing, of three or more candidates for any public office for which an election was held in West Virginia, and where such costs were not incurred with respect to a display made on broadcasting stations, newspapers, magazines, or similar types of general public political advertising?
- 5) For all transfers made on October 13, and 30, 1978, for "general election day expenses," state the name of all candidates (both federal and state), by office sought, who were seeking election in those areas where GOTV or voter registration expenses were incurred.
  - 6) In addition to the "general election day" expenses incurred by the WVSDEC on November 1, 1976, and October 13 and 30, 1978, has the WVDEC engaged in any other GOTV or voter registration activities? If the answer is yes, please explain the nature of the activity, the amounts expended on that activity, and the date the activity occurred.
  - 7) Explain the nature and purpose of the transfer of \$1,000 to the Kanawha County Democratic Executive Committee, a federally registered committee, on or about November 4, 1978.

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE August 5, 1980

MUR NO. 1227  
STAFF MEMBER(S) & TEL. NO.  
Maura White/ David Branch

RESPONDENT West Virginia State Democratic  
Executive Committee

(202) 523-4060

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On March 28, 1980, the Reports Analysis Division ("RAD") referred the name of the West Virginia Democratic Executive Committee to the Office of General Counsel for failure to register with, and report to, the Commission in violation of 2 U.S.C. §§ 433 and 434.

FACTUAL BASIS & LEGAL ANALYSIS

A. (1) West Virginia State Democratic Executive Committee  
("Executive Committee")

During the audit of the West Virginia State Democratic Telethon Committee, Audit received copies of the West Virginia state reports and records of the Executive Committee. The Executive Committee conducts the non-federal activities of the Democratic Party of West Virginia.

Audit's review of the state reports of the Executive Committee revealed that during November 1976 ten transfers totalling \$3,500 were made to two unregistered county committees and eight individuals for "election day expenses." Also, during October, 1978, 106 transfers totalling \$40,900 were made to 55 unregistered county committees for the same purpose. 1/

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1/ Audit noted that the official of the Telethon Committee who presented the state reports of the Executive Committee to them, stated that the Executive Committee had sought guidance from the Commission with respect to the handling of "election days expenses," and based upon information received, attached a memorandum to each transfer check informing the recipient committees and individuals of the restricted use of the amounts transferred. Documentation concerning the communication with the Commission was not retained and the official was unable to provide further information concerning it.

It is the opinion of Audit that the transfers were made for GOTV activity. Additionally, it should be noted that one of the 106 transfers made in October 1978 totalling \$1,100 was made to the Kanawha County Democratic Executive Committee, a registered committee. Moreover, the Kanawha County Democratic Executive Committee also reported the receipt of a \$1,000 transfer from the Executive Committee during November 1978. Although we have no information as to the purpose of this transaction, it appears that this transfer may have been for "election day expenses" as well.

#### B. ANALYSIS

The Commission has recognized in Advisory Opinion 1978-50 that GOTV and voter registration expenditures are considered administrative expenses and may be allocated in the same manner as administrative expenses. Pursuant to 11 C.F.R. § 106.1(e) party committees and other political committees which have established federal campaign committees shall allocate administrative expenses on a reasonable basis between their federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis. The Commission has further recognized in Advisory Opinions 1978-50, 1978-28, 1978-102, 1978-10, Re: AOR 1978-72, and its September 1977 guideline, that various methods may be "reasonable" for the allocation of the GOTV expenses of political parties. Additionally, the Commission has held in AO 1978-28 that the expenses of a political party organization for GOTV drives in a federal election year are, at least in part, for the purpose of influencing the election of persons to federal office even though the drive is not conducted expressly or exclusively on behalf of federal candidates. See also AO 1978-50 and AO 1978-10.

2 U.S.C. § 431(e)(5)(E) and 11 C.F.R. § 100.4(b)(7) (recodified at 2 U.S.C. § 431(8)(B)(v) and § 100.7(b)(9)) exclude from the definition of contribution the payment by a state or local committee of a political party of the costs of preparation, display, or mailing or other distribution incurred by the committee with respect to a printed slate card, sample ballot, palm card, or other printed listing of three or more candidates for any public office for which an election is held in the state in which the committee is organized.

2 U.S.C. § 431(f)(4)(G) and 11 C.F.R. § 100.7(b)(11) (recodified at 2 U.S.C. § 431(9)(B)(iv) and 11 C.F.R. § 100.8(b)(10)) exclude from the definition of expenditure the payment, by a state or local committee of a political party, of the costs of preparation, display, or mailing or other distribution incurred by the Committee with respect to a printed slate card, sample ballot, palm card, or other printed listing of three or more candidates for any public office for which an election is held in the state in which the committee is organized.

To: West Virginia State Democratic Executive Committee  
Notification of RTB finding

- 3 -

Prior to the passage of the 1979 amendments to the Act, a political committee was defined to include any committee, club, organization, or other groups of persons which received contributions or made expenditures during a calendar year in an aggregate amount exceeding \$1,000. 2 U.S.C. § 431(d) and 11 C.F.R. § 100.14. 2 U.S.C. § 434 requires that the treasurer of a political committee file reports of receipts and expenditures with the Commission. 2 U.S.C. § 433 requires that each political committee file a statement of organization with the Commission.

The application of any of the approved reasonable methods of allocation of GOTV activity would most probably result in a determination that the respondent committee, the Executive Committee, was a political committee under the Act prior to the 1979 amendments to the Act. As the Executive Committee transferred a substantial amount of funds to county committees during 1978 for apparent GOTV activity, and because it transferred \$2,100 to the Kanawha County Democratic Executive Committee, a registered committee, during 1978, the General Counsel recommends that the Commission find reason to believe that the West Virginia State Democratic Executive Committee violated 2 U.S.C. §§ 433 and 434.

Based on the foregoing analysis, the Federal Election Commission has found:

1) Reason to Believe that the West Virginia State Democratic Executive Committee violated 2 U.S.C. §§ 433 and 434.



MEMO TO THE FILE

MUR 127

FROM: Maura White *mw*

DATE: August 20, 1980

The attached letter to the Committee for a Better Logan County was returned to the Commission due to a "insufficient address." The West Virginia Secretary of State's office has no listing for this committee. In view of the fact that the committee appears to be no longer in existence, the letter should be filed in the permanent file.

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

POSTAGE AND FEES PAID



Committee for a Better  
Logan County  
527 Stratton Street  
Logan, West Virginia

AUG 26

ANK  
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this  
Bdell

CERTIFIED

945728

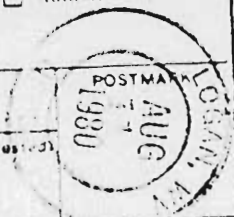


PS Form 3811, Aug. 1972

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

2 SENDER Complete items 1 through 5. Add your address in the "POSTMASTER" box space on reverse.		
1 The following service is requested (check one): <input checked="" type="checkbox"/> Show to whom and date delivered Show to whom, date, and address of delivery <input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered <input type="checkbox"/> RESTRICTED DELIVERY Show to whom, date, and address of delivery \$ (CONSULT POSTMASTER FOR FEES)		
ARTICLE ADDRESSED TO <i>Courtesy for a Better Hogan County 537 W. 1st St.</i>		
1 ARTICLE DESCRIPTION <i>Book, 100 p.</i>		
REGISTERED NO.	CERTIFIED NO. INSURED NO.	
	<i>945723</i>	
(Always obtain signature of addressee or agent)		
I have received the article described above SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent		
4 DATE OF DELIVERY		
5 ADDRESS (Complete only if requested)		
6 UNABLE TO DELIVER BECAUSE <i>Insufficient Address</i>		
CLERK'S INITIALS <i>[Signature]</i>		

*MAX 1237 MW*





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 5, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Committee for a Better  
Logan County  
527 Stratton Street  
Logan, West Virginia

Re: MUR 1227

Dear Sir or Madam:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, found evidence that your committee may have violated sections 433 and 434 of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, the committee's receipt of \$5,000 from the Keep Nick Rahall in Congress Committee during 1978 for precinct organization and election day expenses may have obligated the committee to register and file reports with the Commission.

An investigation has been conducted and after considering the circumstances of this matter, the Commission determined, on August 4, 1980, that there is reason to believe that your committee violated 2 U.S.C. §§ 433 and 434 and further determined to take no further action in this matter. Accordingly, the file has been closed.

Please be advised that the 1979 amendments to the Act have amended the definition of "political committee" to include any local committee of a political party which receives contributions aggregating in excess of \$5,000 during a calendar year, or makes payments exempted from the definition of "contribution" or "expenditures" (as defined at 2 U.S.C. § 431(8) and 431(9)) aggregating in excess of \$5,000 during a calendar year, or makes contributions aggregating in excess of \$1,000 during a calendar year or makes expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(C). All committees which meet the definition of a political committee under the Act are required to register and report with the Commission.

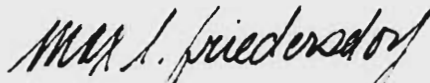
The payment of "get-out-the-vote" expenses by a political party committee may qualify the committee as a political committee under the Act. Get-out-the-vote expenses should be allocated on a reasonable basis between federal and non-federal activity during a federal election year. 11 C.F.R. § 106.1(e). If a political party committee makes payments exempt from the definition of "contribution" or "expenditure" (2 U.S.C. §§ 431(8) and (9)),

allocable to federal candidates, in excess of \$5,000 per calendar year, or makes expenditures for other get-out-the-vote activities, allocable to federal candidates not exempted from the definition of "contribution" or "expenditure" (2 U.S.C. §§ 431(8) and (9)) in excess of \$1,000 per calendar year, then the committee qualifies as a political committee under the Act, and must register with the Commission within 10 days of becoming a political committee.

A report on the Commission's finding is enclosed for your information.

If you have any questions please contact Maura White, the staff member assigned to this matter, at 202/523-4060.

Sincerely,



Max L. Friedersdorf  
Chairman

Enclosure

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE August 5, 1980

MUR NO. 1227  
STAFF MEMBER(S) & TEL. NO.  
Maura White/ David Branch  
(202) 523-4060

RESPONDENT Committee for a Better Logan  
County

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On March 28, 1980, the Reports Analysis Division ("RAD") referred the name of the Committee for a Better Logan County to the Office of General Counsel for failure to register with, and report to, the Commission in violation of 2 U.S.C. §§ 433 and 434.

FACTUAL BASIS & LEGAL ANALYSIS

(1) Committee for a Better Logan County

Audit performed a cursory review of disclosure reports filed by federal candidates in West Virginia during the course of the audit of the West Virginia State Democratic Telethon Committee. As a result of this review, it was determined that during May 1978 the Keep Nick Rahall In Congress Committee, a federal committee, made a transfer of \$5,000 to the Committee for a Better Logan County. The particulars of this expenditure was listed as "precinct organization and election day expense."

On December 18, 1979, RAD mailed the Keep Nick Rahall In Congress Committee a request for additional information ("RFAI") concerning the \$5,000 reported as expenditures in May 1978 for election day expenses; the committee's response stated that the monies "transferred" to the political committee were to help defray the expenses the committee had in the county for such things as signs, sample ballots, expenses for vehicles taking voters to the polls, and a 'get out the vote' type operation.



B. ANALYSIS

The Commission has recognized in Advisory Opinion 1978-50 that GOTV and voter registration expenditures are considered administrative expenses and may be allocated in the same manner as administrative expenses. Pursuant to 11 C.F.R. § 106.1(e) party committees and other political committees which have established federal campaign committees shall allocate administrative expenses on a reasonable basis between their federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis. The Commission has further recognized in Advisory Opinions 1978-50, 1978-28, 1978-102, 1978-10, Re: AOR 1978-72, and its September 1977 guideline, that various methods may be "reasonable" for the allocation of the GOTV expenses of political parties. Additionally, the Commission has held in AO 1978-28 that the expenses of a political party organization for GOTV drives in a federal election year are, at least in part, for the purpose of influencing the election of persons to federal office even though the drive is not conducted expressly or exclusively on behalf of federal candidates. See also AO 1978-50 and AO 1978-10.

2 U.S.C. § 431(e)(5)(E) and 11 C.F.R. § 100.4(b)(7) (recodified at 2 U.S.C. § 431(8)(B)(v) and § 100.7(b)(9)) exclude from the definition of contribution the payment by a state or local committee of a political party of the costs of preparation, display, or mailing or other distribution incurred by the committee with respect to a printed slate card, sample ballot, palm card, or other printed listing of three or more candidates for any public office for which an election is held in the state in which the committee is organized.

2 U.S.C. § 431(f)(4)(G) and 11 C.F.R. § 100.7(b)(11) (recodified at 2 U.S.C. § 431(9)(B)(iv) and 11 C.F.R. § 100.8(b)(10)) exclude from the definition of expenditure the payment, by a state or local committee of a political party, of the costs of preparation, display, or mailing or other distribution incurred by the Committee with respect to a printed slate card, sample ballot, palm card, or other printed listing of three or more candidates for any public office for which an election is held in the state in which the committee is organized. The 1979 amendments to the Act further exclude from the definition of contribution, and expenditure, the payment by a state or local political party committee of the costs of campaign materials (such as pins, bumper stickers, handbills, brochures, party tabloids, and yard signs) used by such committee in connection with volunteer activities on behalf of the nominees of such party provided that such payments are not for the costs of campaign materials or activities used in connection with any broadcasting, newspaper, magazine, billboard, direct mail, or similar type of general public communication or political advertising. 2 U.S.C. § 431(8)(B)(x) and 11 C.F.R. § 100.7(b)(15) and 2 U.S.C. § 431(9)(B)(viii) and 11 C.F.R. § 100.8(b)(16).

Prior to the passage of the 1979 amendments to the Act, a political committee was defined to include any committee, club, organization, or other groups of persons which received contributions or made expenditures during a calendar year in an aggregate amount exceeding \$1,000. 2 U.S.C. § 431(d) and 11 C.F.R. § 100.14. The 1979 amendments to the Act, however, amended the definition of political committee to include the local committee of a political party which receives contributions aggregating in excess of \$5,000 during a calendar year, or makes payments exempted from the definition of contribution or expenditure aggregating in excess of \$5,000 per year, or makes contributions or expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(C) and 11 C.F.R. § 100.5(c). State party committees are defined to be political committees under the Act if they receive contributions or makes expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(A) (former 2 U.S.C. § 431(d)). 2 U.S.C. § 434 requires that the treasurer of a political committee file reports of receipts and expenditures with the Commission. 2 U.S.C. § 433 requires that each political committee file a statement of organization with the Commission.

Besides the receipt of the \$5,000 transfer during 1978, there is no evidence of any other activity by the Committee for a Better Logan County which would bring it under the jurisdiction of the Commission. Because of this consideration and because it would not be in the Commission's interest to require this committee to register and report to the Commission as a result of activity which may no longer be sufficient to qualify the respondent committee as a political committee under the Act, the General Counsel recommends that the Commission find reason to believe that the Committee for a Better Logan County violated 2 U.S.C. §§ 433 and 434 and take no further action in this matter.

Based on the foregoing analysis, the Federal Election Commission has found:

- 1) Reason to Believe that the Committee for a Better Logan County violated 2 U.S.C. §§ 433 and 434 and determined to take no further action in this matter.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 5, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

E. Donald Evans, Treasurer  
Mingo County Democratic  
Executive Committee  
Box 36  
Williamson, West Virginia 25661

Re: MUR 1227

Dear Mr. Evans:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, found evidence that your committee may have violated sections 433 and 434 of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, the committee's receipt of \$4,000 from the Keep Nick Rahall in Congress Committee during 1978 for precinct organization and election day expenses may have obligated the committee to register and file reports with the Commission.

An investigation has been conducted and after considering the circumstances of this matter, the Commission determined, on August 4, 1980, that there is reason to believe that your committee violated 2 U.S.C. §§ 433 and 434 and further determined to take no further action in this matter. Accordingly, the file has been closed.

Please be advised that the 1979 amendments to the Act have amended the definition of "political committee" to include any local committee of a political party which receives contributions aggregating in excess of \$5,000 during a calendar year, or makes payments exempted from the definition of "contribution" or "expenditures" (as defined at 2 U.S.C. § 431(8) and 431(9)) aggregating in excess of \$5,000 during a calendar year, or makes contributions aggregating in excess of \$1,000 during a calendar year or makes expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(C). All committees which meet the definition of a political committee under the Act are required to register and report with the Commission.

The payment of "get-out-the-vote" expenses by a political party committee may qualify the committee as a political committee under the Act. Get-out-the-vote expenses should be allocated on a reasonable basis between federal and non-federal activity during a federal election year. 11 C.F.R. § 106.1(e). If a political party committee makes payments exempt from the definition of "contribution" or "expenditure" (2 U.S.C. §§ 431(8) and (9)),



allocable to federal candidates, in excess of \$5,000 per calendar year, or makes expenditures for other get-out-the-vote activities, allocable to federal candidates not exempted from the definition of "contribution" or "expenditure" (2 U.S.C. §§ 431(8) and (9)) in excess of \$1,000 per calendar year, then the committee qualifies as a political committee under the Act, and must register with the Commission within 10 days of becoming a political committee.

A report on the Commission's finding is enclosed for your information.

If you have any questions please contact Maura White, the staff member assigned to this matter, at 202/523-4060.

Sincerely,

*Max L. Friedersdorf*  
Max L. Friedersdorf  
Chairman

Enclosure

SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.	
1. The following service is requested (check one). <input checked="" type="checkbox"/> Show to whom and date delivered _____ <input type="checkbox"/> Show to whom, date, and address of delivery _____ <input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered _____ <input type="checkbox"/> RESTRICTED DELIVERY Show to whom, date, and address of delivery \$ _____ (CONSULT POSTMASTER FOR FEES)	
2. ARTICLE ADDRESSED TO: <i>E. Donald Evans, Texas</i>	
3. ARTICLE DESCRIPTION: <i>Oct 36 Williamson, West VA</i>	
REGISTERED NO. <i>945227</i>	CERTIFIED NO. <i>25661</i>
4. I have received the article described above. SIGNATURE <input checked="" type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent <i>J. D. Sanders</i>	
5. ADDRESS (Complete only if requested) <i>ALB - 1980</i>	
6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS <i>MUR 1287 MW</i>	

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE August 5, 1980

MUR NO. 1227  
STAFF MEMBER(S) & TEL. NO.  
Maura White/ David Branch  
(202) 523-4060

RESPONDENT Mingo County Democratic Executive  
Committee

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On March 28, 1980, the Reports Analysis Division ("RAD") referred the name of the Mingo County Democratic Executive Committee to the Office of General Counsel for failure to register with, and report to, the Commission in violation of 2 U.S.C. §§ 433 and 434.

FACTUAL BASIS & LEGAL ANALYSIS

(1) Mingo County Democratic Executive Committee

Audit performed a cursory review of disclosure reports filed by federal candidates in West Virginia during the course of the audit of the West Virginia State Democratic Telethon Committee. As a result of this review, it was determined that during May 1978 the Keep Nick Rahall In Congress Committee, a federal committee, made two transfers totalling \$4,000 to the Mingo County Democratic Executive Committee. The particulars of these expenditures were listed as "precinct organization and election day expense."

On December 18, 1979, RAD mailed the Keep Nick Rahall In Congress Committee a request for additional information ("RAFI") concerning the \$4,000 reported as expenditures in May 1978 for election day expenses; the committee's response stated that the monies "transferred" to the political committee were to help defray the expenses the Committee had in the county for such things as signs, sample ballots, expenses for vehicles taking voters to the polls, and a 'get out the vote' type operation.

B. ANALYSIS

The Commission has recognized in Advisory Opinion 1978-50 that GOTV and voter registration expenditures are considered administrative expenses and may be allocated in the same manner as administrative expenses. Pursuant to 11 C.F.R. § 106.1(e) party committees and other political committees which have established federal campaign committees shall allocate administrative expenses on a reasonable basis between their federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis. The Commission has further recognized in Advisory Opinions 1978-50, 1978-28, 1978-102, 1978-10, Re: AOR 1978-72, and its September 1977 guideline, that various methods may be "reasonable" for the allocation of the GOTV expenses of political parties. Additionally, the Commission has held in AO 1978-28 that the expenses of a political party organization for GOTV drives in a federal election year are, at least in part, for the purpose of influencing the election of persons to federal office even though the drive is not conducted expressly or exclusively on behalf of federal candidates. See also AO 1978-50 and AO 1978-10.

2 U.S.C. § 431(e)(5)(E) and 11 C.F.R. § 100.4(b)(7) (recodified at 2 U.S.C. § 431(8)(B)(v) and § 100.7(b)(9)) exclude from the definition of contribution the payment by a state or local committee of a political party of the costs of preparation, display, or mailing or other distribution incurred by the committee with respect to a printed slate card, sample ballot, palm card, or other printed listing of three or more candidates for any public office for which an election is held in the state in which the committee is organized.

2 U.S.C. § 431(f)(4)(G) and 11 C.F.R. § 100.7(b)(11) (recodified at 2 U.S.C. § 431(9)(B)(iv) and 11 C.F.R. § 100.8(b)(10)) exclude from the definition of expenditure the payment, by a state or local committee of a political party, of the costs of preparation, display, or mailing or other distribution incurred by the Committee with respect to a printed slate card, sample ballot, palm card, or other printed listing of three or more candidates for any public office for which an election is held in the state in which the committee is organized. The 1979 amendments to the Act further exclude from the definition of contribution, and expenditure, the payment by a state or local political party committee of the costs of campaign materials (such as pins, bumper stickers, handbills, brochures, party tabloids, and yard signs) used by such committee in connection with volunteer activities on behalf of the nominees of such party provided that such payments are not for the costs of campaign materials or activities used in connection with any broadcasting, newspaper, magazine, billboard, direct mail, or similar type of general public communication or political advertising. 2 U.S.C. § 431(8)(B)(x) and 11 C.F.R. § 100.7(b)(15) and 2 U.S.C. § 431(9)(B)(viii) and 11 C.F.R. § 100.8(b)(16).

To: Mingo County Democratic Executive Committee  
Notification of RT finding

- 3 -

Prior to the passage of the 1979 amendments to the Act, a political committee was defined to include any committee, club, organization, or other groups of persons which received contributions or made expenditures during a calendar year in an aggregate amount exceeding \$1,000. 2 U.S.C. § 431(d) and 11 C.F.R. § 100.14. The 1979 amendments to the Act, however, amended the definition of political committee to include the local committee of a political party which receives contributions aggregating in excess of \$5,000 during a calendar year, or makes payments exempted from the definition of contribution or expenditure aggregating in excess of \$5,000 per year, or makes contributions or expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(C) and 11 C.F.R. § 100.5(c). State party committees are defined to be political committees under the Act if they receive contributions or makes expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(A) (former 2 U.S.C. § 431(d)). 2 U.S.C. § 434 requires that the treasurer of a political committee file reports of receipts and expenditures with the Commission. 2 U.S.C. § 433 requires that each political committee file a statement of organization with the Commission.

Besides the receipt of the \$4,000 transfer during 1978, there is no evidence of any other activity by the Mingo County Democratic Executive Committee, which would bring it under the jurisdiction of the Commission. Because of this consideration and because it would not be in the Commission's interest to require this committee to register and report to the Commission as a result of activity which may no longer be sufficient to qualify the committee as a political committee under the Act, the General Counsel recommends that the Commission find reason to believe that the Mingo County Democratic Executive Committee violated 2 U.S.C. §§ 433 and 434 and take no further action in this matter.

Based on the foregoing analysis, the Federal Election Commission has found:

1) Reason to Believe that the Mingo County Democratic Executive Committee violated 2 U.S.C. §§ 433 and 434 and determined to take no further action in this matter.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 5, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Independent Democrats Committee  
P.O. Box 810  
Logan, West Virginia

Re: MUR 1227

Dear Sir or Madam:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, found evidence that your committee may have violated sections 433 and 434 of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, the committee's receipt of \$5,000 from the Keep Nick Rahall in Congress Committee during 1978 for precinct organization and election day expenses may have obligated the committee to register and file reports with the Commission.

An investigation has been conducted and after considering the circumstances of this matter, the Commission determined, on August 4, 1980, that there is reason to believe that your committee violated 2 U.S.C. §§ 433 and 434 and further determined to take no further action in this matter. Accordingly, the file has been closed.

Please be advised that the 1979 amendments to the Act have amended the definition of "political committee" to include any local committee of a political party which receives contributions aggregating in excess of \$5,000 during a calendar year, or makes payments exempted from the definition of "contribution" or "expenditures" (as defined at 2 U.S.C. § 431(8) and 431(9)) aggregating in excess of \$5,000 during a calendar year, or makes contributions aggregating in excess of \$1,000 during a calendar year or makes expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(C). All committees which meet the definition of a political committee under the Act are required to register and report with the Commission.

The payment of "get-out-the-vote" expenses by a political party committee may qualify the committee as a political committee under the Act. Get-out-the-vote expenses should be allocated on a reasonable basis between federal and non-federal activity during a federal election year. 11 C.F.R. § 106.1(e). If a political party committee makes payments exempt from the definition of "contribution" or "expenditure" (2 U.S.C. §§ 431(8) and (9)),



allocable to federal candidates, in excess of \$5,000 per calendar year, or makes expenditures for other get-out-the-vote activities, allocable to federal candidates not exempted from the definition of "contribution" or "expenditure" (2 U.S.C. §§ 431(8) and (9)) in excess of \$1,000 per calendar year, then the committee qualifies as a political committee under the Act, and must register with the Commission within 10 days of becoming a political committee.

A report on the Commission's finding is enclosed for your information.

If you have any questions please contact Maura White, the staff member assigned to this matter, at 202/523-4060.

Sincerely,

*Max L. Friedersdorf*  
Max L. Friedersdorf  
Chairman

Enclosure

● SENDER (Complete items 1, 2, and 3) Add your address in the "RETURN TO" space on reverse		1. The following service is requested (check one): <input type="checkbox"/> Show to whom and date delivered <input type="checkbox"/> Show to whom date, and address of delivery <input checked="" type="checkbox"/> RESTRICTED DELIVERY <input type="checkbox"/> Show to whom and date delivered <input type="checkbox"/> RESTRICTED DELIVERY Show to whom, date, and address of delivery. \$ (CONSULT POSTMASTER FOR FEES)	
2. ARTICLE ADDRESSED TO: <i>Independent Dem. Comm. P.O. Box 810 Logan, West Va.</i>		REGISTERED NO. <i>945730</i> INSURED NO.	
3. ARTICLE DESCRIPTION:		1. (Always obtain signature of addressee or agent) I have received the article described above. SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent	
4. DATE OF DELIVERY <i>Aug 11 1980</i>		5. ADDRESS (Complete only if requested) <i>Logan, WV</i>	
6. UNABLE TO DELIVER BECAUSE:		CARRIER'S INITIALS <i>[Signature]</i>	

PS Form 3811, Aug 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1070-275-042

*MUR 1227 MW*

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE August 5, 1980

MUR NO. 1227  
STAFF MEMBER(S) & TEL. NO.  
Maura White/ David Branch  
(202) 523-4060

RESPONDENT Independent Democrats Committee

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On March 28, 1980, the Reports Analysis Division ("RAD") referred the name of the Independent Democrats Committee to the Office of General Counsel for failure to register with, and report to, the Commission in violation of 2 U.S.C. §§ 433 and 434.

FACTUAL BASIS & LEGAL ANALYSIS

(1) Independent Democrats Committee

Audit performed a cursory review of disclosure reports filed by federal candidates in West Virginia during the course of the audit of the West Virginia State Democratic Telethon Committee. As a result of this review, it was determined that during May 1978 the Keep Nick Rahall In Congress Committee, a federal committee, made two transfers totalling \$5,000 to the Independent Democrats Committee. The particulars of these expenditures were listed as "precinct organization and election day expense."

On December 18, 1979, RAD mailed the Keep Nick Rahall In Congress Committee a request for additional information ("RFAI") concerning the \$5,000 reported as expenditures in May 1978 for election day expenses; the committee's response stated that the monies "transferred" to the political committee were to help defray the expenses the Committee had in the county for such things as signs, sample ballots, expenses for vehicles taking voters to the polls, and a 'get out the vote' type operation.



B. ANALYSIS

The Commission has recognized in Advisory Opinion 1978-50 that GOTV and voter registration expenditures are considered administrative expenses and may be allocated in the same manner as administrative expenses. Pursuant to 11 C.F.R. § 106.1(e) party committees and other political committees which have established federal campaign committees shall allocate administrative expenses on a reasonable basis between their federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis. The Commission has further recognized in Advisory Opinions 1978-50, 1978-28, 1978-102, 1978-10, Re: AOR 1978-72, and its September 1977 guideline, that various methods may be "reasonable" for the allocation of the GOTV expenses of political parties. Additionally, the Commission has held in AO 1978-28 that the expenses of a political party organization for GOTV drives in a federal election year are, at least in part, for the purpose of influencing the election of persons to federal office even though the drive is not conducted expressly or exclusively on behalf of federal candidates. See also AO 1978-50 and AO 1978-10.

2 U.S.C. § 431(e)(5)(E) and 11 C.F.R. § 100.4(b)(7) (recodified at 2 U.S.C. § 431(8)(B)(v) and § 100.7(b)(9)) exclude from the definition of contribution the payment by a state or local committee of a political party of the costs of preparation, display, or mailing or other distribution incurred by the committee with respect to a printed slate card, sample ballot, palm card, or other printed listing of three or more candidates for any public office for which an election is held in the state in which the committee is organized.

2 U.S.C. § 431(f)(4)(G) and 11 C.F.R. § 100.7(b)(11) (recodified at 2 U.S.C. § 431(9)(B)(iv) and 11 C.F.R. § 100.8(b)(10)) exclude from the definition of expenditure the payment, by a state or local committee of a political party, of the costs of preparation, display, or mailing or other distribution incurred by the Committee with respect to a printed slate card, sample ballot, palm card, or other printed listing of three or more candidates for any public office for which an election is held in the state in which the committee is organized. The 1979 amendments to the Act further exclude from the definition of contribution, and expenditure, the payment by a state or local political party committee of the costs of campaign materials (such as pins, bumper stickers, handbills, brochures, party tabloids, and yard signs) used by such committee in connection with volunteer activities on behalf of the nominees of such party provided that such payments are not for the costs of campaign materials or activities used in connection with any broadcasting, newspaper, magazine, billboard, direct mail, or similar type of general public communication or political advertising. 2 U.S.C. § 431(8)(B)(x) and 11 C.F.R. § 100.7(b)(15) and 2 U.S.C. § 431(9)(B)(viii) and 11 C.F.R. § 100.8(b)(16).

Prior to the passage of the 1979 amendments to the Act, a political committee was defined to include any committee, club, organization, or other groups of persons which received contributions or made expenditures during a calendar year in an aggregate amount exceeding \$1,000. 2 U.S.C. § 431(d) and 11 C.F.R. § 100.14. The 1979 amendments to the Act, however, amended the definition of political committee to include the local committee of a political party which receives contributions aggregating in excess of \$5,000 during a calendar year, or makes payments exempted from the definition of contribution or expenditure aggregating in excess of \$5,000 per year, or makes contributions or expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(C) and 11 C.F.R. § 100.5(c). State party committees are defined to be political committees under the Act if they receive contributions or makes expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(A) (former 2 U.S.C. § 431(d)). 2 U.S.C. § 434 requires that the treasurer of a political committee file reports of receipts and expenditures with the Commission. 2 U.S.C. § 433 requires that each political committee file a statement of organization with the Commission.

Besides the receipt of the \$5,000 transfer during 1978, there is no evidence of any other activity by the Independent Democrats Committee which would bring it under the jurisdiction of the Commission. Because of this consideration and because it would not be in the Commission's interest to require this committee to register and report to the Commission as a result of activity which may no longer be sufficient to qualify the committee as a political committee under the Act, the General Counsel recommends that the Commission find reason to believe that the Independent Democrats Committee violated 2 U.S.C. § 433 and 434 and take no further action in this matter.

Based on the foregoing analysis, the Federal Election Commission has found:

1) Reason to Believe that the Independent Democrats Committee violated 2 U.S.C. §§ 433 and 434 and further determined to take no further action in this matter.

MUR 1227

MEMO TO THE FILE

FROM: Maura White

September 3, 1980

The attached letter to the 1976 Logan County Democratic Campaign Committee, which has been returned to the Commission by the U.S. Post Office, should be filed in the permanent file as no other address is known for the committee.

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

POSTAGE AND FEES PAID



Thomas A. Tomblin, Treasurer  
1976 Logan County Democratic  
Campaign Committee  
Box 813  
Logan, West Virginia 25601

CERTIFIED

945726

CLAIM CHECK  
NO.

HOLD

DATE

8/6/80  
1ST NOTICE

8-2380  
RETURN  
8-2380

Detached from  
PS Form 3849-A  
May 1979

PS Form 3811, Aug 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

<p>1. SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.</p>							
<p>1. The following service is requested (check one)</p> <p><input type="checkbox"/> Show to whom and date delivered _____</p> <p><input type="checkbox"/> Show to whom, date, and address of delivery _____</p> <p><input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered _____</p> <p><input type="checkbox"/> RESTRICTED DELIVERY Show to whom, date, and address of delivery, \$ _____</p> <p>(CONSULT POSTMASTER FOR FEES)</p>							
<p>2. ARTICLE ADDRESSED TO  <i>Thomas A. Tomlin</i>  <i>Box 813</i>  <i>Edgar, West Va.</i></p>							
<p>3. ARTICLE DESCRIPTION <i>256A</i></p> <table border="1"> <tr> <td>REGISTERED NO.</td> <td>CERTIFIED NO.</td> <td>INSURED NO.</td> </tr> <tr> <td><i>945726</i></td> <td></td> <td></td> </tr> </table>		REGISTERED NO.	CERTIFIED NO.	INSURED NO.	<i>945726</i>		
REGISTERED NO.	CERTIFIED NO.	INSURED NO.					
<i>945726</i>							
<p>4. (Always obtain signature of addressee or agent)</p> <p>I have received the article described above</p> <p>SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent</p>							
<p>4. DATE OF DELIVERY</p>	<p>POSTMARK</p>						
<p>5. ADDRESS (Complete only if requested)</p>							
<p>6. UNABLE TO DELIVER BECAUSE</p> <p><i>Unclaimed</i></p> <p><i>MUR1237</i></p>							
<p>CLERK'S INITIALS</p> <p><i>A</i></p>							



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 5, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Thomas A. Tomblin, Treasurer  
1976 Logan County Democratic  
Campaign Committee  
Box 813  
Logan, West Virginia 25601

Re: MUR 1227

Dear Mr. Tomblin:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, found evidence that your committee may have violated sections 433 and 434 of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, the committee's distribution of approximately \$19,350 in 1976 to precinct captains for election day expenses may have obligated the committee to register and file reports with the Commission.

An investigation has been conducted and after considering the circumstances of this matter, the Commission determined, on August 4, 1980, that there is reason to believe that your committee violated 2 U.S.C. §§ 433 and 434 and further determined to take no further action in this matter. Accordingly, the file has been closed.

Please be advised that the 1979 amendments to the Act have amended the definition of "political committee" to include any local committee of a political party which receives contributions aggregating in excess of \$5,000 during a calendar year, or makes payments exempted from the definition of "contribution" or "expenditures" (as defined at 2 U.S.C. § 431(8) and 431(9)) aggregating in excess of \$5,000 during a calendar year, or makes contributions aggregating in excess of \$1,000 during a calendar year or makes expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(C). All committees which meet the definition of a political committee under the Act are required to register and report with the Commission.

The payment of "get-out-the-vote" expenses by a political party committee may qualify the committee as a political committee under the Act. Get-out-the-vote expenses should be allocated on a reasonable basis between federal and non-federal activity during a federal election year. 11 C.F.R. § 106.1(e). If a political party committee makes payments exempt from the definition of "contribution" or "expenditure" (2 U.S.C. §§ 431(8) and (9)),

Letter to: T. Tomblin  
Page 2

allocable to federal candidates, in excess of \$5,000 per calendar year, or makes expenditures for other get-out-the-vote activities, allocable to federal candidates not exempted from the definition of "contribution" or "expenditure" (2 U.S.C. §§ 431(8) and (9)) in excess of \$1,000 per calendar year, then the committee qualifies as a political committee under the Act, and must register with the Commission within 10 days of becoming a political committee.

A report on the Commission's finding is enclosed for your information.

If you have any questions please contact Maura White, the staff member assigned to this matter, at 202/523-4060.

Sincerely,

  
Max L. Friedersdorf  
Chairman



FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE August 5, 1980

MUR NO. 1227

STAFF MEMBER(S) & TEL. NO.  
Maura White/ David Branch

RESPONDENT 1976 Logan County Democratic  
Campaign Committee

(202) 523-4060

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On March 28, 1980, the Reports Analysis Division ("RAD") referred the name of the 1976 Logan County Democratic Campaign Committee to the Office of General Counsel for failure to register with, and report to, the Commission in violation of 2 U.S.C. §§ 433 and 434.

FACTUAL BASIS & LEGAL ANALYSIS

1976 Logan County Democratic Campaign Committee  
("Logan County Committee")

Audit received a copy of a West Virginia state disclosure report for the Logan County Committee during the course of an audit of the West Virginia State Democratic Telethon Committee. Audit's review of the West Virginia state report revealed that a fundraising event was held on October 28, 1976, which netted proceeds of \$19,350. The reports further indicated that the proceeds of the event were disbursed by the Logan County Committee to direct coordinators for distribution to precinct captains for the purposes set forth in Chapter 3, Article 8, Section 9 of the Code of West Virginia. This section of the code deals with expenditures of a political committee, a portion of which deals specifically with election day expenses. Based on this information, it is the opinion of Audit that the distribution of funds was made for GOTV activities.

B. ANALYSIS

The Commission has recognized in Advisory Opinion 1978-50 that GOTV and voter registration expenditures are considered administrative expenses and may be allocated in the same manner as administrative expenses. Pursuant to 11 C.F.R. § 106.1(e) party committees and other political committees which have established federal campaign committees shall allocate administrative expenses on a reasonable basis between their federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis. The Commission has further recognized in Advisory Opinions 1978-50, 1978-28, 1978-102, 1978-10, Re: AOR 1978-72, and its September 1977 guideline, that various methods may be "reasonable" for the allocation of the GOTV expenses of political parties. Additionally, the Commission has held in AO 1978-28 that the expenses of a political party organization for GOTV drives in a federal election year are, at least in part, for the purpose of influencing the election of persons to federal office even though the drive is not conducted expressly or exclusively on behalf of federal candidates. See also AO 1978-50 and AO 1978-10.

2 U.S.C. § 431(e)(5)(E) and 11 C.F.R. § 100.4(b)(7) (recodified at 2 U.S.C. § 431(8)(B)(v) and § 100.7(b)(9)) exclude from the definition of contribution the payment by a state or local committee of a political party of the costs of preparation, display, or mailing or other distribution incurred by the committee with respect to a printed slate card, sample ballot, palm card, or other printed listing of three or more candidates for any public office for which an election is held in the state in which the committee is organized.

2 U.S.C. § 431(f)(4)(G) and 11 C.F.R. § 100.7(b)(11) (recodified at 2 U.S.C. § 431(9)(B)(iv) and 11 C.F.R. § 100.8(b)(10)) exclude from the definition of expenditure the payment, by a state or local committee of a political party, of the costs of preparation, display, or mailing or other distribution incurred by the Committee with respect to a printed slate card, sample ballot, palm card, or other printed listing of three or more candidates for any public office for which an election is held in the state in which the committee is organized. The 1979 amendments to the Act further exclude from the definition of contribution, and expenditure, the payment by a state or local political party committee of the costs of campaign materials (such as pins, bumper stickers, handbills, brochures, party tabloids, and yard signs) used by such committee in connection with volunteer activities on behalf of the nominees of such party provided that such payments are not for the costs of campaign materials or activities used in connection with any broadcasting, newspaper, magazine, billboard, direct mail, or similar type of general public communication or political advertising. 2 U.S.C. § 431(8)(B)(x) and 11 C.F.R. § 100.7(b)(15) and 2 U.S.C. § 431(9)(B)(viii) and 11 C.F.R. § 100.8(b)(16).

- 3 -

Prior to the passage of the 1979 amendments to the Act, a political committee was defined to include any committee, club, organization, or other groups of persons which received contributions or made expenditures during a calendar year in an aggregate amount exceeding \$1,000. 2 U.S.C. § 431(d) and 11 C.F.R. § 100.14. The 1979 amendments to the Act, however, amended the definition of political committee to include the local committee of a political party which receives contributions aggregating in excess of \$5,000 during a calendar year, or makes payments exempted from the definition of contribution or expenditure aggregating in excess of \$5,000 per year, or makes contributions or expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(C) and 11 C.F.R. § 100.5(c). State party committees are defined to be political committees under the Act if they receive contributions or makes expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(A) (former 2 U.S.C. § 431(d)). 2 U.S.C. § 434 requires that the treasurer of a political committee file reports of receipts and expenditures with the Commission. 2 U.S.C. § 433 requires that each political committee file a statement of organization with the Commission.

The application of any of the approved reasonable methods of allocation of GOTV activity would most probably result in a determination that the respondent committee, the Logan County Committee, was a political committee under the Act prior to the 1979 amendments to the Act. Because of the length of time that has elapsed (4 years) since the Logan County Committee engaged in activity which may have required it to register and report with the Commission, and because we know of no other activity which would bring the Committee under the Commission's jurisdiction, and as the 1979 Amendments have exempted additional activity from the definition of contribution and expenditure, the General Counsel recommends that the Commission find reason to believe that the 1976 Logan County Democratic Campaign Committee violated 2 U.S.C. §§ 433 and 434 and take no further action.

Based on the foregoing analysis, the Federal Election Commission has found:

1) Reason to Believe that the 1976 Logan County Democratic Campaign Committee violated 2 U.S.C. §§ 433 and 434 and determined to take no further action in this matter.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*  
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*  
DATE: AUGUST 4, 1980  
SUBJECT: MUR 1227 - Memorandum to the Commission  
dated 7-31-80, with revised letter.  
Received in OCS 7-31-80, 3:11

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 2:00, August 1, 1980.

There were no objections to the revised letter to the West Virginia State Democratic Executive Committee as attached to the above-named memorandum.

However, we transmit herewith a copy of Commissioner Aikens' comments on the letter to the West Virginia State Democratic Executive Committee, in which she continues to express her dissatisfaction with the letter.

Attachment as noted



FEDERAL ELECTION COMMISSION

1225 K STREET N.W.  
WASHINGTON D.C. 20543

80 AUG 4 P 3: 13

DATE AND TIME OF TRANSMITTAL FRIDAY, 8-1-80  
2:00

Commissioner FRIEDERSDORF, AIKENS, TIERNAN, MCCARRY, REICHE, HARRIS

RETURN TO THE OFFICE OF COMMISSION SECRETARY BY: MONDAY, AUGUST 4, 1980  
2:00

MUR No. 1227 - Memorandum to the Commission dated 7-31-80, with  
revised letter to the West Virginia State  
Democratic Executive Committee

( ) I object to the recommendation in the attached report.

COMMENTS: Will not hold this by objecting ~~and~~ but  
proposed deletion does not resolve first ~~commentary~~  
There is a specific def. of state & local party  
committee - Why can't we use it?

Date 8-4-80

Signature J. Aikens

OBJECTIONS, SIGNED AND DATED, MUST BE RECEIVED IN THE COMMISSION SECRETARY'S OFFICE NO LATER THAN THE DATE AND TIME SHOWN ABOVE OR THE MATTER WILL BE DEEMED APPROVED. PLEASE RETURN ALL PAPERS TO THE OFFICE OF THE SECRETARY TO THE COMMISSION.



July 31, 1980

MEMORANDUM TO: Marjorie W. Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 1227

Please have the attached Memo distributed to the  
Commission on a 24 hour no-objection basis. Thank you.





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

80 JUL 31 P 3: 11

July 31, 1980

MEMORANDUM TO: The Commission

FROM: Charles N. Steele  
General Counsel *[Signature]*

SUBJECT: MUR 1227

On July 17, 1980, a First General Counsel's Report was circulated to the Commission in MUR 1227 on a 48 hour objection basis. Attached is a copy of a revised letter to the West Virginia State Democratic Executive Committee which the Office of General Counsel recommends be sent in lieu of the letter that was circulated with the First General Counsel's Report.

The revised letter amends only the second sentence of the third paragraph of page one. The word "club" has been deleted for clarity and the word "committee" has been inserted as it was previously erroneously omitted. This revision is recommended in view of the fact that the West Virginia State Democratic Executive Committee is a state party committee. The amended sentence therefore reads as follows:

A political committee, in the case of a state party committee, is defined to mean any committee, association, or other groups of persons which receives contributions to influence federal elections aggregating in excess of \$1,000 during a calendar year or makes expenditures to influence federal elections aggregating in excess of \$1,000 during a calendar year.





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Robert Burke, Treasurer  
West Virginia State Democratic  
Executive Committee  
2106 Kanawha Blvd., E.  
Charleston, West Virginia 25311

Re: MUR 1227

Dear Mr. Burke:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, found evidence that your committee may have violated sections 433 and 434 of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, the committee's transfer of \$3,500 in 1976 and \$40,900 in 1978 to county committees and individuals for election day expenses may have obligated the committee to register and file reports with the Commission.

An investigation has been conducted and after considering the circumstances of this matter, the Commission determined, on , 1980, that there is reason to believe that your committee violated 2 U.S.C. §§ 433 and 434. A report on the Commission's finding is enclosed for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

All committees which meet the definition of political committee under the Act are required to register and report with the Commission. A political committee, in the case of a state party committee, is defined to mean any committee, association, or other group of persons which receives contributions to influence federal elections aggregating in excess of \$1,000 during a calendar year or makes expenditures to influence federal elections aggregating in excess of \$1,000 during a calendar year.

The payment of "get-out-the-vote" expenses by a political party committee may qualify the committee as a political committee under the Act. Get-out-the-vote expenses should be allocated on a reasonable basis between federal and non-federal activity during a federal election year. 11 C.F.R. § 106.1(e).

Letter to: R. Burke  
Page 2

Please submit answers to the enclosed questions within 15 days of receipt of this letter.

In the absence of additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) (formerly § 437g(a)(3)(B)) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions please contact Maura White, the staff member assigned to this matter, at 202-523-4060.

Sincerely,

Enclosure



FEDERAL ELECTION COMMISSION  
WASHINGTON D.C. 20463

CNS

cc: White

MEMORANDUM TO: CHARLES STEELE *me*  
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *me*  
DATE: JULY 23, 1980  
SUBJECT: MUR 1227 - First General Counsel's Report  
dated 7-17-80; Received in OCS 7-17-80,  
12:53

The above-named document was circulated on a tally vote basis at 4:00, July 17, 1980.

As of 12:00, July 23, 1980, this office has received four approvals and one conditional approval. One Commissioner has not returned a vote.

Commissioner Aikens approves with the understanding that the letter to the West Virginia State Democratic Executive Committee will be changed and recirculated.

Since Recommendation #3 in the First General Counsel's Report on MUR 1227 states ~~"Approve the attached letters"~~, the certification cannot be prepared if one of the letters is to be changed.

Please advise as to how this matter should be handled.

cc: Commissioner Aikens

42 HOUR TALLY SHEET



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

80 JUL 22 P 4: 30

Date and Time Transmitted: THURSDAY, 7-17-80  
4:00

Commissioner FRIEDERSDORF, AIKENS, TIERNAN, MCCARRY, SEICHE, HARRIS

RETURN TO OFFICE OF COMMISSION SECRETARY BY: TUESDAY, JULY 22, 1980  
4:00

MUR No. 1227 - First General Counsel's Report dated 7-17-80

- (✓) I approve the recommendation  
( ) I object to the recommendation

COMMENTS: Letter to Dem State Comm  
to be changed & reinserted

Date: 7-22-80 Signature: J. D. Aikens

THE OFFICE OF GENERAL COUNSEL WILL TAKE NO ACTION IN THIS MATTER UNTIL THE APPROVAL OF FOUR COMMISSIONERS IS RECEIVED. PLEASE RETURN ALL PAPERS NO LATER THAN THE DATE AND TIME SHOWN ABOVE TO THE OFFICE OF COMMISSION SECRETARY. ONE OBJECTION PLACES THE ITEM ON THE EXECUTIVE SESSION AGENDA.



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1227
West Virginia Democratic Executive	)	
Committee	)	
1976 Logan County Democratic Campaign	)	
Committee	)	
Committee for a Better Logan County	)	
Mingo County Democratic Executive	)	
Committee	)	
Independent Democrats Committee	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 4, 1980, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1227:

1. Find REASON TO BELIEVE that the 1976 Logan County Democratic Campaign Committee, Committee for a Better Logan County, Mingo County Democratic Executive Committee, and the Independent Democrats Committee violated 2 U.S.C. §§ 433 and 434 and take no further action in this matter.
2. Find REASON TO BELIEVE that the West Virginia State Democratic Executive Committee violated 2 U.S.C. §§ 433 and 434.
3. Approve the letters as attached to the First General Counsel's Report dated July 17, 1980, subject to amendment of the letter to the West Virginia

(Continued)

CERTIFICATION

Page 2

MUR 1227

First General Counsel's Report

Dated July 17, 1980

State Democratic Executive Committee  
as circulated with the General  
Counsel's July 31, 1980 memorandum.

Voting for this determination were Commissioners Aikens,  
Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

Attest:

8/4/80

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary to the Commission

Received in Office of the Commission Secretary: 7-17-80, 12:53  
Circulated on tally vote basis: 7-17-80, 4:00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mw*  
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*  
DATE: JULY 23, 1980  
SUBJECT: MUR 1227 - First General Counsel's Report  
dated 7-17-80; Received in OCS 7-17-80,  
12:53

The above-named document was circulated on a tally vote basis at 4:00, July 17, 1980.

As of 12:00, July 23, 1980, this office has received four approvals and one conditional approval. One Commissioner has not returned a vote.

Commissioner Aikens approves with the understanding that the letter to the West Virginia State Democratic Executive Committee will be changed and recirculated.

Since Recommendation #3 in the First General Counsel's Report on MUR 1227 states "Approve the attached Letters", the certification cannot be prepared if one of the letters is to be changed.

Please advise as to how this matter should be handled.

cc: Commissioner Aikens



24 HOUR TALLY SHEET



FEDERAL ELECTION COMMISSION

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

80 JUL 22 P 4: 30

Date and Time Transmitted: THURSDAY, 7-17-80  
4:00

Commissioner FRIEDERSDORF, AIKENS, TIERNAN, MCGARRY, REICHE, HARRIS

RETURN TO OFFICE OF COMMISSION SECRETARY BY: TUESDAY, JULY 22, 1980  
4:00

MUR No. 1227 - First General Counsel's Report dated 7-17-80

- ☒ I approve the recommendation  
☐ I object to the recommendation

COMMENTS: Letter to Dem State Comm  
to be changed & reinserted

Date: 7-22-80 Signature: J. W. Aikens

THE OFFICE OF GENERAL COUNSEL WILL TAKE NO ACTION IN THIS MATTER UNTIL THE APPROVAL OF FOUR COMMISSIONERS IS RECEIVED. PLEASE RETURN ALL PAPERS NO LATER THAN THE DATE AND TIME SHOWN ABOVE TO THE OFFICE OF COMMISSION SECRETARY. ONE OBJECTION PLACES THE ITEM ON THE EXECUTIVE SESSION AGENDA.



July 17, 1980

MEMORANDUM TO: Marjorie W. Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 1227

Please have the attached First GC Report distributed to the Commission on a 48 hour tally basis. Thank you.

FEDERAL ELECTION COMMISSION  
1325 K Street, N.W.  
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION

7-17-80

MUR # 1227

STAFF MEMBER(S)  
M. White

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: West Virginia Democratic Executive Committee, 1976 Logan County Democratic Campaign Committee, Committee for a Better Logan County, Mingo County Democratic Executive Committee, Independent Democrats Committee

RELEVANT STATUTE: 2 U.S.C. §§ 433 and 434

INTERNAL REPORTS CHECKED: Public Records

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

On March 28, 1980, the Reports Analysis Division ("RAD") referred the names of the West Virginia State Democratic Executive Committee, 1976 Logan County Democratic Campaign Committee, Committee for a Better Logan County, Mingo County Democratic Executive Committee, and the Independent Democrats Committee to the Office of General for failure to register with, and report to, the Commission in violation of 2 U.S.C. §§ 433 and 434 (Attachment 1).

During the course of performing an audit of the West Virginia State Democratic Telethon Committee, the Audit Division ("Audit") noted that these five committees may have expended funds in excess of \$1,000 for get-out-the-vote ("GOTV") and voter registration efforts. None of the five committees has received any letters or notifications, from the Commission, to date, in regard to reporting requirements.

FACTUAL BASIS & LEGAL ANALYSIS

A. (1) West Virginia State Democratic Executive Committee  
("Executive Committee")

During the audit of the West Virginia State Democratic Telethon Committee, Audit received copies of the West Virginia state reports and records of the Executive Committee.

80 JUL 17  
P12: 53

The Executive Committee conducts the non-federal activities of the Democratic Party of West Virginia.

Audit's review of the state reports of the Executive Committee revealed that during November 1976 ten transfers totalling \$3,500 were made to two unregistered county committees and eight individuals for "election day expenses." Also, during October, 1978, 106 transfers totalling \$40,900 were made to 55 unregistered county committees for the same purpose. 1/

It is the opinion of Audit that the transfers were made for GOTV activity. Additionally, it should be noted that one of the 106 transfers made in October 1978 totalling \$1,100 was made to the Kanawha County Democratic Executive Committee, a registered committee. Moreover, the Kanawha County Democratic Executive Committee also reported the receipt of a \$1,000 transfer from the Executive Committee during November 1978. Although we have no information as to the purpose of this transaction, it appears that this transfer may have been for "election day expenses" as well.

(2) 1976 Logan County Democratic Campaign Committee  
(Logan County Committee)

As with the Executive Committee, audit received a copy of a West Virginia state disclosure report for the Logan County Committee during the course of an audit of the West Virginia State Democratic Telethon Committee. Audit's review of the West Virginia state report revealed that a fundraising event was held on October 28, 1976, which netted proceeds of \$19,350. The report further indicated that the proceeds of the event were disbursed by the Logan County Committee to district coordinators for distribution to precinct captains for the purposes set forth in Chapter 3, Article 8, Section 9 of the Code of West Virginia. This section of the code deals with expenditures of a political committee, a portion of which deals specifically with election day expenses. Based on this information, it is the opinion of Audit that the distribution of funds was made for GOTV activities.

1/ Audit noted that the official of the Telethon Committee who presented the state reports of the Executive Committee to them, stated that the Executive Committee had sought guidance from the Commission with respect to the handling of "election day expenses," and based upon information received, attached a memorandum to each transfer check informing the recipient committees and individuals of the restricted use of the amounts transferred. Documentation concerning the communication with the Commission was not retained and the official was unable to provide further information concerning it.

- (3) Committee for a Better Logan County
- (4) Mingo County Democratic Executive Committee
- (5) Independent Democrats Committee

Audit performed a cursory review of disclosure reports filed by federal candidates in West Virginia during the course of the audit of the West Virginia State Democratic Telethon Committee. As a result of this review, it was determined that during May 1978 the Keep Nick Rahall In Congress Committee, a federal committee, made a transfer of \$5,000 to the Committee for a Better Logan County, two transfers totalling \$4,000 to the Mingo County Democratic Executive Committee, and two transfers totalling \$5,000 to the Independent Democrats Committee. The particulars of these expenditures were listed as "precinct organization and election day expense."

On December 18, 1979, RAD mailed the Keep Nick Rahall In Congress Committee a request for additional information ( RFAI") concerning the \$14,000 reported as expenditures in May 1978 for election day expenses; the committee's response stated that the "monies 'transferred' to the three political committees were to help defray the expenses the Committee had in the three counties for such things as signs, sample ballots, expenses for vehicles taking voters to the polls, and a 'get out the vote' type operation."

#### B. ANALYSIS

The Commission has recognized in Advisory Opinion 1978-50 that GOTV and voter registration expenditures are considered administrative expenses and may be allocated in the same manner as administrative expenses. Pursuant to 11 C.F.R. § 106.1(e) party committees and other political committees which have established federal campaign committees shall allocate administrative expenses on a reasonable basis between their federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis. The Commission has further recognized in Advisory Opinions 1978-50, 1978-28, 1978-102, 1978-10, Re: AOR 1978-72, and its September 1977 guideline, that various methods may be "reasonable" for the allocation of the GOTV expenses of political parties. Additionally, the Commission has held in AO 1978-28 that the expenses of a political party organization for GOTV drives in a federal election year are, at least in part, for the purpose of influencing the election of persons to federal office even though the drive is not conducted expressly or exclusively on behalf of federal candidates. See also AO 1978-50 and AO 1978-10.

2 U.S.C. § 431(e)(5)(E) and 11 C.F.R. § 100.4(b)(7) (recodified at 2 U.S.C. § 431(8)(B)(v) and § 100.7(b)(9)) exclude from the definition of contribution the payment by a state or local committee of a political party of the costs of preparation, display, or mailing or other distribution incurred by the committee with respect to a printed slate card, sample ballot, palm card, or other printed listing of three or more candidates for any public office for which an election is held in the state in which the committee is organized.



2 U.S.C. § 431(f)(4)(G) and 11 C.F.R. § 100.7(b)(11) (re-codified at 2 U.S.C. § 431(9)(B)(iv) and 11 C.F.R. § 100.8(b)(10)) exclude from the definition of expenditure the payment, by a state or local committee of a political party, of the costs of preparation display, or mailing or other distribution incurred by the Committee with respect to a printed slate card, sample ballot, palm card, or other printed listing of three or more candidates for any public office for which an election is held in the state in which the committee is organized. The 1979 amendments to the Act further exclude from the definition of contribution, and expenditure, the payment by a state or local political party committee of the costs of campaign materials (such as pins, bumper stickers, handbills, brochures, party tabloids, and yard signs) used by such committee in connection with volunteer activities on behalf of the nominees of such party provided that such payments are not for the costs of campaign materials or activities used in connection with any broadcasting newspaper, magazine, billboard, direct mail or similar type of general public communication or political advertising. 2 U.S.C. § 431(8)(B)(x) and 11 C.F.R. § 100.7(b)(15) and 2 U.S.C. § 431(9)(B)(viii) and 11 C.F.R. § 100.8(b)(16).

Prior to the passage of the 1979 amendments to the Act a political committee was defined to include any committee club, organization, or other groups of persons which received contributions or made expenditures during a calendar year in an aggregate amount exceeding \$1,000. 2 U.S.C. § 431(d) and 11 C.F.R. § 100.14. The 1979 amendments to the Act, however, amended the definition of political committee to include the local committee of a political party which receives contributions aggregating in excess of \$5,000 during a calendar year, or makes payments exempted from the definition of contribution or expenditure aggregating in excess of \$5,000 per year, or makes contributions or expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(C) and 11 C.F.R. § 100.5(c). State party committees are defined to be political committees under the Act if they receive contributions or makes expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(A) (former 2 U.S.C. § 431(d)). 2 U.S.C. § 434 requires that the treasurer of a political committee file reports of receipts and expenditures with the Commission. 2 U.S.C. § 433 requires that each political committee file a statement of organization with the Commission.

The application of any of the approved reasonable methods of allocation of GOTV activity would most probably result in a determination that at least two of the respondent committees, the Executive Committee and the Logan County Committee, were political committees under the Act prior to the 1979 amendments to the Act. Subsequent to these amendments, however, the same level of activity by the Committee for a Better Logan County, the Mingo County Democratic Executive Committee, and the Independent Democrats Committee is not likely to cause the respondent committees

to meet the definition of political committee. There is no evidence of any other activity by the Committee for a Better Logan County, Mingo County Democratic Executive Committee, and the Independent Democrats Committee, which would bring them under the jurisdiction of the Commission. Because of these considerations and because it would not be in the Commission's interest to require these committees to register and report to the Commission as a result of activity which may no longer be sufficient to qualify the respondent committees as political committees under the Act, the General Counsel recommends that the Commission find reason to believe that the Committee for a Better Logan County, Mingo County Democratic Executive Committee, and the Independent Democrats Committee violated 2 U.S.C. §§ 433 and 434 and take no further action in this matter. Because of the length of time that has elapsed (4 years) since the Logan County Committee engaged in activity which may have required it to register and report with the Commission, and because we know of no other activity which would bring the Committee under the Commission's jurisdiction, the General Counsel recommends that the Commission find reason to believe that the 1976 Logan County Democratic Campaign Committee violated 2 U.S.C. §§ 433 and 434 and take no further action. It is recommended in regard to all respondent committees that they be instructed that should they engage in any activity which would qualify them as a "political committee" under the Act, they must register and report to the Commission. As it appears that the election day expenses of the West Virginia State Democratic Executive Committee during 1978 were for GOTV activities and the amount transferred to county committees during 1978 was substantial, and because the committee transferred \$2,100 to a registered committee (the Kanawha County Democratic Executive Committee) during 1978, the General Counsel recommends that the Commission find reason to believe that the West Virginia State Democratic Executive Committee violated 2 U.S.C. §§ 433 and 434.

#### RECOMMENDATIONS

1. Find reason to believe that the 1976 Logan County Democratic Campaign Committee, Committee for a Better Logan County, Mingo County Democratic Executive Committee, and the Independent Democrats Committee violated 2 U.S.C. §§ 433 and 434 and take no further action in this matter.
2. Find reason to believe that the West Virginia State Democratic Executive Committee violated 2 U.S.C. §§ 433 and 434.
3. Approve the attached letters.

#### Attachments

1. Referrals from RAD
2. Letters (5)



ATTACHMENT #1



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

D-675

MEMORANDUM

MARCH 28, 1980

TO : OFFICE OF GENERAL COUNSEL  
THROUGH: ORLANDO B. POTTER *OBP*  
FROM : TOM HASSELHORST *TH*  
SUBJECT: FIVE REFERRALS--WEST VIRGINIA COMMITTEES

Please find attached five referrals for the following committees;

West Virginia Democratic Executive Committee (WV)  
1976 Logan County Democratic Campaign Committee (WV)  
Committee for a Better Logan County (WV)  
Mingo County Democratic Executive Committee (WV)  
Independent Democrats Committee (WV)

These committees are unregistered. During the course of performing its duties, the Audit Division noted that these committees may have expended funds for get-out-the-vote and voter registration efforts.

Because of the amount of funds involved, the Audit Division referred these matters to the Reports Analysis Division for further action as necessary.

The Reports Analysis Division reviewed the matters along with the correspondence between the Audit Division and the Office of General Counsel. We noted that in handling these matters, we should receive further guidance from your Office and/or the Commission. The guidance was felt necessary because:

1. The policy regarding possible allocation of GOTV and voter registration expenses was formulated through an Advisory Opinion (1978-10).
2. The method of allocation presented in AO 1978-10 does not necessarily apply to unregistered committees which have single accounts.
3. The method which may be available to these committees for determining the proper allocation necessary has not been fully addressed by the Commission. This method is the ballot position method which involves establishing a proportion for allocation based upon the number of Federal candidates and total candidates within the area of the activity. However, the relevant AO's are inconsistent in the formulation and application of the methods.

Specifically:

- a) In some cases, the proportion is based upon the number of candidates on the ballot; in other cases, the proportion is based upon the number of offices on the ballot.
  - b) In some cases the number of Federal offices had to receive an additional weighting prior to the determination of the proportion; in other cases, no additional weighting was required.
  - c) In one case, the number of total offices was defined in terms of Federal offices and comparable State offices; in other cases, the number of total offices was defined as the total number of offices-- Federal, State, and local combined.
4. The Commission has had no opportunity to address this Division's proposals for the Regulations which involve allocation of expenses.
  5. The Division believes that we do not have the required guidance in this area to respond to these committees' questions once they have been notified of their required registration, if in fact they are required to register.

As the attached Memoranda and Memos to the File will indicate, we have attempted to receive guidance concerning allocation. Having received no guidance, we believe that this Commission and these committees will be better served were these matters to be addressed by the Commission in the form of MUR's.

In order to assist you in your consideration of these matters, we here attach relevant information regarding allocation of such expenses, as follows on the next pages.

Advisory Opinions

Attachment

AO 1978-10

1

Statement of decision that voter registration and get-out-the-vote expenses may be allocated between Federal and non-Federal accounts. Please note that this opinion states that these expenses may be allocated in the same manner as other general party expenditures. However, the methods provided in 11 CFR 106.1(e) and the September, 1977, guideline are predicated upon the existence of segregated accounts. Thus, it would appear that a "ballot position" method would be required.

AO 1976-72

2

This opinion provides for a method of allocation of party administrative expenses which is based upon ballot position, i.e. ratio of Federal offices on the ballot to the total number of offices on the ballot. However, the number of Federal offices is required to receive additional weighting than do the other offices. The amount of additional weighting is not specified.

AO 1978-28

3

This opinion addresses the question of allocation for an unregistered committee which registered with FEC in order to obtain the AO on the question. The Commission stated that a 10% allocation for Federal offices was reasonable in a situation in which there are on the ballot:

1. 1 Federal candidate; and
2. 6 Statewide offices; and
3. 7 County wide offices; and
4. 13 Legislative offices.

In Footnote #2 in the opinion, it is stated that the following method would also be reasonable:

The ratio of number of ballot positions for Federal office in next election to the number of positions for comparable State offices in the next election.

Please note that no weighting for Federal offices appears to be required as this method is written, and that the only other offices considered in the formula are "comparable State offices."

AO 1978-102

4

This opinion involves allocation for such expenses made by a union. The ballot position method is provided as follows:

In this situation the Commission is of the opinion that a reasonable basis for allocation would be to determine the ratio of the number of Federal candidates seeking election in the areas reached by the announcement, to the total number of all 1978 candidates--Federal, State, and local--in the same area...

Please note that no additional weighting is required in this situation. However, the ratio is based upon the number of

Page Four

Federal candidates to all candidates, and not the number of Federal offices on the ballot to the number of all offices on the ballot. Further, the number of local candidates is taken into account, whereas this was not included in AO 1978-28, Footnote #2.

See Next Page for Memoranda and Memos to the File List

Memoranda & Memos to the FileAttachment

1. February 5, 1979 5  
Registration of Political Committee  
Bob Costa/Joe Stoltz to Bill Oldaker
2. February 12, 1979 6  
Unregistered Political Organization -  
Bob Costa/Joe Stoltz to Tom Haselhorst
3. May 29, 1979 7  
Registration of Political Committee-West Virginia  
William Oldaker to Bob Costa  
  
Please note that this memo calls for an allocation method  
to be devised. A proposal for this was submitted to OGC  
on July 13, 1979. See below.
4. May 31, 1979 8  
Registration of Political Committee  
Bob Costa/Joe Stoltz to Tom Haselhorst
5. July 13, 1979 9  
Allocation of Expenses by Party Committees  
Bob Costa/Tom Haselhorst to William Oldaker
6. August 20, 1979 10  
WV State Democratic Executive Committee-unregistered  
Memo to the File: Werfel
7. September 11, 1979 11  
Note from Orlando B. Potter  
  
The letters were prepared and submitted to Potter for  
signature. This is his note to RAD regarding required  
backup for the letters.
8. November 7, 1979 12  
Allocation/West Virginia Committees  
Memo to the File: Greevy
9. January 22, 1980 13  
Allocation  
Memo to the File: Greevy
10. January 25, 1980 14  
Comments on Revision of the Regulations  
Tom Haselhorst to Office of General Counsel

Only that portion involving 11 CFR 106.1(e) is here included.

THE REFERRALS ARE ATTACHED AS ATTACHMENTS 15-19

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

RAD

802-72

REPORTS ANALYSIS REFERRAL SHEET

DATE March 23, 1980

ANALYST Dug Greevy

Aug 3/11

TO: Office of General Counsel

TEAM CHIEF Bobby Werfel

THROUGH: STAFF DIRECTOR

COMPLIANCE REVIEW OK

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE:

West Virginia State Democratic Executive Committee

TREASURER:

ADDRESS:

2106 Kanawha Boulevard, E  
Charleston, WV 25311

AFFILIATE(S):

ALLEGATION(S):

Unregistered Political Committee

CITE:

2 U.S.C. 433 & 434

ATTACHMENT(S)

A & B

DATE INITIATED: 5/31/79

MANNER IN WHICH REVIEW WAS INITIATED:

Referral from Audit Division

☐ Normal Review

☐ Other:

☐ Special Project:

ATTACHMENT

4



**REPORTS:** All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM \_\_\_\_\_ TO \_\_\_\_\_

TOTAL RECEIPTS \$ \_\_\_\_\_ TOTAL EXPENDITURES \$ \_\_\_\_\_

CASH ON HAND \$ \_\_\_\_\_ DEBTS \$ \_\_\_\_\_

**HISTORY:**

RESULTS OF REVIEW:

*ATTACHMENT*

None

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

*ATTACHMENT*

None

REASON(S) FOR REFERRAL:

*ATTACHMENT*

See Cover Memo: Haselhorst to OGC

OTHER PENDING ACTIONS INITIATED BY RAD:

*ATTACHMENT*

None

OTHER RELEVANT INFORMATION:

*ATTACHMENT*

Letter Prepared to Send to Committee

Orlando Potter's comment on Prepared Letter, 9/11/79

Memo to the File: Greevy, 11/7/79

Note: Attachment B discovered after preparation of Attachment C

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

None



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

February 5, 1979

MEMORANDUM

TO : BILL OLDAKER

THROUGH : ORLANDO B. POTTER *OBP*  
STAFF DIRECTOR

FROM : *AK* BOB COSTA/JOE STOLTZ *JTS*

SUBJECT : REGISTRATION OF POLITICAL COMMITTEE

The Audit staff recently completed an audit of the West Virginia State Democratic Telethon Committee ("the Telethon Committee"). Attached is a copy of the audit report which will be forwarded to the Commission subsequent to your analysis of the matters described below. (Attachment #1). The audit report contains the opinion that the Telethon Committee is not a political committee as defined by Section 431(d) of Title 2 of the United States Code. However, during the audit, a Telethon Committee official presented for the Audit staff's review the State reports and records of the West Virginia State Democratic Executive Committee ("the Executive Committee") (Attachment #2), an unregistered committee established to conduct non-Federal activities of the Democratic Party of West Virginia.

It is the opinion of the Audit Division, based upon the review of the records of the Executive Committee as outlined below, that the Executive Committee has engaged in Federal activity which would require it to register and report with the Commission.

Registration and Reporting By a Political Committee

Section 433(a) of Title 2 of the United States Code requires each political committee which anticipates receiving contributions or making expenditures during the calendar year in an aggregate amount exceeding \$1,000 to file with the Commission a statement of organization within 10 days following the date of the anticipation.



Section 434(a) of Title 2 of the United States code requires the treasurer of a political committee to file with the Commission reports of receipts and expenditure on prescribed or approved forms.

Our review of the State reports (Attachment #2) and records of the Executive Committee revealed that during November, 1976 ten (10) transfers totaling \$3,500.00 were made to two (2) unregistered county committees and eight (8) individuals for "election day expenses". Further, during October, 1978, 106 transfers totaling \$40,900.00 were made to 55 unregistered county committees for the same purpose.

According to the official that had presented the records, the Executive Committee had sought guidance from the Commission with respect to the handling of the "election day expense", and based upon information received, attached a memoranda to each transfer check informing the recipient committees and individuals of the restricted use of the amounts transferred (Attachment 3). Documentation concerning the communication with the Commission was not retained, and the official was unable to provide further information concerning it.

The official was of the opinion that handling the transfers in the above manner would exempt the Executive Committee from coming within the jurisdiction of the Commission.

It is the opinion of the Audit staff, based upon the information presented, that the transfers had been made for Get-Out-The-Vote activities. As such, according to Advisory Opinion 1978-10, the Executive Committee would normally be required to allocate the activity between Federal and non-Federal elections on a reasonable basis. It appears reasonable that the portion allocated for Federal elections would exceed \$1,000, in an aggregate amount or value, during a calendar year. Therefore, the Executive Committee would normally be required to register and report under Sections 433 and 434.

This matter is referred to your office for a legal analysis and further guidance. Any questions concerning this matter should be communicated to Ray Lisi or Charles Hanshaw on extension 3-4155.

Attachment as stated



## FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

May 31, 1979

MEMORANDUM

TO: TOM HASELHORST  
FROM: *RJC* BOB COSTA/JOE STOLTZ *JS*  
SUBJECT: REGISTRATION OF POLITICAL COMMITTEE

Attached is the General Counsel's response to our memorandum of February 5, 1979, in which we requested a legal analysis concerning whether the West Virginia State Democratic Executive Committee has engaged in activities which would require it to register and file reports with the Commission. The General Counsel has concurred with the Audit staff's contention that evidence suggests the amount of activity allocable to influencing Federal elections is in excess of \$1,000. Therefore, the matter is referred to your Division for possible non-filer treatment.

Any questions concerning the matter should be communicated to Ray Lisi or Charlie Hanshaw on extension 3-4155.

Attachment as stated





FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Bob Costa

THROUGH: Orlando B. Potter *O.B.P.*  
Staff Director

FROM: William C. Oldaker *W.C.O.*  
General Counsel

SUBJECT: Registration of Political Committee--West Virginia

DATE: May 29, 1979

The Office of General Counsel has reviewed the referral and audit report concerning the West Virginia State Democratic Executive Committee ("the Committee") and the West Virginia State Democratic Telethon Committee ("the Telethon Committee"). The audit was conducted pursuant to 2 U.S.C. § 438(a)(8). Based on the information contained in these referrals, we make the following comments.

It is apparent from the Telethon Committee's lack of any Federal activity that it is not a political committee as defined by the Act. 2 U.S.C. § 431(d). Therefore, we agree with the recommendation to administratively terminate this Committee. However, the first paragraph of the Auditors' Statement should reflect that the Committee is not subject to the reporting requirements, rather than the broader statement as to jurisdiction.

In contrast, the Executive Committee appears to have made transfers for purposes which may be characterized as Get-Out-The-Vote activities to individuals and affiliated county committees. Evidence suggests that the amount of activity allocable to influencing Federal elections is in excess of \$1,000. If such is the case, we agree that the Executive Committee falls under the Act's definition of a political committee and is required to register and file reports of receipts and expenditures. The Committee's



reference to guidance provided by the Commission in a purported communication is undocumented and unclear having no import in the present analysis. Therefore, in light of AO 78-10 the language noted on the transfer instructing the transferees to use the funds in a restricted manner does not exculpate them from the reporting and registration requirements. Furthermore, the transferee Committees may become reporting entities if they have in excess of \$1,000 activity in federal elections.

Accordingly, we would suggest that an allocation method be devised pursuant to Commission regulations, and that application be made to determine the status of the Executive Committee and of the unregistered recipient committees.



# ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,  
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3

Page 12 of 13 for

Line Number 15(a)

(Use Separate Schedules for  
each numbered line)

of Candidate or Committee in Full

Kanawha County Democratic Executive Committee

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
West Virginia Democratic Executive Committee Terrace Park East Charleston, West Virginia 25311	Same Occupation Political Committee	10/23/78	\$1,100.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 1,100.00		
West Virginia Democratic Executive Committee Terrace Park East Charleston, West Virginia 25311	Same Occupation Political Committee	11/4/78	\$1,000.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 2,100.00		
Slack for Congress Committee Charleston National Plaza Charleston, West Virginia 25301	Same Occupation Political Committee	10/31/78	\$2,000.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 2,000.00		
Randolph for Senate 807 Virginia Street Charleston, West Virginia 25301	Same Occupation Political Committee	11/3/78	\$4,700.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 4,700.00		
Kanawha County Democratic Women's Club 2442 Kanawha Blvd., East Charleston, West Virginia 25311	Same Occupation Political Committee	11/4/78	\$1,000.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 1,000.00		
Citizens for Boettner Charleston National Plaza Charleston, West Virginia 25301	Same Occupation Political Committee	11/4/78	\$1,925.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 1,925.00		
AFL-CIO COPE Kanawha Blvd., East Charleston, West Virginia 25311	Same Occupation Political Committee	10/19/78	\$ 100.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 100.00		

SUBTOTAL of receipts this page (optional) . . . . . \$ 11,825.00

TOTAL this period (last page this line number only) . . . . . \$ 49,441.45



FYI :

The attached four SV's  
were referred, without backup,  
from Audit. The information  
in the Audit referrals  
has been incorporated  
into the SV notices.

---

Can audit provide any  
backup to attach to  
these letters?

It seems to me that the  
U.V.s. letter in particular  
should have more explanation  
as to the basis for  
the allegations.

ABP  
9/11



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Robert J. Burke, Treasurer  
West Virginia State Democratic  
Executive Committee  
2106 Kanawha Blvd., E  
Charleston, West Virginia 25311

Dear Mr. Burke:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. It has come to our attention that your organization may have made expenditures to influence Federal elections during calendar years 1976 and 1978. In particular, your committee appears to have made transfers totaling \$3,500 in 1976, and \$40,900 in 1978, for election day expenses.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" for calendar years 1976 and 1978. As such, your organization may be subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant information materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have any questions, please contact David Greevy, in our Reports Analysis Division at (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Thomas J. Haselhorst  
Assistant Staff Director

Enclosure

Memo to the file:

From: Bobby Werfel

Re: WV State Democratic Executive Cmte - unregistered

Date: August 20, 1979

During the course of the WV State Democratic Telethon Cmte, it was determined that the WV State Dem. Exec. Cmte. should register and report with the FEC. This recommendation was referred to OGC. OGC commented that if allocable Fed. candidate support exceeded \$1,000, the cmte. should register. They also noted that an allocation method should be devised and applied to this cmte. The above mentioned method was prepared by the Audit and Reports Analysis Divisions and as of this date is in the General Counsel's office for review.

Aug. 8 - Fred Eiland (Press Office) called me regarding an inquiry from the Press relating to this unreg. cmte. The press office released an audit of the WV Rep. State cmte. and it appears that this audit report generated questions relating to a "possible" unregistered Dem. party cmte. FE and I decided that we could not give out any information on this matter at this time.

Aug. 14 - Charlie Henshaw (audit) questioned our holding of the M letter. I explained that according to OGC's memo it appeared that we were to hold the letter until the allocation method was approved by the Commission. (FE called audit about the matter before he could reach me)

Further research of this problem indicates that application of any past allocation method used (and one of the recommended formulas) would require the cmte to register and report.

Aug. 17 - The generation of the M letter for the Exec. cmte was discussed with Tom Haselhorst. He advised that the M letters be sent to the committee and place the burden on them to register or notify us why they were not required to file with the FEC.

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

U  
RAD

501-73

### REPORTS ANALYSIS REFERRAL SHEET

DATE March 28, 1980

ANALYST Dug Greevy by 3/11

TO: Office of General Counsel

TEAM CHIEF Bobby Verfel BJK

THROUGH: STAFF DIRECTOR

COMPLIANCE REVIEW Q21

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS JH

CANDIDATE/COMMITTEE: 1976 Logan County Democratic Campaign Committee  
TREASURER: Mr. Thomas A. Tomblin  
ADDRESS: Justice Addition  
Logan, West Virginia 25601

AFFILIATE(S):

ALLEGATION(S):

CITE:

ATTACHMENT(S)

Unregistered Political Committee 2 U.S.C. 433 & 434

DATE INITIATED: 2/12/79

MANNER IN WHICH REVIEW WAS INITIATED: Referral from Audit Division

☐ Normal Review

☐ Other:

☐ Special Project:

ATTACHMENT

**REPORTS:** All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM \_\_\_\_\_ TO \_\_\_\_\_

TOTAL RECEIPTS \$ \_\_\_\_\_ TOTAL EXPENDITURES \$ \_\_\_\_\_

CASH ON HAND \$ \_\_\_\_\_ DEBTS \$ \_\_\_\_\_

**HISTORY:**

RESULTS OF REVIEW:

ATTACHMENT

None

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

None

REASON(S) FOR REFERRAL:

ATTACHMENT

See Cover Memo: Haselhorst to OGC

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

None

OTHER RELEVANT INFORMATION:

ATTACHMENT

Letter Prepared to Send to Committee  
Orlando Potter's comment on Prepared Letter, 9/11/79  
Memo to the File: Greevy, 11/7/79

B  
C  
D

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

None





## FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

February 12, 1979

MEMORANDUM

TO: TOM HASELHORST

FROM: *RC* BOB COSTA/JOE STOLTZ *JS*

SUBJECT: UNREGISTERED POLITICAL ORGANIZATION

During a recent audit of the West Virginia State Democratic Telethon Committee, the Audit staff was presented with a copy of a State disclosure report of the 1976 Logan County Democratic Campaign Committee ("the County Committee") (Attachment #1), an unregistered political organization.

Based upon a review of the report as outlined below, it is the opinion of the Audit staff that the County Committee has engaged in activity which would require it to register and report in accordance with Sections 433 and 434 of Title 2 of the United States Code.

Registration and Reporting by a Political Committee

Section 433(a) of Title 2 of the United States Code requires each political committee which anticipates receiving contributions or making expenditures during the calendar year in an aggregate amount or value exceeding \$1,000 to file with the Commission a statement of organization within 10 days following the date of the anticipation.

Section 434(a) of Title 2 of the United States Code requires the treasurer of a political committee to file with the Commission reports of receipts and expenditures on prescribed or approved forms.

Our review of the State report revealed a fundraising event held October 28, 1976 which netted proceeds of \$19,350.00. The proceeds of the event were disbursed by the County Committee to district coordinators for distribution to precinct captains for the purposes set forth in Chapter 3, Article 8, Section 9 of the Code of West Virginia. According to a representative of the West Virginia Attorney General's office, the section of the code





cited above deals with expenditures of a political committee, a portion of which deals specifically with election day expenses.

It is the opinion of the Audit staff, based upon the information presented, that the distribution mentioned above was made for Get-Out-The Vote activities. As such, according to Advisory Opinion 1978-10, the County Committee would normally be required to allocate the activity between Federal and non-Federal elections on a reasonable basis. It appears reasonable that the portion allocated for Federal elections would exceed \$1,000. As such, the County Committee would normally be required to register and report in accordance with Sections 433 and 434. Therefore, the matter is referred to your Division for consideration along with the matter referred on November 30, 1978 (Attachment #2).

Any questions concerning the matter should be communicated to Ray Lisi on extension 3-4060 or Charlie Hanshaw on extension 3-4155.

Attachments as stated



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. Thomas A. Tomblin  
1976 Logan County Democratic  
Campaign Committee  
Justice Addition  
Logan, West Virginia 25601

Dear Mr. Tomblin:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. It has come to our attention that your organization may have made expenditures to influence Federal elections during the calendar year 1976. In particular, your committee appears to have distributed approximately \$19,530 in 1976 for election day expenses.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" for 1976, subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

Please notify the Commission within thirty (30) days from the date of this letter of your decision on this matter. If you have any questions, please contact David Greevy, in our Reports Analysis Division at (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Thomas J. Haselhorst  
Assistant Staff Director

Enclosure

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

RAD

564-14

### REPORTS ANALYSIS REFERRAL SHEET

DATE March 28, 1980

ANALYST Dug Greevy Aug 3/11

TO: Office of General Counsel

TEAM CHIEF Bobby Verfel RJD

THROUGH: STAFF DIRECTOR

COMPLIANCE REVIEW ea

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS PAH

CANDIDATE/COMMITTEE:

Committee for a Better Logan County

TREASURER:

ADDRESS:

527 Stratton Street  
Logan, West Virginia

AFFILIATE(S):

ALLEGATION(S):

Unregistered Political Committee

CITE:

2 U.S.C. 433 & 434

ATTACHMENT(S)

A & B

DATE INITIATED: 2/12/79

MANNER IN WHICH REVIEW WAS INITIATED: Referral from Audit Division

☐ Normal Review

☐ Other:

☐ Special Project:

ATTACHMENT

**REPORTS:** All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

**PERIOD COVERED FROM** \_\_\_\_\_ **TO** \_\_\_\_\_

**TOTAL RECEIPTS \$** \_\_\_\_\_ **TOTAL EXPENDITURES \$** \_\_\_\_\_

**CASH ON HAND \$** \_\_\_\_\_ **DEBTS \$** \_\_\_\_\_

**HISTORY:**

**RESULTS OF REVIEW:**

*ATTACHMENT*

None

**COMMUNICATIONS WITH CANDIDATE/COMMITTEE:**

*ATTACHMENT*

None

**REASON(S) FOR REFERRAL:**

*ATTACHMENT*

See Cover Memo: Haselhorst to OGC

**OTHER PENDING ACTIONS INITIATED BY RAD:**

*ATTACHMENT*

None

**OTHER RELEVANT INFORMATION:**

*ATTACHMENT*

Request for Additional Information, 12/13/78, sent to transferring committee C  
Response Receive to RFAI, 2/14/79 D  
Memo to the File: Greevy, 11/7/79 E  
Letter Prepared to Send to Logan County Committee F

**PREVIOUS OGC/AUDIT REFERRALS FROM RAD:**

None

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

RAD

REPORTS ANALYSIS REFERRAL SHEET

DATE March 28, 1980

ANALYST Dug Creevy *by 3/11*

TO: Office of General Counsel

TEAM CHIEF Bobby Verfel

THROUGH: STAFF DIRECTOR

COMPLIANCE REVIEW B

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *WJH*

CANDIDATE/COMMITTEE: Mingo County Democratic Executive Committee

TREASURER:

ADDRESS: c/o Pastie Runyon  
Williamson, WV

AFFILIATE(S):

ALLEGATION(S):

CITE:

ATTACHMENT(S)

Unregistered Political Committee

2 U.S.C. 433 & 434

A & B

DATE INITIATED: 2/12/79

MANNER IN WHICH REVIEW WAS INITIATED:

Referral from Audit Division

☐ Normal Review

☐ Other:

ATTACHMENT

☐ Special Project:

A

**REPORTS:** All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM \_\_\_\_\_ TO \_\_\_\_\_

TOTAL RECEIPTS \$ \_\_\_\_\_ TOTAL EXPENDITURES \$ \_\_\_\_\_

CASH ON HAND \$ \_\_\_\_\_ DEBTS \$ \_\_\_\_\_

**HISTORY:**

RESULTS OF REVIEW:

ATTACHMENT

None

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

None

REASON(S) FOR REFERRAL:

ATTACHMENT

See Cover Memo: Haselhorst to OGC

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

None

OTHER RELEVANT INFORMATION:

ATTACHMENT

Request for Additional Information, 12/13/78, sent to transferring committee C  
Response Received to PFAI, 2/14/79 D  
Memo to the File: Greevy, 11/7/79 E  
Letter Prepared to Send to Mingo County Committee F

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

None



REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

RAD

506-74

### REPORTS ANALYSIS REFERRAL SHEET

DATE March 28, 1980

ANALYST Dug Greedy *by 3/11*

TO: Office of General Counsel

TEAM CHIEF Bobby Werfel

THROUGH: STAFF DIRECTOR

COMPLIANCE REVIEW By

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *[Signature]*

CANDIDATE/COMMITTEE:

Independent Democratic Committee

TREASURER:

ADDRESS:

Post Office Box 310  
Logan, West Virginia

AFFILIATE(S):

ALLEGATION(S):  
Unregistered Political Committee

CITE:  
2 U.S.C. 433 & 434

ATTACHMENT(S)  
A & B

DATE INITIATED: 2/12/79

MANNER IN WHICH REVIEW WAS INITIATED: Referral from Audit Division

☐ Normal Review

☐ Other:

☐ Special Project:

ATTACHMENT

A

**REPORTS:** All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM \_\_\_\_\_ TO \_\_\_\_\_

TOTAL RECEIPTS \$ \_\_\_\_\_ TOTAL EXPENDITURES \$ \_\_\_\_\_

CASH ON HAND \$ \_\_\_\_\_ DEBTS \$ \_\_\_\_\_

**HISTORY:**

RESULTS OF REVIEW: *ATTACHMENT*

None

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: *ATTACHMENT*

None

REASON(S) FOR REFERRAL: *ATTACHMENT*

See Cover Memo: Haselhorst to OGC

OTHER PENDING ACTIONS INITIATED BY RAD: *ATTACHMENT*

None

OTHER RELEVANT INFORMATION: *ATTACHMENT*

Request for Additional Information, 12/13/78, sent to transferring committee C  
Response Received to RFAI, 2/14/79 D  
Memo to the File: Greevy, 11/7/79 E  
Letter Prepared to Send to Independent Democrats Committee F

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

None

November 30, 1978

MEMO TO THE FILE

During the course of the audit of the West Virginia State Democratic Telethon Committee, the auditors performed a cursory review of disclosure reports filed by candidates for Federal office from the State of West Virginia to determine whether all transfers had been disclosed in accordance with 2 U.S.C. 434(b)(4).

As a result of the trace, it was determined that the Keep Nick Rahall In Congress Committee made the following transfers to unregistered political groups within West Virginia for apparent Get Out The Vote Activities:

Committee For a Better Logan County	5-02-78	\$5,000.00
Independent Democrats Committee (Logan County)	5-02-78	3,000.00
Independent Democrats Committee (Logan County)	5-05-78	2,000.00
Mingo County Democratic Executive Committee	5-03-78	2,500.00
Mingo County Democratic Executive Committee	5-05-78	1,500.00

Since this activity totally involves committees not within the scope of the West Virginia State Democratic Telethon Committee audit, the activity was mentioned to the Reports Analysts responsible for reviewing reports of West Virginia Committees to make them aware of the situation in order that they may deem it necessary to pursue the recipient committees as unregistered committees.

cc: Tom Haselhorst,  
Assistant Staff Director  
for Reports Analysis



FEDERAL ELECTION COMMISSION

125 A STREET NW  
WASHINGTON, D.C. 20461

18 DEC 1977

Mr. Anthony P. Gonzalez, Treasurer  
KEEP NICK RAHALL IN CONGRESS COMMITTEE  
P.O. Box 64  
Beckley, West Virginia 25801

Dear Mr. Gonzalez:

This letter is prompted by our interest in assisting House candidates and committees who wish to comply with the Federal Election Campaign Act.

During review of the 30 Day Post Primary Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

The Federal Election Commission, in connection with its statutory responsibility to enforce the Act, reviews all Federal campaign disclosure documents, including those filed initially with the Clerk of the House. The Office of the Clerk, as an informational service, is notifying filers of the errors and omissions found in their preliminary review of documents filed with the Clerk. This letter and attached documentation constitute official notification by the Commission of errors and omissions found, and require a written response.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Clerk of the House, Office of Records and Registration, 1036 Longworth HOB, Washington, D.C. 20515, with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Beth Holland in our Reports Analysis Division on the toll free number (800) 424-9530. Our local number is (202) 523-4172.

Sincerely,

*Orlando B. Potter*

Orlando B. Potter  
Staff Director

Attachment  
FEC Form 12

FEDERAL ELECTION COMMISSION  
1325 K Street, N.W.  
Washington, D.C. 20463

BP/4

TO: KEEP NICK RAHALL IN CONGRESS COMMITTEE WV/OK

DATE: 18 DEC 1978

I.D. NO.: 000081356

REQUEST FOR ADDITIONAL INFORMATION FOR THE 30 Day Post Primary REPORT OF RECEIPTS  
AND EXPENDITURES COVERING THE PERIOD 4/25/78 THROUGH 5/29/78  
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

- ☐ Coverage Dates: ☐ omitted or ☐ incorrect
- ☐ Summary Page Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☐ Detailed Summary (Page 2) Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☐ Schedule Totals: ☐ disagree with Detailed Summary (Page 2) or ☐ omitted
- ☐ Date(s): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Full Name(s)/Mailing Address(es): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Occupation/Principal Place(s) of Business: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Election Designation: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Aggregate Year-to-Date Totals: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Nature or Purpose of Expenditure: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Nature or Purpose of Receipt: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Inadequate Description of: ☐ proceeds ☐ dates ☐ events ☐ location of Schedule
- ☐ Signature: ☐ omitted ☐ inadequate
- 11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.*
- ☒ Other: Please see Page Two

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

BP/4

**REQUEST FOR ADDITIONAL INFORMATION - PAGE TWO  
KEEP NICK RAHALL IN CONGRESS COMMITTEE  
30 DAY POST PRIMARY REPORT**

On Schedule B you list \$14,000.00 in expenditures made to unregistered committees for election day expenses. Please provide further clarification as to the nature of those expenses.

On Schedule C your report discloses loans from Nick J. Rahall. Please clarify whether the amount loaned to the committee was from the candidate's personal funds, or a note obtained from a bank through the candidate. If the loans are from a bank, please provide the name and address of the lending institution and the interest rates and terms of the loans.



FORM 100-1  
 REVISED  
 January, 1973  
 Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20463

(Operating, Transfer Out, Contributions In-Kind,  
 Loans, Less Money Orders and Inclusions)  
 Supporting Lines 10a, 21a, and 22a, 23a, and 23c  
 of FEC FORM 3

Line Number \_\_\_\_\_  
 Also Separate Schedules for  
 each numbered line

Name of Candidate or Committee in Full

Keep Mick Bahall In Congress Committee

Full Name, Mailing Address and ZIP Code	Particulars of Expenditures	Date (month, day, year)	Amount of each expenditure this period
Committee For a Better Logan County 527 Stratton St. Logan, W. Va.	For Precinct Organizations and Election Day Expenses Expenditures for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/2/73	5,000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditures	Date (month, day, year)	Amount of each expenditure this period
Independent Democrats Committee P. O. Box 810 Logan, W. Va.	For Precinct Comm. & Election Day Expenses Expenditures for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/2/73 5/3/73	3,000.00 2,000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditures	Date (month, day, year)	Amount of each expenditure this period
Mingo County Democrat Assoc. 2400 1/2 Hwy 10 Williamson, W. Va.	For Precinct Organization & Election Day Expenses Expenditures for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/2/73 5/5/73	2,500.00 1,500.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditures	Date (month, day, year)	Amount of each expenditure this period
	Expenditures for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditures	Date (month, day, year)	Amount of each expenditure this period
	Expenditures for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditures	Date (month, day, year)	Amount of each expenditure this period
	Expenditures for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditures	Date (month, day, year)	Amount of each expenditure this period
	Expenditures for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditures	Date (month, day, year)	Amount of each expenditure this period
	Expenditures for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditures	Date (month, day, year)	Amount of each expenditure this period
	Expenditures for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Total of expenditures this period (shown)			\$ 14,000.00

7201137500



# Congressman Nick Rahall

REGULAR MAIL  
5 319

February 14, 1979

16 PM 3:09

The Honorable Edmund L. Henshaw, Jr.  
Clerk of the House  
Room 1036 Longworth Building  
Washington, D. C.

Dear Mr. Henshaw:

My Campaign Treasurer, Anthony P. Gonzalez, has received several requests from the Federal Elections Commission to make certain clarifications to reports filed by both of my campaign committees - the Keep Nick Rahall In Congress Committee (#069965) and the Nick J. Rahall For Congress Committee (#05319). With your permission I will answer those requests in this letter as Mr. Gonzalez is not available at this time, and when he returns he will forward a letter to you verifying the information contained in this letter. 058319

1) On August 25, 1978 the Commission requested clarification to the 10 day Pre-Primary Report for the Keep Nick Rahall In Congress Committee regarding a contribution listed as being received from the firm of Thornhill, Kennedy, and Vaughan on April 6, 1978 in the amount of \$500.00. Please correct the record to reflect:

- Warren A. Thornhill, III of 800 Woodlawn Avenue, Beckley, West Virginia, who is an attorney located in the Raleigh County National Bank Building in Beckley, West Virginia contributed \$166.67 to my Campaign Committee on April 6, 1978. His aggregate contributions to the date of the report were \$166.67.

- David T. Kennedy of 102 Mollohan Drive, Beckley, West Virginia who is an attorney located in the Raleigh County National Bank Building in Beckley, West Virginia contributed \$166.66 to my Campaign Committee on April 6, 1978 and that his aggregate contributions to the date of the report were \$166.66.

- James F. Vaughan, Jr. of 109 College Avenue, Beckley, West Virginia who is also an attorney with offices in the Raleigh County National Bank Building in Beckley, West Virginia contributed \$166.66 to the Committee on April 6, 1978, and his aggregate contributions to the date of the report were \$166.66

2) On November 13, 1978 the Commission requested additional information from the Nick Joe Rahall For Congress Committee concerning their October 10, 1978 Report which showed an expenditure to the U.S. Postmaster as a "debt". The word "debt" which appears below the typed explanation of the expenditure was a typographical error on the part of the typist. The notation was an "in-house" note marking that the mailings were for contributions to retire the "debt". The Committee was not indebted to the U.S. Postmaster. Please correct the record to have the word "debt" deleted as it is irrelevant to the report.

3) On December 19, 1978 the Commission requested clarification to the Keep Nick Rahall In Congress Committee 30 Day Post Primary Report in two instances:

a) Further clarification as to the nature of the expenses of the Committees to which the Committee paid \$14,000 for "election day expense".

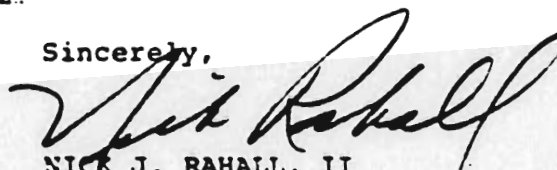
The monies "transferred" to the three political committees were to help defray the expenses the Committee had in the three counties for such things as signs, sample ballots, expenses for vehicles taking voters to the polls, and a 'get out the vote' type operation. It would be impossible for the Committee - the donor, to list specifically in each instance as to how the money donated was spent as the contributions were made to help defray the cost for the committee within the county. Further information on how the money was exactly spent will have to come from the committees.

b) The Commission requested further information on the personal loans the Candidate made to the Committee. Attached are new Schedule "C" forms which reflect the information requested.

I trust the above and the attached satisfies the requests made by the Commission and we will be happy to furnish additional information if further clarification is necessary.

With warm regard, I am

Sincerely,



NICK J. RAHALL, II  
Member of Congress

NJR/jmk

Enclosures

FYI :

The attached four SV's were referred, without backup, from Audit. The information in the Audit referrals has been incorporated into the SV notices.

---

Can audit provide any backup to attach to these letters?

It seems to me that the W.Va. letter in particular should have more explanation as to the basis for the allegations.

OBP  
9/11



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Treasurer  
Independent Democrats Committee  
Post Office Box 810  
Logan, West Virginia

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. It has come to our attention that your organization may have made expenditures to influence Federal elections during the calendar year 1978. In particular, your committee appears to have received \$5,000 from the Keep Nick Rahall in Congress Committee. These funds may have been used for get-out-the-vote activities. A copy of that portion of the report is attached.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" for 1978, subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

-2-

Please notify the Commission within thirty (30) days from the date of this letter of your decision on this matter. If you have any questions, please contact David Greevy, in our Reports Analysis Division at (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Thomas J. Haselhorst  
Assistant Staff Director

Enclosure



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Treasurer  
Committee for a Better  
Logan County  
527 Stratton Street  
Logan, West Virginia

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. It has come to our attention that your organization may have made expenditures to influence Federal elections during the calendar year 1978. In particular, your committee appears to have received \$5,000 from the Keep Nick Rahall in Congress Committee. These funds may have been used for get-out-the-vote activities. A copy of that portion of the report is attached.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" for 1978, subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.



Please notify the Commission within thirty (30) days from the date of this letter of your decision on this matter. If you have any questions, please contact David Greevy, in our Reports Analysis Division at (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Thomas J. Haselhorst  
Assistant Staff Director

Enclosure





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Treasurer  
Mingo County Democratic  
Executive Committee  
c/o Rastie Runyon  
Williamson, West Virginia

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. It has come to our attention that your organization may have made expenditures to influence Federal elections during the calendar year 1978. In particular, your committee appears to have received \$4,000 from the Keep Nick Rahall in Congress Committee. These funds may have been used for get-out-the-vote activities. A copy of that portion of the report is attached.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" for 1978, subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have questions, please contact David Greevy, in our Reports Analysis Division at (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Thomas J. Haselhorst  
Assistant Staff Director

Enclosure

Letters and Notifications  
to respondent committees



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Thomas A. Tomblin, Treasurer  
1976 Logan County Democratic  
Campaign Committee  
Box 813  
Logan, West Virginia 25601

Re: MUR 1227

Dear Mr. Tomblin:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, found evidence that your committee may have violated sections 433 and 434 of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, the committee's distribution of approximately \$19,350 in 1976 to precinct captains for election day expenses may have obligated the committee to register and file reports with the Commission.

An investigation has been conducted and after considering the circumstances of this matter, the Commission determined, on , 1980, that there is reason to believe that your committee violated 2 U.S.C. §§ 433 and 434 and further determined to take no further action in this matter. Accordingly, the file has been closed.

Please be advised that the 1979 amendments to the Act have amended the definition of "political committee" to include any local committee of a political party which receives contributions aggregating in excess of \$5,000 during a calendar year, or makes payments exempted from the definition of "contribution" or "expenditures" (as defined at 2 U.S.C. § 431(8) and 431(9)) aggregating in excess of \$5,000 during a calendar year, or makes contributions aggregating in excess of \$1,000 during a calendar year or makes expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(C). All committees which meet the definition of a political committee under the Act are required to register and report with the Commission.

The payment of "get-out-the-vote" expenses by a political party committee may qualify the committee as a political committee under the Act. Get-out-the-vote expenses should be allocated on a reasonable basis between federal and non-federal activity during a federal election year. 11 C.F.R. § 106.1(e). If a political party committee makes payments exempt from the definition of "contribution" or "expenditure" (2 U.S.C. §§ 431(8) and (9)),

allocable to federal candidates, in excess of \$5,000 per calendar year, or makes expenditures for other get-out-the-vote activities, allocable to federal candidates not exempted from the definition of "contribution" or "expenditure" (2 U.S.C. §§ 431(8) and (9)) in excess of \$1,000 per calendar year, then the committee qualifies as a political committee under the Act, and must register with the Commission within 10 days of becoming a political committee.

A report on the Commission's finding is enclosed for your information.

If you have any questions please contact Maura White, the staff member assigned to this matter, at 202/523-4060.

Sincerely,

Enclosure

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE \_\_\_\_\_

MUR NO. 1227  
STAFF MEMBER(S) & TEL. NO.  
Maura White/ David Branch

RESPONDENT 1976 Logan County Democratic  
Campaign Committee

(202) 523-4060

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On March 28, 1980, the Reports Analysis Division ("RAD") referred the name of the 1976 Logan County Democratic Campaign Committee to the Office of General Counsel for failure to register with, and report to, the Commission in violation of 2 U.S.C. §§ 433 and 434.

FACTUAL BASIS & LEGAL ANALYSIS

1976 Logan County Democratic Campaign Committee  
("Logan County Committee")

Audit received a copy of a West Virginia state disclosure report for the Logan County Committee during the course of an audit of the West Virginia State Democratic Telethon Committee. Audit's review of the West Virginia state report revealed that a fundraising event was held on October 28, 1976, which netted proceeds of \$19,350. The reports further indicated that the proceeds of the event were disbursed by the Logan County Committee to direct coordinators for distribution to precinct captains for the purposes set forth in Chapter 3, Article 8, Section 9 of the Code of West Virginia. This section of the code deals with expenditures of a political committee, a portion of which deals specifically with election day expenses. Based on this information, it is the opinion of Audit that the distribution of funds was made for GOTV activities.

B. ANALYSIS

The Commission has recognized in Advisory Opinion 1978-50 that GOTV and voter registration expenditures are considered administrative expenses and may be allocated in the same manner as administrative expenses. Pursuant to 11 C.F.R. § 106.1(e) party committees and other political committees which have established federal campaign committees shall allocate administrative expenses on a reasonable basis between their federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis. The Commission has further recognized in Advisory Opinions 1978-50, 1978-28, 1978-102, 1978-10, Re: AOR 1978-72, and its September 1977 guideline, that various methods may be "reasonable" for the allocation of the GOTV expenses of political parties. Additionally, the Commission has held in AO 1978-28 that the expenses of a political party organization for GOTV drives in a federal election year are, at least in part, for the purpose of influencing the election of persons to federal office even though the drive is not conducted expressly or exclusively on behalf of federal candidates. See also AO 1978-50 and AO 1978-10.

2 U.S.C. § 431(e)(5)(E) and 11 C.F.R. § 100.4(b)(7) (recodified at 2 U.S.C. § 431(8)(B)(v) and § 100.7(b)(9)) exclude from the definition of contribution the payment by a state or local committee of a political party of the costs of preparation, display, or mailing or other distribution incurred by the committee with respect to a printed slate card, sample ballot, palm card, or other printed listing of three or more candidates for any public office for which an election is held in the state in which the committee is organized.

2 U.S.C. § 431(f)(4)(G) and 11 C.F.R. § 100.7(b)(11) (recodified at 2 U.S.C. § 431(9)(B)(iv) and 11 C.F.R. § 100.8(b)(10)) exclude from the definition of expenditure the payment, by a state or local committee of a political party, of the costs of preparation, display, or mailing or other distribution incurred by the Committee with respect to a printed slate card, sample ballot, palm card, or other printed listing of three or more candidates for any public office for which an election is held in the state in which the committee is organized. The 1979 amendments to the Act further exclude from the definition of contribution, and expenditure, the payment by a state or local political party committee of the costs of campaign materials (such as pins, bumper stickers, handbills, brochures, party tabloids, and yard signs) used by such committee in connection with volunteer activities on behalf of the nominees of such party provided that such payments are not for the costs of campaign materials or activities used in connection with any broadcasting, newspaper, magazine, billboard, direct mail, or similar type of general public communication or political advertising. 2 U.S.C. § 431(8)(E)(x) and 11 C.F.R. § 100.7(b)(15) and 2 U.S.C. § 431(9)(B)(viii) and 11 C.F.R. § 100.8(b)(16).



- 3 -

Prior to the passage of the 1979 amendments to the Act, a political committee was defined to include any committee, club, organization, or other groups of persons which received contributions or made expenditures during a calendar year in an aggregate amount exceeding \$1,000. 2 U.S.C. § 431(d) and 11 C.F.R. § 100.14. The 1979 amendments to the Act, however, amended the definition of political committee to include the local committee of a political party which receives contributions aggregating in excess of \$5,000 during a calendar year, or makes payments exempted from the definition of contribution or expenditure aggregating in excess of \$5,000 per year, or makes contributions or expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(C) and 11 C.F.R. § 100.5(c). State party committees are defined to be political committees under the Act if they receive contributions or makes expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(A) (former 2 U.S.C. § 431(d)). 2 U.S.C. § 434 requires that the treasurer of a political committee file reports of receipts and expenditures with the Commission. 2 U.S.C. § 433 requires that each political committee file a statement of organization with the Commission.

The application of any of the approved reasonable methods of allocation of GOTV activity would most probably result in a determination that the respondent committee, the Logan County Committee, was a political committee under the Act prior to the 1979 amendments to the Act. Because of the length of time that has elapsed (4 years) since the Logan County Committee engaged in activity which may have required it to register and report with the Commission, and because we know of no other activity which would bring the Committee under the Commission's jurisdiction, and as the 1979 Amendments have exempted additional activity from the definition of contribution and expenditure, the General Counsel recommends that the Commission find reason to believe that the 1976 Logan County Democratic Campaign Committee violated 2 U.S.C. §§ 433 and 434 and take no further action.

Based on the foregoing analysis, the Federal Election Commission has found:

1) Reason to Believe that the 1976 Logan County Democratic Campaign Committee violated 2 U.S.C. §§ 433 and 434 and determined to take no further action in this matter.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Independent Democrats Committee  
P.O. Box 810  
Logan, West Virginia

Re: MUR 1227

Dear Sir or Madam:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, found evidence that your committee may have violated sections 433 and 434 of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, the committee's receipt of \$5,000 from the Keep Nick Rahall in Congress Committee during 1978 for precinct organization and election day expenses may have obligated the committee to register and file reports with the Commission.

An investigation has been conducted and after considering the circumstances of this matter, the Commission determined, on , 1980, that there is reason to believe that your committee violated 2 U.S.C. §§ 433 and 434 and further determined to take no further action in this matter. Accordingly, the file has been closed.

Please be advised that the 1979 amendments to the Act have amended the definition of "political committee" to include any local committee of a political party which receives contributions aggregating in excess of \$5,000 during a calendar year, or makes payments exempted from the definition of "contribution" or "expenditures" (as defined at 2 U.S.C. § 431(8) and 431(9)) aggregating in excess of \$5,000 during a calendar year, or makes contributions aggregating in excess of \$1,000 during a calendar year or makes expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(C). All committees which meet the definition of a political committee under the Act are required to register and report with the Commission.

The payment of "get-out-the-vote" expenses by a political party committee may qualify the committee as a political committee under the Act. Get-out-the-vote expenses should be allocated on a reasonable basis between federal and non-federal activity during a federal election year. 11 C.F.R. § 106.1(e). If a political party committee makes payments exempt from the definition of "contribution" or "expenditure" (2 U.S.C. §§ 431(8) and (9)),

allocable to federal candidates, in excess of \$5,000 per calendar year, or makes expenditures for other get-out-the-vote activities, allocable to federal candidates not exempted from the definition of "contribution" or "expenditure" (2 U.S.C. §§ 431(8) and (9)) in excess of \$1,000 per calendar year, then the committee qualifies as a political committee under the Act, and must register with the Commission within 10 days of becoming a political committee.

A report on the Commission's finding is enclosed for your information.

If you have any questions please contact Maura White, the staff member assigned to this matter, at 202/523-4060.

Sincerely,

Enclosure

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE \_\_\_\_\_

MUR NO. 1227  
STAFF MEMBER(S) & TEL. NO.  
Maura White/ David Branch

RESPONDENT Independent Democrats Committee

(202) 523-4060

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On March 28, 1980, the Reports Analysis Division ("RAD") referred the name of the Independent Democrats Committee to the Office of General Counsel for failure to register with, and report to, the Commission in violation of 2 U.S.C. §§ 433 and 434.

FACTUAL BASIS & LEGAL ANALYSIS

(1) Independent Democrats Committee

Audit performed a cursory review of disclosure reports filed by federal candidates in West Virginia during the course of the audit of the West Virginia State Democratic Telethon Committee. As a result of this review, it was determined that during May 1978 the Keep Nick Rahall In Congress Committee, a federal committee, made two transfers totalling \$5,000 to the Independent Democrats Committee. The particulars of these expenditures were listed as "precinct organization and election day expense."

On December 18, 1979, RAD mailed the Keep Nick Rahall In Congress Committee a request for additional information ("RFAI") concerning the \$5,000 reported as expenditures in May 1978 for election day expenses; the committee's response stated that the monies "transferred" to the political committee were to help defray the expenses the Committee had in the county for such things as signs, sample ballots, expenses for vehicles taking voters to the polls, and a 'get out the vote' type operation.

B. ANALYSIS

The Commission has recognized in Advisory Opinion 1978-50 that GOTV and voter registration expenditures are considered administrative expenses and may be allocated in the same manner as administrative expenses. Pursuant to 11 C.F.R. § 106.1(e) party committees and other political committees which have established federal campaign committees shall allocate administrative expenses on a reasonable basis between their federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis. The Commission has further recognized in Advisory Opinions 1978-50, 1978-28, 1978-102, 1978-10, Re: AOR 1978-72, and its September 1977 guideline, that various methods may be "reasonable" for the allocation of the GOTV expenses of political parties. Additionally, the Commission has held in AO 1978-28 that the expenses of a political party organization for GOTV drives in a federal election year are, at least in part, for the purpose of influencing the election of persons to federal office even though the drive is not conducted expressly or exclusively on behalf of federal candidates. See also AO 1978-50 and AO 1978-10.

2 U.S.C. § 431(e)(5)(E) and 11 C.F.R. § 100.4(b)(7) (recodified at 2 U.S.C. § 431(8)(B)(v) and § 100.7(b)(9)) exclude from the definition of contribution the payment by a state or local committee or a political party of the costs of preparation, display, or mailing or other distribution incurred by the committee with respect to a printed slate card, sample ballot, palm card, or other printed listing of three or more candidates for any public office for which an election is held in the state in which the committee is organized.

2 U.S.C. § 431(f)(4)(G) and 11 C.F.R. § 100.7(b)(11) (recodified at 2 U.S.C. § 431(9)(B)(iv) and 11 C.F.R. § 100.8(b)(10)) exclude from the definition of expenditure the payment, by a state or local committee of a political party, of the costs of preparation, display, or mailing or other distribution incurred by the Committee with respect to a printed slate card, sample ballot, palm card, or other printed listing of three or more candidates for any public office for which an election is held in the state in which the committee is organized. The 1979 amendments to the Act further exclude from the definition of contribution, and expenditure, the payment by a state or local political party committee of the costs of campaign materials (such as pins, bumper stickers, handbills, brochures, party tabloids, and yard signs) used by such committee in connection with volunteer activities on behalf of the nominees of such party provided that such payments are not for the costs of campaign materials or activities used in connection with any broadcasting, newspaper, magazine, billboard, direct mail, or similar type of general public communication or political advertising. 2 U.S.C. § 431(8)(B)(x) and 11 C.F.R. § 100.7(b)(15) and 2 U.S.C. § 431(9)(B)(viii) and 11 C.F.R. § 100.8(b)(16).



- 3 -

Prior to the passage of the 1979 amendments to the Act, a political committee was defined to include any committee, club, organization, or other groups of persons which received contributions or made expenditures during a calendar year in an aggregate amount exceeding \$1,000. 2 U.S.C. § 431(d) and 11 C.F.R. § 100.14. The 1979 amendments to the Act, however, amended the definition of political committee to include the local committee of a political party which receives contributions aggregating in excess of \$5,000 during a calendar year, or makes payments exempted from the definition of contribution or expenditure aggregating in excess of \$5,000 per year, or makes contributions or expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(C) and 11 C.F.R. § 100.5(c). State party committees are defined to be political committees under the Act if they receive contributions or makes expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(A) (former 2 U.S.C. § 431(d)). 2 U.S.C. § 434 requires that the treasurer of a political committee file reports of receipts and expenditures with the Commission. 2 U.S.C. § 433 requires that each political committee file a statement of organization with the Commission.

Besides the receipt of the \$5,000 transfer during 1978, there is no evidence of any other activity by the Independent Democrats Committee which would bring it under the jurisdiction of the Commission. Because of this consideration and because it would not be in the Commission's interest to require this committee to register and report to the Commission as a result of activity which may no longer be sufficient to qualify the committee as a political committee under the Act, the General Counsel recommends that the Commission find reason to believe that the Independent Democrats Committee violated 2 U.S.C. § 433 and 434 and take no further action in this matter.

Based on the foregoing analysis, the Federal Election Commission has found:

1) Reason to Believe that the Independent Democrats Committee violated 2 U.S.C. §§ 433 and 434 and further determined to take no further action in this matter.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Committee for a Better  
Logan County  
527 Stratton Street  
Logan, West Virginia

Re: MUR 1227

Dear Sir or Madam:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, found evidence that your committee may have violated sections 433 and 434 of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, the committee's receipt of \$5,000 from the Keep Nick Rahall in Congress Committee during 1978 for precinct organization and election day expenses may have obligated the committee to register and file reports with the Commission.

An investigation has been conducted and after considering the circumstances of this matter, the Commission determined, on , 1980, that there is reason to believe that your committee violated 2 U.S.C. §§ 433 and 434 and further determined to take no further action in this matter. Accordingly, the file has been closed.

Please be advised that the 1979 amendments to the Act have amended the definition of "political committee" to include any local committee of a political party which receives contributions aggregating in excess of \$5,000 during a calendar year, or makes payments exempted from the definition of "contribution" or "expenditures" (as defined at 2 U.S.C. § 431(8) and 431(9)) aggregating in excess of \$5,000 during a calendar year, or makes contributions aggregating in excess of \$1,000 during a calendar year or makes expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(C). All committees which meet the definition of a political committee under the Act are required to register and report with the Commission.

The payment of "get-out-the-vote" expenses by a political party committee may qualify the committee as a political committee under the Act. Get-out-the-vote expenses should be allocated on a reasonable basis between federal and non-federal activity during a federal election year. 11 C.F.R. § 106.1(e). If a political party committee makes payments exempt from the definition of "contribution" or "expenditure" (2 U.S.C. §§ 431(8) and (9)),



Letter to: Committee for a Better Logan County  
Page 2

allocable to federal candidates, in excess of \$5,000 per calendar year, or makes expenditures for other get-out-the-vote activities, allocable to federal candidates not exempted from the definition of "contribution" or "expenditure" (2 U.S.C. §§ 431(8) and (9)) in excess of \$1,000 per calendar year, then the committee qualifies as a political committee under the Act, and must register with the Commission within 10 days of becoming a political committee.

A report on the Commission's finding is enclosed for your information.

If you have any questions please contact Maura White, the staff member assigned to this matter, at 202/523-4060.

Sincerely,

Enclosure

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE \_\_\_\_\_

MUR NO. 1227  
STAFF MEMBER(S) & TEL. NO.  
Maura White/ David Branch

RESPONDENT Committee for a Better Logan  
County

(202) 523-4060

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On March 28, 1980, the Reports Analysis Division ("RAD") referred the name of the Committee for a Better Logan County to the Office of General Counsel for failure to register with, and report to, the Commission in violation of 2 U.S.C. §§ 433 and 434.

FACTUAL BASIS & LEGAL ANALYSIS

(1) Committee for a Better Logan County

Audit performed a cursory review of disclosure reports filed by federal candidates in West Virginia during the course of the audit of the West Virginia State Democratic Telethon Committee. As a result of this review, it was determined that during May 1978 the Keep Nick Rahall In Congress Committee, a federal committee, made a transfer of \$5,000 to the Committee for a Better Logan County. The particulars of this expenditure was listed as "precinct organization and election day expense."

On December 18, 1979, RAD mailed the Keep Nick Rahall In Congress Committee a request for additional information ("RFAI") concerning the \$5,000 reported as expenditures in May 1978 for election day expenses; the committee's response stated that the monies "transferred" to the political committee were to help defray the expenses the committee had in the county for such things as signs, sample ballots, expenses for vehicles taking voters to the polls, and a 'get out the vote' type operation.

B. ANALYSIS

The Commission has recognized in Advisory Opinion 1978-50 that GOTV and voter registration expenditures are considered administrative expenses and may be allocated in the same manner as administrative expenses. Pursuant to 11 C.F.R. § 106.1(e) party committees and other political committees which have established federal campaign committees shall allocate administrative expenses on a reasonable basis between their federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis. The Commission has further recognized in Advisory Opinions 1978-50, 1978-28, 1978-102, 1978-10, Re: AOR 1978-72, and its September 1977 guideline, that various methods may be "reasonable" for the allocation of the GOTV expenses of political parties. Additionally, the Commission has held in AO 1978-28 that the expenses of a political party organization for GOTV drives in a federal election year are, at least in part, for the purpose of influencing the election of persons to federal office even though the drive is not conducted expressly or exclusively on behalf of federal candidates. See also AO 1978-50 and AO 1978-10.

2 U.S.C. § 431(e)(5)(E) and 11 C.F.R. § 100.4(b)(7) (recodified at 2 U.S.C. § 431(8)(B)(v) and § 100.7(b)(9)) exclude from the definition of contribution the payment by a state or local committee of a political party of the costs of preparation, display, or mailing or other distribution incurred by the committee with respect to a printed slate card, sample ballot, palm card, or other printed listing of three or more candidates for any public office for which an election is held in the state in which the committee is organized.

2 U.S.C. § 431(f)(4)(G) and 11 C.F.R. § 100.7(b)(11) (recodified at 2 U.S.C. § 431(9)(B)(iv) and 11 C.F.R. § 100.8(b)(10)) exclude from the definition of expenditure the payment, by a state or local committee of a political party, of the costs of preparation, display, or mailing or other distribution incurred by the Committee with respect to a printed slate card, sample ballot, palm card, or other printed listing of three or more candidates for any public office for which an election is held in the state in which the committee is organized. The 1979 amendments to the Act further exclude from the definition of contribution, and expenditure, the payment by a state or local political party committee of the costs of campaign materials (such as pins, bumper stickers, handbills, brochures, party tabloids, and yard signs) used by such committee in connection with volunteer activities on behalf of the nominees of such party provided that such payments are not for the costs of campaign materials or activities used in connection with any broadcasting, newspaper, magazine, billboard, direct mail, or similar type of general public communication or political advertising. 2 U.S.C. § 431(8)(B)(x) and 11 C.F.R. § 100.7(b)(15) and 2 U.S.C. § 431(9)(B)(viii) and 11 C.F.R. § 100.8(b)(16).

To: Committee for a Better Logan County  
Notification of RTB finding

- 3 -

Prior to the passage of the 1979 amendments to the Act, a political committee was defined to include any committee, club, organization, or other groups of persons which received contributions or made expenditures during a calendar year in an aggregate amount exceeding \$1,000. 2 U.S.C. § 431(d) and 11 C.F.R. § 100.14. The 1979 amendments to the Act, however, amended the definition of political committee to include the local committee of a political party which receives contributions aggregating in excess of \$5,000 during a calendar year, or makes payments exempted from the definition of contribution or expenditure aggregating in excess of \$5,000 per year, or makes contributions or expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(C) and 11 C.F.R. § 100.5(c). State party committees are defined to be political committees under the Act if they receive contributions or makes expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(A) (former 2 U.S.C. § 431(d)). 2 U.S.C. § 434 requires that the treasurer of a political committee file reports of receipts and expenditures with the Commission. 2 U.S.C. § 433 requires that each political committee file a statement of organization with the Commission.

Besides the receipt of the \$5,000 transfer during 1978, there is no evidence of any other activity by the Committee for a Better Logan County which would bring it under the jurisdiction of the Commission. Because of this consideration and because it would not be in the Commission's interest to require this committee to register and report to the Commission as a result of activity which may no longer be sufficient to qualify the respondent committee as a political committee under the Act, the General Counsel recommends that the Commission find reason to believe that the Committee for a Better Logan County violated 2 U.S.C. §§ 433 and 434 and take no further action in this matter.

Based on the foregoing analysis, the Federal Election Commission has found:

1) Reason to Believe that the Committee for a Better Logan County violated 2 U.S.C. §§ 433 and 434 and determined to take no further action in this matter.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

E. Donald Evans, Treasurer  
Mingo County Democratic  
Executive Committee  
Box 36  
Williamson, West Virginia 25661

Re: MUR 1227

Dear Mr. Evans:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, found evidence that your committee may have violated sections 433 and 434 of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, the committee's receipt of \$4,000 from the Keep Nick Rahall in Congress Committee during 1978 for precinct organization and election day expenses may have obligated the committee to register and file reports with the Commission.

An investigation has been conducted and after considering the circumstances of this matter, the Commission determined, on , 1980, that there is reason to believe that your committee violated 2 U.S.C. §§ 433 and 434 and further determined to take no further action in this matter. Accordingly, the file has been closed.

Please be advised that the 1979 amendments to the Act have amended the definition of "political committee" to include any local committee of a political party which receives contributions aggregating in excess of \$5,000 during a calendar year, or makes payments exempted from the definition of "contribution" or "expenditures" (as defined at 2 U.S.C. § 431(8) and 431(9)) aggregating in excess of \$5,000 during a calendar year, or makes contributions aggregating in excess of \$1,000 during a calendar year or makes expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(C). All committees which meet the definition of a political committee under the Act are required to register and report with the Commission.

The payment of "get-out-the-vote" expenses by a political party committee may qualify the committee as a political committee under the Act. Get-out-the-vote expenses should be allocated on a reasonable basis between federal and non-federal activity during a federal election year. 11 C.F.R. § 106.1(e). If a political party committee makes payments exempt from the definition of "contribution" or "expenditure" (2 U.S.C. §§ 431(8) and (9)),

allocable to federal candidates, in excess of \$5,000 per calendar year, or makes expenditures for other get-out-the-vote activities, allocable to federal candidates not exempted from the definition of "contribution" or "expenditure" (2 U.S.C. §§ 431(8) and (9)) in excess of \$1,000 per calendar year, then the committee qualifies as a political committee under the Act, and must register with the Commission within 10 days of becoming a political committee.

A report on the Commission's finding is enclosed for your information.

If you have any questions please contact Maura White, the staff member assigned to this matter, at 202/523-4060.

Sincerely,

Enclosure



FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE \_\_\_\_\_

MUR NO. 1227  
STAFF MEMBER(S) & TEL. NO.  
Maura White/ David Branch  
(202) 523-4060

RESPONDENT Mingo County Democratic Executive  
Committee

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On March 28, 1980, the Reports Analysis Division ("RAD") referred the name of the Mingo County Democratic Executive Committee to the Office of General Counsel for failure to register with, and report to, the Commission in violation of 2 U.S.C. §§ 433 and 434.

FACTUAL BASIS & LEGAL ANALYSIS

(1) Mingo County Democratic Executive Committee

Audit performed a cursory review of disclosure reports filed by federal candidates in West Virginia during the course of the audit of the West Virginia State Democratic Telethon Committee. As a result of this review, it was determined that during May 1978 the Keep Nick Rahall In Congress Committee, a federal committee, made two transfers totalling \$4,000 to the Mingo County Democratic Executive Committee. The particulars of these expenditures were listed as "precinct organization and election day expense."

On December 18, 1979, RAD mailed the Keep Nick Rahall In Congress Committee a request for additional information ("RFAI") concerning the \$4,000 reported as expenditures in May 1978 for election day expenses; the committee's response stated that the monies "transferred" to the political committee were to help defray the expenses the Committee had in the county for such things as signs, sample ballots, expenses for vehicles taking voters to the polls, and a 'get out the vote' type operation.



B. ANALYSIS

The Commission has recognized in Advisory Opinion 1978-50 that GOTV and voter registration expenditures are considered administrative expenses and may be allocated in the same manner as administrative expenses. Pursuant to 11 C.F.R. § 106.1(e) party committees and other political committees which have established federal campaign committees shall allocate administrative expenses on a reasonable basis between their federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis. The Commission has further recognized in Advisory Opinions 1978-50, 1978-28, 1978-102, 1978-10, Re: AOR 1978-72, and its September 1977 guideline, that various methods may be "reasonable" for the allocation of the GOTV expenses of political parties. Additionally, the Commission has held in AO 1978-28 that the expenses of a political party organization for GOTV drives in a federal election year are, at least in part, for the purpose of influencing the election of persons to federal office even though the drive is not conducted expressly or exclusively on behalf of federal candidates. See also AO 1978-50 and AO 1978-10.

2 U.S.C. § 431(e)(5)(E) and 11 C.F.R. § 100.4(b)(7) (recodified at 2 U.S.C. § 431(8)(B)(v) and § 100.7(b)(9)) exclude from the definition of contribution the payment by a state or local committee of a political party of the costs of preparation, display, or mailing or other distribution incurred by the committee with respect to a printed slate card, sample ballot, palm card, or other printed listing of three or more candidates for any public office for which an election is held in the state in which the committee is organized.

2 U.S.C. § 431(f)(4)(G) and 11 C.F.R. § 100.7(b)(11) (recodified at 2 U.S.C. § 431(9)(B)(iv) and 11 C.F.R. § 100.8(b)(10)) exclude from the definition of expenditure the payment, by a state or local committee of a political party, of the costs of preparation, display, or mailing or other distribution incurred by the Committee with respect to a printed slate card, sample ballot, palm card, or other printed listing of three or more candidates for any public office for which an election is held in the state in which the committee is organized. The 1979 amendments to the Act further exclude from the definition of contribution, and expenditure, the payment by a state or local political party committee of the costs of campaign materials (such as pins, bumper stickers, handbills, brochures, party tabloids, and yard signs) used by such committee in connection with volunteer activities on behalf of the nominees of such party provided that such payments are not for the costs of campaign materials or activities used in connection with any broadcasting, newspaper, magazine, billboard, direct mail, or similar type of general public communication or political advertising. 2 U.S.C. § 431(8)(B)(x) and 11 C.F.R. § 100.7(b)(15) and 2 U.S.C. § 431(9)(B)(viii) and 11 C.F.R. § 100.8(b)(16).

- 3 -

Prior to the passage of the 1979 amendments to the Act, a political committee was defined to include any committee, club, organization, or other groups of persons which received contributions or made expenditures during a calendar year in an aggregate amount exceeding \$1,000. 2 U.S.C. § 431(d) and 11 C.F.R. § 100.14. The 1979 amendments to the Act, however, amended the definition of political committee to include the local committee of a political party which receives contributions aggregating in excess of \$5,000 during a calendar year, or makes payments exempted from the definition of contribution or expenditure aggregating in excess of \$5,000 per year, or makes contributions or expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(C) and 11 C.F.R. § 100.5(c). State party committees are defined to be political committees under the Act if they receive contributions or makes expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(A) (former 2 U.S.C. § 431(d)). 2 U.S.C. § 434 requires that the treasurer of a political committee file reports of receipts and expenditures with the Commission. 2 U.S.C. § 433 requires that each political committee file a statement of organization with the Commission.

Besides the receipt of the \$4,000 transfer during 1978, there is no evidence of any other activity by the Mingo County Democratic Executive Committee, which would bring it under the jurisdiction of the Commission. Because of this consideration and because it would not be in the Commission's interest to require this committee to register and report to the Commission as a result of activity which may no longer be sufficient to qualify the committee as a political committee under the Act, the General Counsel recommends that the Commission find reason to believe that the Mingo County Democratic Executive Committee violated 2 U.S.C. §§ 433 and 434 and take no further action in this matter.

Based on the foregoing analysis, the Federal Election Commission has found:

1) Reason to Believe that the Mingo County Democratic Executive Committee violated 2 U.S.C. §§ 433 and 434 and determined to take no further action in this matter.



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Robert Burke, Treasurer  
West Virginia State Democratic  
Executive Committee  
2106 Kanawha Blvd., E.  
Charleston, West Virginia 25311

Re: MUR 1127

Dear Mr. Burke:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, found evidence that your committee may have violated sections 433 and 434 of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, the committee's transfer of \$3,500 in 1976 and \$40,900 in 1978 to county committees and individuals for election day expenses may have obligated the committee to register and file reports with the Commission.

An investigation has been conducted and after considering the circumstances of this matter, the Commission determined, on , 1980, that there is reason to believe that your committee violated 2 U.S.C. §§ 433 and 434. A report on the Commission's finding is enclosed for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

All committees which meet the definition of political committee under the Act are required to register and report with the Commission. A political committee, in the case of a state party committee, is defined to mean any club, association, or other group of persons which receives contributions to influence federal elections aggregating in excess of \$1,000 during a calendar year or makes expenditures to influence federal elections aggregating in excess of \$1,000 during a calendar year.

The payment of "get-out-the-vote" expenses by a political party committee may qualify the committee as a political committee under the Act. Get-out-the-vote expenses should be allocated on a reasonable basis between federal and non-federal activity during a federal election year. 11 C.F.R. § 106.1(e).

Letter to: R. Burke  
Page 2

Please submit answers to the enclosed questions within 15 days of receipt of this letter.

In the absence of additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) (formerly § 437g(a)(3)(B)) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions please contact Maura White, the staff member assigned to this matter, at 202-523-4060.

Sincerely,

Enclosure

For the purposes of these questions, the West Virginia State Democratic Executive Committee shall be referred to as "WVSDEC."

1. Did the WVSDEC engage in any get-out-the-vote ("GOTV") or voter registration activities during 1976 or 1978? If the answer is yes, state, for each year, whether or not the activities included the support of federal candidates.
- 2a) Explain the nature and purpose (e.g. taking voters to the polls, slate card/sample ballot) of all transfers, as reported to the state of West Virginia, made by the WVSDEC to individuals or county committees for "general election day expenses," totalling \$3,500, on November 1, 1976.
- b) For all transfers made on November 1, 1976, for "general election day expenses," list the name of all federal candidates on whose behalf GOTV or voter registration expenses were incurred and explain the activity which constituted the expense.
- c) What portion of the \$3,500 expended on November 1, 1976, for "general election day expenses" was spent on the costs of preparation, display, mailing, or other distribution, with respect to a printed slate card or sample ballot, or other printed listing, of three or more candidates for any public office for which an election was held in West Virginia, and where such costs were not incurred with respect to a display made on broadcasting stations, newspapers, magazines, or similar types of general public political advertising?
3. For all transfers made on November 1, 1976, for "general election day expenses," state the name of all candidates (both federal and state), by office sought, who were seeking election in those areas where GOTV or voter registration expenses were incurred.

- 4a) Explain the nature and purpose (e.g. taking voters to the polls, slate card/sample ballot) of all transfers, as reported to the state of West Virginia, made by the WVSDEC to individuals and county committees for "general election day expenses," totalling \$40,900 on October 13 and 30, 1978.
- b) For all transfers made on October 13 and 30, 1978, for "general election day expenses," list the name of all federal candidates on whose behalf GOTV or voter registration expenses were incurred and explain the activity which constituted the expense.
- c) What portion of the \$40,900 expended on October 13 and October 30, 1978, for "general election day expenses" was spent on the costs of preparation, display, mailing, or other distribution, with respect to a printed slate card or sample ballot, or other printed listing, of three or more candidates for any public office for which an election was held in West Virginia, and where such costs were not incurred with respect to a display made on broadcasting stations, newspapers, magazines, or similar types of general public political advertising?
- 5) For all transfers made on October 13, and 30, 1978, for "general election day expenses," state the name of all candidates (both federal and state), by office sought, who were seeking election in those areas where GOTV or voter registration expenses were incurred.
- 6) In addition to the "general election day" expenses incurred by the WVSDEC on November 1, 1976, and October 13 and 30, 1978, has the WVDEC engaged in any other GOTV or voter registration activities? If the answer is yes, please explain the nature of the activity, the amounts expended on that activity, and the date the activity occurred.
- 7) Explain the nature and purpose of the transfer of \$1,000 to the Kanawha County Democratic Executive Committee, a federally registered committee, on or about November 4, 1978.

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE \_\_\_\_\_

MUR NO. 1227  
STAFF MEMBER(S) & TEL. NO.  
Maura White/ David Branch

RESPONDENT West Virginia State Democratic  
Executive Committee

(202) 523-4060

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On March 28, 1980, the Reports Analysis Division ("RAD") referred the name of the West Virginia Democratic Executive Committee to the Office of General Counsel for failure to register with, and report to, the Commission in violation of 2 U.S.C. §§ 433 and 434.

FACTUAL BASIS & LEGAL ANALYSIS

A. (1) West Virginia State Democratic Executive Committee  
("Executive Committee")

During the audit of the West Virginia State Democratic Telethon Committee, Audit received copies of the West Virginia state reports and records of the Executive Committee. The Executive Committee conducts the non-federal activities of the Democratic Party of West Virginia.

Audit's review of the state reports of the Executive Committee revealed that during November 1976 ten transfers totalling \$3,500 were made to two unregistered county committees and eight individuals for "election day expenses." Also, during October, 1978, 106 transfers totalling \$40,900 were made to 55 unregistered county committees for the same purpose. 1/

1/ Audit noted that the official of the Telethon Committee who presented the state reports of the Executive Committee to them, stated that the Executive Committee had sought guidance from the Commission with respect to the handling of "election days expenses," and based upon information received, attached a memorandum to each transfer check informing the recipient committees and individuals of the restricted use of the amounts transferred. Documentation concerning the communication with the Commission was not retained and the official was unable to provide further information concerning it.



Notification of PEB finding

To: West Virginia State Democratic Executive Committee

- 2 -

It is the opinion of Audit that the transfers were made for GOTV activity. Additionally, it should be noted that one of the 106 transfers made in October 1978 totalling \$1,100 was made to the Kanawha County Democratic Executive Committee, a registered committee. Moreover, the Kanawha County Democratic Executive Committee also reported the receipt of a \$1,000 transfer from the Executive Committee during November 1978. Although we have no information as to the purpose of this transaction, it appears that this transfer may have been for "election day expenses" as well.

B. ANALYSIS

The Commission has recognized in Advisory Opinion 1978-50 that GOTV and voter registration expenditures are considered administrative expenses and may be allocated in the same manner as administrative expenses. Pursuant to 11 C.F.R. § 106.1(c) party committees and other political committees which have established federal campaign committees shall allocate administrative expenses on a reasonable basis between their federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis. The Commission has further recognized in Advisory Opinions 1978-50, 1978-28, 1978-102, 1978-10, Re: AOR 1978-72, and its September 1977 guideline, that various methods may be "reasonable" for the allocation of the GOTV expenses of political parties. Additionally, the Commission has held in AO 1978-28 that the expenses of a political party organization for GOTV drives in a federal election year are, at least in part, for the purpose of influencing the election of persons to federal office even though the drive is not conducted expressly or exclusively on behalf of federal candidates. See also AO 1978-50 and AO 1978-10.

2 U.S.C. § 431(e)(5)(E) and 11 C.F.R. § 100.4(b)(7) (recodified at 2 U.S.C. § 431(8)(E)(v) and § 100.7(b)(9)) exclude from the definition of contribution the payment by a state or local committee of a political party of the costs of preparation, display, or mailing or other distribution incurred by the committee with respect to a printed slate card, sample ballot, palm card, or other printed listing of three or more candidates for any public office for which an election is held in the state in which the committee is organized.

2 U.S.C. § 431(f)(4)(G) and 11 C.F.R. § 100.7(b)(11) (recodified at 2 U.S.C. § 431(9)(B)(iv) and 11 C.F.R. § 100.8(b)(10)) exclude from the definition of expenditure the payment, by a state or local committee of a political party, of the costs of preparation, display, or mailing or other distribution incurred by the Committee with respect to a printed slate card, sample ballot, palm card, or other printed listing of three or more candidates for any public office for which an election is held in the state in which the committee is organized.

To: West Virginia State Democratic Executive Committee  
Notification of RTB Finding

- 3 -

Prior to the passage of the 1979 amendments to the Act, a political committee was defined to include any committee, club, organization, or other groups of persons which received contributions or made expenditures during a calendar year in an aggregate amount exceeding \$1,000. 2 U.S.C. § 431(d) and 11 C.F.R. § 100.14. 2 U.S.C. § 434 requires that the treasurer of a political committee file reports of receipts and expenditures with the Commission. 2 U.S.C. § 433 requires that each political committee file a statement of organization with the Commission.

The application of any of the approved reasonable methods of allocation of GOTV activity would most probably result in a determination that the respondent committee, the Executive Committee, was a political committee under the Act prior to the 1979 amendments to the Act. As the Executive Committee transferred a substantial amount of funds to county committees during 1978 for apparent GOTV activity, and because it transferred \$2,100 to the Kanawha County Democratic Executive Committee, a registered committee, during 1978, the General Counsel recommends that the Commission find reason to believe that the West Virginia State Democratic Executive Committee violated 2 U.S.C. §§ 433 and 434.

Based on the foregoing analysis, the Federal Election Commission has found:

1) Reason to Believe that the West Virginia State Democratic Executive Committee violated 2 U.S.C. §§ 433 and 434.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

D-675

MEMORANDUM

MARCH 23, 1980

TO : OFFICE OF GENERAL COUNSEL  
THROUGH: ORLANDO B. POTTER *OBP*  
FROM : TOM HASELHORST *TH*  
SUBJECT: FIVE REFERRALS--WEST VIRGINIA COMMITTEES

Please find attached five referrals for the following committees:

West Virginia Democratic Executive Committee (WV)  
1976 Logan County Democratic Campaign Committee (WV)  
Committee for a Better Logan County (WV)  
Mingo County Democratic Executive Committee (WV)  
Independent Democrats Committee (WV)

These committees are unregistered. During the course of performing its duties, the Audit Division noted that these committees may have expended funds for get-out-the-vote and voter registration efforts.

Because of the amount of funds involved, the Audit Division referred these matters to the Reports Analysis Division for further action as necessary.

The Reports Analysis Division reviewed the matters along with the correspondence between the Audit Division and the Office of General Counsel. We noted that in handling these matters, we should receive further guidance from your Office and/or the Commission. The guidance was felt necessary because:

1. The policy regarding possible allocation of GOTV and voter registration expenses was formulated through an Advisory Opinion (1978-10).
2. The method of allocation presented in AO 1978-10 does not necessarily apply to unregistered committees which have single accounts.
3. The method which may be available to these committees for determining the proper allocation necessary has not been fully addressed by the Commission. This method is the ballot position method which involves establishing a proportion for allocation based upon the number of Federal candidates and total candidates within the area of the activity. However, the relevant AO's are inconsistent in the formulation and application of the methods.

Specifically:

- a) In some cases, the proportion is based upon the number of candidates on the ballot; in other cases, the proportion is based upon the number of offices on the ballot.
  - b) In some cases the number of Federal offices had to receive an additional weighting prior to the determination of the proportion; in other cases, no additional weighting was required.
  - c) In one case, the number of total offices was defined in terms of Federal offices and comparable State offices; in other cases, the number of total offices was defined as the total number of offices-- Federal, State, and local combined.
4. The Commission has had no opportunity to address this Division's proposals for the Regulations which involve allocation of expenses.
5. The Division believes that we do not have the required guidance in this area to respond to these committees' questions once they have been notified of their required registration, if in fact they are required to register.

As the attached Memoranda and Memos to the File will indicate, we have attempted to receive guidance concerning allocation. Having received no guidance, we believe that this Commission and these committees will be better served were these matters to be addressed by the Commission in the form of MUP's.

In order to assist you in your consideration of these matters, we here attach relevant information regarding allocation of such expenses, as follows on the next pages.

Advisory Opinions

Attachment

AO 1978-10

1

Statement of decision that voter registration and get-out-the-vote expenses may be allocated between Federal and non-Federal accounts. Please note that this opinion states that these expenses may be allocated in the same manner as other general party expenditures. However, the methods provided in 11 CFR 106.1(e) and the September, 1977, guideline are predicated upon the existence of segregated accounts. Thus, it would appear that a "ballot position" method would be required.

AO 1976-72

2

This opinion provides for a method of allocation of party administrative expenses which is based upon ballot position, i.e. ratio of Federal offices on the ballot to the total number of offices on the ballot. However, the number of Federal offices is required to receive additional weighting than do the other offices. The amount of additional weighting is not specified.

AO 1978-28

3

This opinion addresses the question of allocation for an unregistered committee which registered with FEC in order to obtain the AO on the question. The Commission stated that a 10% allocation for Federal offices was reasonable in a situation in which there are on the ballot:

1. 1 Federal candidate; and
2. 6 Statewide offices; and
3. 7 County wide offices; and
4. 13 Legislative offices.

In Footnote #2 in the opinion, it is stated that the following method would also be reasonable:

The ratio of number of ballot positions for Federal office in next election to the number of positions for comparable State offices in the next election.

Please note that no weighting for Federal offices appears to be required as this method is written, and that the only other offices considered in the formula are "comparable State offices."

AO 1978-102

4

This opinion involves allocation for such expenses made by a union. The ballot position method is provided as follows:

In this situation the Commission is of the opinion that a reasonable basis for allocation would be to determine the ratio of the number of Federal candidates seeking election in the areas reached by the announcement, to the total number of all 1978 candidates--Federal, State, and local--in the same area...

Please note that no additional weighting is required in this situation. However, the ratio is based upon the number of

Page Four

Federal candidates to all candidates, and not the number of Federal offices on the ballot to the number of all offices on the ballot. Further, the number of local candidates is taken into account, whereas this was not included in AO 1978-28, Footnote #2.

See Next Page for Memoranda and Memos to the File List



Memoranda & Memos to the File

Attachment

1. February 5, 1979 5  
Registration of Political Committee  
Bob Costa/Joe Stoltz to Bill Oldaker
2. February 12, 1979 6  
Unregistered Political Organization  
Bob Costa/Joe Stoltz to Tom Haselhorst
3. May 29, 1979 7  
Registration of Political Committee-West Virginia  
William Oldaker to Bob Costa  
  
Please note that this memo calls for an allocation method  
to be devised. A proposal for this was submitted to OGC  
on July 13, 1979. See below.
4. May 31, 1979 8  
Registration of Political Committee  
Bob Costa/Joe Stoltz to Tom Haselhorst
5. July 13, 1979 9  
Allocation of Expenses by Party Committees  
Bob Costa/Tom Haselhorst to William Oldaker
6. August 20, 1979 10  
WV State Democratic Executive Committee-unregistered  
Memo to the File: Werfel
7. September 11, 1979 11  
Note from Orlando B. Potter  
  
The letters were prepared and submitted to Potter for  
signature. This is his note to RAD regarding required  
backup for the letters.
8. November 7, 1979 12  
Allocation/West Virginia Committees  
Memo to the File: Greevy
9. January 22, 1980 13  
Allocation  
Memo to the File: Greevy
10. January 25, 1980 14  
Comments on Revision of the Regulations  
Tom Haselhorst to Office of General Counsel

Only that portion involving 11 CFR 106.1(e) is here included.

THE REFERRALS ARE ATTACHED AS ATTACHMENTS 15-19



The Act and Commission regulations contemplate the making of independent expenditures by political committees. See 2 U.S.C. §431(p), 434(b)(13). Section 431(p) defines an "independent expenditure" as:

an expenditure by a person expressly advocating the election or defeat of a clearly identified candidate which is made without cooperation or consultation with any candidate or any authorized committee or agent of such candidate and which is not made in concert with, or at the request or suggestion of, any candidate or any authorized committee or agent of such candidate.

An expenditure which qualifies as an "independent expenditure" does not result in a contribution (in kind or otherwise) to any candidate for Federal office and would not have to be reported by any candidate named in connection with the expenditure. Furthermore, an "independent expenditure" would not be subject to contribution limits as a contribution to any candidate. See 2 U.S.C. §441a(a)(7) and §109.1(c) of Commission regulations.

If, as you have stated, the expenditure by Environmental Action's Dirty Dozen Campaign Committee was made without "cooperation or consultation" with you, your authorized committee or an authorized agent, it is the Commission's opinion that, as to your campaign, the expenditure would qualify as an "independent expenditure" under 2 U.S.C. §431(p). Thus, your campaign committee would not be required to report the expenditure in any manner. Nor would the expenditure be subject to contribution limits as a contribution to your campaign. The Commission expresses no opinion regarding the manner in which the described expenditures were reported by the Dirty Dozen Campaign Committee.

This response constitutes an advisory opinion concerning the application of a general rule of law stated in the Act, or prescribed as a Commission regulation, to the specific factual situation set forth in your request. See 2 U.S.C. §437f.

Dated: August 28, 1978.

[§5340] AO 1978-10: Allocation of Costs for Voter Registration

[Costs for a voter registration drive or get-out-the-vote campaign involving both state and federal candidates should be apportioned between the two types of elections. Such expenses are considered contributions if the effort is specifically aimed at the election of the federal candidate.] Answer to George Van Riper, Executive Director, Kansas Republicans, 501 Jefferson, Suite 22, Topeka, Kansas 66607.

This responds to your letters of February 3 and March 29, 1978, requesting an advisory opinion concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act") and Commission regulations to various expenditures of the Republican State Committee of Kansas ("State Committee").

Your letter of February 3 asks whether expenditures (hiring of staff, production and mailing of printed material, media advertising) to advocate the defeat of candidates for Federal office who are Democrats, are subject to limitation under the Act and Commission regulations if made at a time before the identity of all your Republican candidates for Federal office is known. The Commission decided that this question should be addressed separately. It will be considered further at the Commission's August 31 meeting.

Your letter of March 29, 1978, poses three questions concerning the allocation of expenses incurred by the Kansas Republican party for voter registration and get-out-the-vote drives, presumably to be conducted this election year when 6 Federal offices (5 House and 1 Senate) will be on the November ballot as well as 6 State executive offices (elected on statewide basis including Governor, Lieutenant Governor, Secretary of State, Attorney General), 5 seats on the State school

board (elected on district basis) and 125 seats in the State legislature (elected on district basis). You ask:

- (1) Is a voter registration drive allocable as a contribution to a candidate?
- (2) If a get-out-the-vote effort contacts voters on behalf of non-Federal candidates only, do the expenses of this effort have to be paid for from a Federal account?
- (3) If a part of such an effort is in behalf of Federal candidates, does the entire cost have to be paid from a Federal committee?

It is the Commission's opinion that the costs of registration and get-out-the-vote drives by the Kansas Republican Party should be allocated between Federal and non-Federal elections in the same manner as other general party expenditures. (See 11 CFR 106.1(c) and 106.1(e)). That portion of the costs allocable to Federal elections under the above allocation must come from funds contributed in accord with the Act - that is, funds contributed in accordance with the limitations and prohibitions contained in 2 U.S.C. §441a, 441b, 441c, 441e, 441f and 441g. (See 11 CFR 102.6(b)). The costs allocable to non-Federal elections may be paid out of Party funds raised and expended pursuant to applicable Kansas law. This conclusion modifies and supercedes the Commission's responses to Advisory Opinion Requests 1976-72 and 1976-83, issued respectively on October 6 and 12, 1976.

It is also the Commission's view that with respect to an election in which there are candidates for Federal office, expenditures for registration and get-out-the-vote drives need not be attributed as contributions to such candidates unless the drives are made specifically on their behalf. (See 11 CFR 106.1). For example, if the purpose of the drive advocates the election of a candidate or candidates for Federal office, then the cost must be attributed to that candidate or candidates for limitation and reporting purposes. See 2 U.S.C. §441a(a) and 441a(d). However, the Party may use printed material in a voter registration (or get-out-the-vote) drive which identifies candidates for Federal office without allocating any costs to particular candidates, if those materials are within the elite card or sample ballot exemption. 2 U.S.C. §431(e)(5)(E) and §431(f)(4)(G). If financed by a reporting political committee, the amounts spent for materials within the exemption need to be reported as a "Disbursement for exempt sample ballot expenses" in order to account for all cash outlays of the political committee. (See 11 CFR 104.2(b)).

This response constitutes an advisory opinion concerning the application of a general rule of law stated in the Act, or prescribed as a Commission regulation, to the specific factual situation set forth in your request. See 2 U.S.C. §437f.

Dated: August 29, 1978.

\*/ Commission records indicate that the Kansas Republican Federal Campaign Committee was another registered political committee of the Kansas Republican Party but has now terminated. Your request is made on behalf of the State Committee which is the Party's principal Federal campaign committee and has been registered under the Act for several years.

DISSENTING OPINION OF  
COMMISSIONER THOMAS E. HARRIS  
TO ADVISORY OPINION 1978-10

The Commission has decided today that the Kansas State Republican Party may allocate or apportion its expenditures in connection with a state-wide registration and get-out-the-vote drive between state and federal candidates, and may pay

and union treasury funds only for "non-partisan registration and get-out-the-vote campaigns by a corporation aimed at its stockholders and executive or administrative personnel and their families, or by a labor organization aimed at its members and their families;" (see §114.1(a)(2)(ii) of the Commission's proposed regulations, copy enclosed). The only exceptions to this general rule are contained in §114.4(d) which allows corporations and labor organizations to support a nonpartisan voter registration drive if:

(i) the corporation or labor organization jointly sponsors the drives with a civic or other non-profit organization which does not support or endorse candidates or political parties and if the activities are conducted by the other organization; and

(ii) These services are made available without regard to the voter's political preference.

(2) A corporation or labor organization may donate funds to be used for nonpartisan registration and get-out-the-vote drives to civic and other nonprofit organizations which do not endorse candidates or political parties.

Thus, even though the Illinois law apparently permits corporate contributions for State elections, corporate/union treasury funds may not be used to fund any portion of a registration or get-out-the-vote drive conducted by a political party.

You state that you have two accounts; one is "restricted" and contains, among others, corporate contributions; the other is "unrestricted" and contains personal and partnership checks, presumably not in excess of the contribution limitations of 2 U.S.C. §441a. You state that "[a]llmost all expenses to date have been paid from unrestricted funds," and you ask how funds from the restricted account can be transferred to the unrestricted account to reimburse it for disbursements made for non-Federal candidates and general overhead expenses.

Section 102.6(b) of the proposed regulations provides in relevant part that committees supporting Federal candidates "may not receive transfers from an account or committee established by a State committee . . . except from a committee or account" receiving only contributions permissible under the Federal Election Campaign Act of 1971, as amended ("the Act").

Therefore, you may not transfer funds from your "restricted" account to your "unrestricted" account, since the "restricted" account contains funds which may not be properly contributed under the Act, see 2 U.S.C. §441b. There is no limitation, however, on funds being transferred from the "unrestricted" to the "restricted" account. You may, therefore, draw a check on each account reflecting the allocation for a particular overhead expense, or you may transfer funds from the "unrestricted" to the "restricted" account, and draw one check on the "restricted" account for the total expenditure.

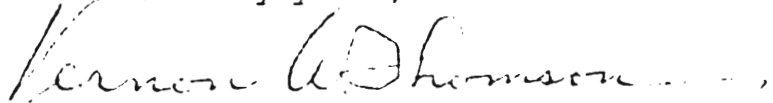
Notwithstanding the foregoing conclusion, and in view of the transition that will be necessary to conform your committee organization to the requirements of §102.6 the Commission will allow a one-time adjustment of the described expenses allocable to your Federal activities based on the foregoing formula. In other words, at the time (before the close of the next reporting period) you determine the allocable Federal share of the described overhead and general campaign expenses incurred since January 1, 1976, that amount may be reimbursed to the Federal committee from the "restricted" account if the past practice of the State committee would have been to pay only the allocable Federal share from the "unrestricted" account. In the future the "restricted" account must become the State committee, assuming you select the alternative set forth in §102.6(a)(2)(i) which is the only lawful structure by which the State committee may continue to receive corporate funds if the State party desires to continue to benefit Federal candidates through its general party activity.

It should be further noted that §102.6 establishes two permissible organizational structures for political committees: a committee receiving contributions designated for, and contributing to, Federal candidates; or a committee receiving contributions designated for, and making contributions to, both Federal and State candidates. In both cases, the committee may not receive any funds unlawful

under the Act, such as funds from a corporate or labor organization treasury, or contributions in excess of the limits in 2 U.S.C. §441a, see also Part 110 of the proposed regulations. Unless it establishes a separate committee for State and local candidates, the Illinois Republican State Central Committee may not receive corporate contributions as described in your letter.

This response relates to your opinion request but may be regarded as informational only and not as an advisory opinion since it is based in part on proposed regulations of the Commission which must be submitted to Congress. The proposed regulations may be prescribed in final form by the Commission only if not disapproved either by the House or the Senate within 30 legislative days from the date received by them. 2 U.S.C. §438(c). The proposed regulations were submitted to Congress on August 3, 1976.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Vernon W. Thomson", is written over a light-colored background.

Vernon W. Thomson  
Chairman for the  
Federal Election Commission

Enclosure



# ILLINOIS REPUBLICAN



# STATE CENTRAL COMMITTEE

DAVID E. BROWN  
TREASURER and VICE CHAIRMAN  
State Central Committeeman  
10th Congressional District

RECEIVED  
OCT 25

Please reply to:  
Kemper Plaza:  
Long Grove, Illinois 60049  
312/540-2528

10th Congressional District office: 545 Lincoln Avenue, Winnetka, Illinois 60093 (312/446-2700)

October 22, 1976

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

RE: AOR 1976-72

Gentlemen:

763200

AOR 1976-72

The formula which was approved in your letter of October 6 for the allocation of administrative expenses of our State Committee of 1/3 or 33% to federal and 2/3 or 67% to state is a little heavy on the federal expenditure side. (Assume 33/67% ratio is in compliance with 1/3-2/3 ratio and it gets away from the fraction.) However, it is important that we have a definite approved formula upon which to base past and future allocations and we will be governed accordingly.

An analysis from our financial report for the first 9 months of 1976 shows that our administrative expenses totalled \$100,871.33. These expenses were paid 100% from contributions permitted by the Federal Election Law.

As indicated in my letter of August 13, the State Committee has an account called "State & Local Candidates" into which we deposit corporate and partnership contributions. For the first 9 months of this year, we have paid out of the State & Local Account \$20,613.83 for administrative expenses of our Committee.

Now, if we apply the 33-67% ratio to the Federal Account, we find that the State & Local Account owes the Federal Account \$67,583.79; applying this ratio to the State & Local Account, we find that the Federal Account owes the State & Local Account \$6,802.56.

October 22, 1976

Page Two

Combining these figures, we arrive at a balance due the Federal Account from the State & Local Account of \$60,781.23 as of September 30, 1976.

Our fund balances as of September 30, 1976 were:

Federal Account	\$ 8,683.83
State & Local Acct.	16,725.92

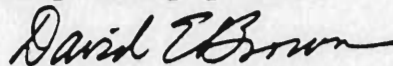
As I understand the law, there is no prohibition on our federal fund paying within the maximum limitation any of the political expenses even transferring funds to the State & Local Account. But there is a prohibition on the State & Local Account depositing money into the Federal Account.

Since the State & Local Account has corporate funds, when State & Local pays political expenses which involve federal candidates, it will have to be appropriately reimbursed from our Federal Account.

If State & Local paid an expense item that was an administrative expense, that would require a 33% reimbursement from the Federal Account. If State & Local paid an item that was not an administrative expense and fully attributed to federal candidates, it would be reimbursed 100% by the Federal Account. However, one of the ways in which it can be reimbursed is an offset to the balance which State & Local owes to the Federal Account.

I assume that this procedure as outlined is acceptable and within 30 days after the end of this year and within 30 days every six months thereafter, I will write you a commentary on the status of the balance due by State & Local to Federal.

Very truly yours,



David E. Brown  
Treasurer & Vice Chairman

DEB/svr





FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

October 5, 1976

MEMORANDUM TO: The Commission  
FROM: Neil Staebler *1/5*  
SUBJECT: AO 1976-72

Attached for transmittal to the Commission Secretary and for your information, please find my dissenting opinion to that portion of AO 1976-72 which forbids the use of corporate and union treasury money to pay the non-Federal portion of the costs of registration and get-out-the-vote drives, where such money is legal under applicable state law.

*See AO & AOR Notebook*



AO 1976-72

DISSENTING OPINION OF COMMISSIONER STAEBLER

I must emphatically dissent from that portion of AO 1976-72 which forbids the use of corporate and union treasury money to pay the non-Federal portion of the costs of political party registration and get-out-the-vote (GOTV) drives, where such money is legal under applicable state law.

By this decision, the Commission reverses a Commission determination of long-standing, on which many party committees and other persons have justifiably relied. The rule adopted is unsupportable, unenforceable, and unwise. It will result in great confusion and numerous unintentional violations of the law by party committees and 441b organizations.

The Federal Election Campaign Act reaches only Federal activity. It cannot constitutionally reach state and local activity. The majority opinion begins by assuming that all the costs of state and local party committees for registration and GOTV activities are Federal. But that is the very proposition which is at issue, and which is resolved by the majority in a manner contrary to the Commission's

prior opinions. The Commission has expressly ruled that a portion of the costs of such activities are non-Federal and may be paid with monies legal under state law.<sup>1/</sup> To the state portions of the costs, therefore, the Federal statute and the arguments of the majority interpreting the statute have no application. State law controls.

The Commission has specifically recognized that the principle of allocation [Part 106 of the Proposed Regulations] applies to expenditures having a purpose partly Federal and partly non-Federal; and has ruled that costs may be allocated accordingly, with no part of the costs of the activity counted twice. See for example, AO 75-21, OC 75-116, O/R 715(76). The latter, issued August 31, 1976, after the effective date of the 1976 amendments and transmittal of the Commission's 1976 Proposed Regulations to Congress, specifically recognized that the cost of registration and get-out-the-vote activities not attributable under Part 106.1(c) of the Regulations to an individual candidate would nonetheless be

<sup>1/</sup>In AO 1975-21, the Commission held by a 4 to 1 vote that:

"The...issue is whether [a party committee] may use [treasury funds allowed under applicable state law].

...A voter registration drive has a relation to Federal elections as well as state and local. Therefore, [contributions from treasury funds allowed under applicable state law] may be made only to the extent that the drive relates to state and local candidates. That extent may be determined on the basis of [an] allocation formula [based on the ration of Federal contributions to total contributions or, from the regulations, any, or other reasonable basis]." (Emphasis added)

allocable between Federal and non-Federal purposes.<sup>2/</sup>

The Opinion of Commissioner Harris, which urges the majority position, argues that §441b(b) (2) (B) of the statute forbids corporations to spend treasury money to pay the costs of voter registration and GOTV drives except for non-partisan drives conducted internally (or externally with the co-sponsorship of civic groups). He is correct to the extent that the costs of such a drive are "in connection with" a Federal election. But as previously discussed, the Commission in AO 75-21 and O/R 715(76) has held that a certain portion of the costs of such drives may be considered to be spent "in connection with" state and local elections, not Federal; and that funds legal under state and local law may be used to pay the non-Federal portion of the costs.

The supporting memorandum for the amendment offered by Commissioner Thomson and adopted by a majority of the Commission argues in addition to the Harris reasoning that the Commission has changed its position from AO 1975-21 because an early draft of the regulations contained the explanation that §114.4 of that draft constituted a partial retreat

<sup>2/</sup> In O/R 715, the Commission held unanimously that:

"[A]lthough a registration get-out-the-vote drive may not be allocable among or between candidates, party committees which have established Federal campaign committees may consider a portion of the expenditures made for the purpose of influencing a Federal election and a portion made for the purpose of influencing a State election. The party committee may divide the costs on a reasonable basis". (Emphasis added)

from AO 1975-21. That language was not, however, in the final version of the explanation and justification sent to Congress. The language of the Conference Report dealing with use of treasury monies in registration and GOTV activity reaches only Federal activity and not activity held by the Commission to be non-Federal. The language is contrary to my understanding of the meaning of the regulations as the Commission adopted them, and is of no legal effect whatever.

Congress was aware of AO 1975-21 at the time it considered both the 1975 and 1976 sets of Commission Regulations and the 1976 amendments to the Act; yet it made no comment on allocation to non-Federal purpose nor any effort to forbid such allocation. No change affecting the Commission's allocation decisions was made in any relevant section of the statute. There is, in short, no support for the position that a change from the Commission's position in AO 1975-21 has been required or even suggested by Congress.

Practical considerations also argue against the majority position. To forbid any allocation of general voter registration and GOTV drives to a non-Federal purpose would create far more problems than it would solve. For example, would the Commission consider registration and get-out-the-vote drives conducted by a state or local candidate to be "in connection with" Federal elections so as to forbid the use of contributions to the candidate legal under state law in that drive, since registrants from such a drive will presumably vote for Federal as well as state candidates?



If not, how would the majority distinguish that situation from similar activity by a state party? Would the Federal statute forbid use of money legal under state law in registration drives conducted prior to elections in which no Federal candidates are on the ballot, since once voters are registered, they stay registered for some time into the future and may vote in elections in which Federal candidates are on the ballots? Where indeed can the line be drawn if the total costs of such activities are deemed to be "in connection with" Federal elections?<sup>3/</sup>

Political parties, corporations, and labor organizations have justifiably relied on the Commission's prior opinion in AO 1975-21 (and its clear implied restatement O/R 715) for the last year, both for making contributions and expenditures and for planning registration and get-out-the-vote activities. To change the Commission's interpretation of the law at this late date would be unconscionable. There is no way in which the new policy can be promulgated and implemented between now and the election. It will result in total confusion, and massive non-compliance. It will be virtually impossible to unravel the many transactions which are

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<sup>3/</sup> The entire cost of joint campaign appearances and materials would by that reasoning be "in connection with" Federal elections. Indeed, to the extent that even activity conducted exclusively on behalf of local candidates affects voter turnout and issues discussion in an election in which Federal candidates are on the ballot, it too could be deemed "in connection with" a Federal election.

made illegal by forbidding use of such monies if the rule is applied literally.

In short, I do not believe that my fellow Commissioners have focused on the practical impact of their decision. I will address myself briefly to how the majority ruling ought to be applied.

Since the majority opinion reverses a well-established policy of the Commission, I believe the application of the new rule set out in the majority opinion can be prospective only. I would understand the Commission's General Counsel and at least two of the Commissioners who voted for the majority opinion to agree.

In view of the long-term reliance of party organizations on the prior opinion, I believe that, in this context, prospective application of the rule should be interpreted to exclude from enforcement action not only situations which monies formerly permitted have already been spent but also the situations in which commitments for financing registration and GOTV activities from §441b treasury monies have been made on or before the date of the opinion. Party committees justifiably relying on the former rule should not be forbidden to use treasury monies already committed for the 1976 November general election, nor should they be penalized for doing so. Contributing organizations should also be permitted to fulfill pledges already made to finance such activity.

To apply the law otherwise would be grossly disruptive of the political process, would reduce voter participation, weaken political parties, and create an enforcement nightmare for committees and for the Commission.



This response constitutes an advisory opinion concerning the application of a general rule of law stated in the Act, or prescribed as a Commission regulation, to the specific factual situation set forth in your request. See 2 U.S.C. §437f.

Dated: September 19, 1978.

\*/ If the proceeds of contributions made by credit card are not remitted to the Committee by the payor bank within approximately the same time period that contributions by check are credited to the bank accounts of the Committee, then the Committee may be required to report the credit card transaction on Schedule C of FEC Form 3 as an outstanding debt or obligation owed to the Committee as of the date the card was used. 2 U.S.C. §434(b)(12), §436(c); see also §104.8 of Commission regulations and reporting instructions on reverse side of Schedule C, FEC Form 3.

[§5358] AO 1978-28: Registration for Get-Out-the-Vote Drive

[Although part of the expenses of a get-out-the-vote drive must be attributed to federal candidates, a county committee so engaged does not have to register with the Federal Election Commission where the amount so attributable is less than \$1,000. Answer to Thomas A. Collins of Guild, Hagen & Clark, Ltd., 102 Roff Way, P.O. Box 2838, Reno, Nevada 89501.]

This refers to your letter of April 19, 1978, requesting an advisory opinion on behalf of the Washoe County Republican Party Federal Committee as to whether the Federal Election Campaign Act of 1971, as amended ("the Act"), requires registration and reporting by the Committee if its activities are limited to conducting a get-out-the-vote drive around election day in November.

You have stated that the Washoe County Republican Party contemplates a get-out-the-vote drive just before election day which will consist largely of a telephone bank operation. This activity is similar to that conducted in the past and will involve contacting Republican voters who have not yet voted on election day to encourage them to vote. The Party has registered the Federal Committee only because you have heard that the Commission requires a local party committee to register in order to conduct get-out-the-vote activity in a Federal election year. Your letter also explains that the County party organization:

"is going to only directly help and support local legislative, commission and judicial candidates. There is no plan at all at this time to help any Federal candidates. At this time in Nevada there would be only one possible Federal candidate and that would be for Nevada's sole seat in the House of Representatives. Therefore, any effect upon a Federal race would be very minimal and indirect, amounting to less than 10% of the expenditure made. At this time we do not plan to raise or spend more than \$1,000 for a Federal candidate. Actually at this time it is not our plan to spend any money directly on a Federal candidate."

You ask whether expenditures of the Washoe County Republican Party for its 1978 get-out-the-vote drive are subject to the Act and Commission regulations with the result that the Party would have to register as a "political committee," pursuant to one of the alternatives in §102.6(a) of Commission regulations, if its expenditures for the drive will exceed \$1,000.

The Act defines the term "expenditure" to include any "purchase, payment, distribution" made for the purpose of influencing the nomination or election of any person to Federal office. 2 U.S.C. §431(f). Any committee, association, or organization which makes "expenditures" during a calendar year in an aggregate

amount exceeding \$1,000 is a "political committee" as defined in 2 U.S.C. §431(d) and is required to register with the Commission within 10 days after its organization or, if later, 10 days after it has information causing the committee to "anticipate" it will make expenditures in excess of \$1,000.1/ 2 U.S.C. §433(a); see also §102.1(a) of Commission regulations. The Commission has recently held that expenses of a political party organization for a get-out-the-vote drive in a Federal election year are, at least in part, for the purpose of influencing the election of persons to Federal office even though the drive is not conducted expressly or exclusively on behalf of candidates for Federal office. Advisory Opinions 1978-50 and 1978-10, copies enclosed. The Commission further concluded that the amount of get-out-the-vote expenses attributable to Federal election purposes (required to be paid from a registered and reporting "political committee" that accepted only those funds permissible under the Act, 2 U.S.C. §441a through §441(g) should be computed on a "reasonable basis" under §106.1(e) of Commission regulations.2/

As respects your specific factual situation, you have estimated that the effect of the County party's 1978 get-out-the-vote drive upon a Federal race in Nevada (the only one in 1978 is for an at-large seat in the United States House of Representatives) would be "very minimal and indirect, amounting to less than 10%" of the expenses for the drive. In a supplemental letter dated September 21, 1978, you indicated that total expenses for the drive are budgeted at \$1,400. Accordingly, if your estimate is made on a reasonable basis and actual expenses are \$1,400, the \$140 amount allocable to Federal election purposes would not by itself cause the County party organization to become a "political committee" under the Act. It will be necessary, however, for the county party to defray the Federal election portion of the expenses from funds which are lawfully contributed under the Act.3/

The 10% estimate is considered reasonable since the Commission has learned that the 1978 general election ballot in Washoe County will include candidates for 6 Statewide executive offices, at least 7 county-wide executive offices, and approximately 13 State legislative offices.

Your supplemental letter also explains that the telephone contacts to be made in the drive will not include any identification or mention of a candidate for Federal office. Therefore, it will not be necessary for the 10% Federal election portion to be treated as a party expenditure on behalf of the general election campaign of a specific candidate for Federal office under 2 U.S.C. §441a(d). See AO 1978-10 and AO 1978-50.

In light of this opinion you should terminate the registration of the Washoe County Republican Party Federal Committee if the County Party's intentions as to its participation in a 1978 Federal election, as well as its actual activity in that respect, do not involve any expenses other than the \$1,400 for the described get-out-the-vote drive.

This response constitutes an advisory opinion concerning the application of a general rule of law stated in the Act, or prescribed as a Commission regulation, to the specific factual situation set forth in your request. See 2 U.S.C. §437f.

Dated: September 29, 1978.

1/ A committee or other organization may also become a "political committee" under the Act if it receives "contributions" exceeding an aggregate amount of \$1,000 during a calendar year. The anticipation of contributions aggregating over \$1,000 in a calendar year similarly invokes the requirement to register under 2 U.S.C. §433(a).

2/ The Commission noted that, in addition to the method stated in §106.1(e), two other allocation formulas were considered reasonable:

(1) ratio of funds received by reporting Federal political committee to all funds received by party organization for both Federal election and State election purposes; and

(11) ratio of number of ballot positions for Federal office in next election to the number of positions for comparable State offices in the next election. See the December 1977 Guideline and the Commission's response to Advisory Opinion Request 1976-72 for a more extensive explanation, copies enclosed.

3/ In particular, contributions from treasury funds of corporations, national banks, and labor organizations are prohibited under 2 U.S.C. §441b, as are contributions from Government contractors under §441c and foreign nationals under §441e.

[§5359] AO 1978-61: Solicitation of Executives of Franchisees

[The political action committee of a franchisor may solicit the executives of franchisees because of the strict control maintained by the franchisor.]  
Answer to Robert D. McDonald, 1666 K Street, N. W., Suite 611, Washington, D. C. 20006.]

This responds to your letter of August 9, 1978, with enclosures (including a letter dated August 3, 1978, from William E. Anderson II), requesting an advisory opinion concerning the application of the Federal Election Campaign Act of 1971, as amended ("the Act") and Commission regulations to the solicitation of political contributions by Jerrico, Inc. ("Jerrico") or its separate segregated fund from the executive and administrative employees of its franchisees.

These letters state that Jerrico franchises and operates restaurants directly and through its wholly owned subsidiary, Long John Silver's, Inc. ("LJS"). Jerrico franchises Jerry's restaurants and through LJS franchises Long John Silver's Seafood Shoppes. The franchisees are required through their franchise agreements to comply with certain standards and policies described as "a comprehensive system for the uniform retailing of quality food and beverage products." Material breach of the franchising agreement results in immediate termination. The agreement imposes stringent restrictions on the transferability of franchisees and requires Jerrico's approval for any assignment or transfer by franchisees during their life and upon their death.

The comprehensive system for retailing food and beverage products mentioned above includes many detailed specifications concerning all aspects of the operation of the restaurant. These include food preparation, handling, staffing, service and building maintenance and design. Thus the franchise agreement requires that the franchisees be maintained in conformity with Jerrico's standards in adherence with their policies, practices and procedures.

You requested whether Jerrico or a separate segregated fund established by it may properly solicit contributions from the executive and administrative employees of its franchisees. It is the opinion of the Commission that Jerrico's continuing control and direction over the business policies, practices and procedures of its franchisees, as well as the nature and extent of the franchisees' contractual obligation to Jerrico makes Jerrico and its franchisees (including LJS franchisees) affiliates within the meaning of the Act and Commission regulations. See Advisory Opinion 1977-70, copy enclosed. Accordingly, the Commission agrees that Jerrico may solicit contributions to its separate segregated fund from the executive and administrative personnel of Jerrico's and LJS's franchisees and their families. 11 CFR 114.5(g)(1); see also 114.1(c). In conducting these solicitations, Jerrico or its fund must conform to the procedures set forth in Commission regulations for the solicitation of executive and administrative personnel. 11 CFR 114.5(a). If any franchisee of Jerrico or LJS establishes a separate segregated fund, the rule against proliferation of political committees, 2 U.S.C. §441a(a)(5), and Commission regulations on contributions of affiliated committees, would apply. See 11 CFR 110.3.

This response constitutes an advisory opinion concerning the application of a general rule of law stated in the Act or prescribed as a Commission regulation to the specific factual situation set forth in your request. See 2 U.S.C. §437f.

As noted in responses to Questions 2 and 4 above, the State Committee would not be required to defray the costs of the subject activity from its registered and reporting Federal account, i.e. with funds subject to all the limitations, prohibitions and reporting requirements of the Act (see 2 U.S.C. §§434, 441a, 441b, 441c, 441e, 441f and 441g). However, since these costs may not be paid with funds containing contributions from any of the sources included in §441b or §441e, if the State Committee's regular non-Federal account contains contributions from corporate, union or national bank general treasury funds, or from foreign nationals, it would be necessary for the State Committee to establish a separate account for defraying the costs of the suggested activities. Funds put into such a special account would not be subject to the contribution limits of §441a, nor would the receipts or disbursements of such an account be reportable under the Act.

6. Are the receipts and expenditures incurred by a county attributed to the State Committee, or are they a separate and distinct activity and must be filed as such?

The Commission has concluded above that since funds received and disbursements made for the suggested activities are not "contributions" or "expenditures" within the meaning of §§431(e) and (f), they need not be reported unless paid from the Federal account of the registered Federal campaign committee of the State Committee. Similarly, payment of the costs of these activities by a county committee would be reportable only if the county committee is a "political committee" within the meaning of 2 U.S.C. §431(d) and the payment is made from such political committee's Federal account. Such payments would not in and of themselves trigger a registration obligation on the part of any unregistered party committee which undertakes such activity.

This response constitutes an advisory opinion concerning the application of a general rule of law stated in the Act, or prescribed as a Commission regulation, to the specific factual situation set forth in your request. See 2 U.S.C. §437f.

Dated: April 20, 1979.

- 1/ Rule 6 of the Delegate Selection Rules for the 1980 Democratic National Convention indicates that the purpose of the suggested State Affirmative Action Programs is "To encourage full participation by all Democrats, with particular concern for minority groups, Native Americans, women, and youth, in the delegate selection process and all Party affairs".

The Preliminary Call for the 1980 Democratic National Convention, issued by the DNC on December 8, 1978, states that in order to insure that the requirements of Rule 6 are carried out each plan shall address itself to: (1) efforts to be made to publicize information on eligibility to vote and become a delegate, the time and location of each stage of the delegate selection process and where to get additional information; (2) organizational efforts, including financial and staff support, for the implementation of all requirements of the State Affirmative Action Plan; (3) educational efforts to encourage participation in the delegate selection process; and (4) establishment of Democratic constituency representation goals for the State Convention Delegation.

[§5397] AO 1978-102: Expenditures for Get-Out-and-Vote Ads

[Where a union paid for radio and television ads encouraging members to vote, those ads mentioning only state candidates would not be subject to the federal law while general ads would be, requiring allocation of expenses in order that the federal PAC could reimburse the union. Answer to Willard A. Esselstyn, Secretary Treasurer, Coal Miners Political Action Committee, 900 Fifteenth Street, N.W., Washington, D.C. 20005.]

This responds to your letter of December 15, 1978, as supplemented by your letter of February 12, 1979, requesting an advisory opinion on behalf of the Coal Miners Political Action Committee concerning the applicability of the Federal

Election Campaign Act of 1971, as amended ("the Act"), and Commission regulations to the financing of television and radio announcements encouraging members of the United Mine Workers ("UMW") to vote in the November 1978 elections.

According to your letter, during the period preceding the 1978 general election the United Mine Workers of America used general union treasury funds to finance television and radio announcements which were broadcast in several states. You state that these announcements were directed to UMW members "encouraging them to get-out-and-vote." In some cases these announcements mentioned and advocated support of specific candidates for State office. In other cases you say that the announcements were "non-partisan" in nature and did not advocate any particular party or candidate. In no instance were candidates for Federal office mentioned.

Enclosed in the February letter were transcripts of the radio and television get-out-the-vote advertisements as well as a tape recording of the radio announcements (1 minute). According to the transcripts (and the tape) the ads which you describe as nonpartisan did not mention, or indicate pictorially, support or opposition to any particular political party or candidate. Rather, in general terms the announcement talks to labor, advocates unity amongst union members, states that much was accomplished with the help of "friends" in political office, suggests that without union votes those "friends" could lose and then urges union members to vote on election day. In contrast to this general appeal, those spots which urged support of certain candidates for State office identified the "friends" of labor by mentioning their names, the offices for which they were running, and ultimately appealed for a vote for each of those candidates on November 7.

Specifically you ask the following:

- 1) Was it proper for us to consider this non-partisan activity permissible? If not, may we transfer voluntary funds from our political action committee (in the proper amount allocable to the Federal portion of the election) into our general treasury to come into compliance with the Act?
- 2) If allocation is necessary, may we apportion our costs by a simple ratio of the number of Federal elections per state in relation to the number of state and local elections, since our announcements would apply to all such elections?

The Commission considers the announcements supporting specific State candidates as outside the scope of the Act since, as to labor organizations, the prohibitions of §441b extend only to contributions and expenditures connected with an election of candidates to Federal office. Also, relevant definitions in 2 U.S.C. §431 are limited to influencing the nomination or election of persons to Federal office. See 2 U.S.C. §431(a) through (f).

The Act's general definition of "expenditure" specifically excludes "non-partisan activity designed to encourage individuals to register to vote, or to vote." 2 U.S.C. §431(f)(4)(B). The statute in §441b, however, subjects corporations and labor unions to stricter standards than individuals when Federal elections are concerned. Section 441b provides, in part, that it is unlawful for "any labor organization to make a contribution or expenditure in connection with" any Federal election - and although §441b(b)(2)(B) specifically contains an exemption for the use of general treasury funds to conduct nonpartisan registration and get-out-the-vote campaigns, the exemption is restricted to a campaign aimed at the labor organization's members and their families.

Accordingly, §114.4 of the Commission regulations which addresses nonpartisan communications places a labor organization under special constraints when engaging in nonpartisan activities connected with Federal elections which are not restricted to its members and their families. Section 114.4(d) specifically



addresses nonpartisan registration and get-out-the-vote drives and permits a labor organization to support such a drive if the labor organization jointly sponsors the drive with a civic or other nonprofit organization which does not support or endorse candidates or political parties and which conducts the non-partisan voting drive.

Since the get-out-the-vote campaign in question which reached the general public was sponsored solely by UMW, the activity was not conducted in conformance with Commission regulations. To be in compliance with the Act and regulations it is necessary that the cost of the get-out-the-vote announcements which did not specify a State candidate be allocated on a reasonable basis between Federal and non-Federal elections. (See Advisory Opinions 1978-50 [¶5353], 1978-28 [¶5358], and 1978-10 [¶5340] copies enclosed.) In this situation the Commission is of the opinion that a reasonable basis for allocation would be to determine the ratio of the number of Federal candidates seeking election in the areas reached by the announcement, to the total number of all 1978 candidates--Federal, State, and local--in that same area who were endorsed by the UMW or its PAC either to the general public or internally to union members. The resulting percentage should then be used to compute the portion of the expenses (only for those spots that did not identify any particular candidate, i.e. the "non-partisan" spots) that are regarded as Federal-election related. This amount should then be transferred from your political action committee (separate segregated fund) into the general treasury of UMW from which the full cost of the announcements was originally paid.

This response constitutes an advisory opinion concerning the application of a general rule of law stated in the Act, or prescribed as a Commission regulation, to the specific factual situation set forth in your request. See 2 U.S.C. §437f.

Dated: April 27, 1979.

[¶5398] AO 1979-10: Use of Union Bug

[The use of the union bug on campaign materials does not make such materials any more of an expenditure, and the use of the bug on materials mailed under the frank is outside of the campaign act. Answer to James Feltham, Administrative Assistant to Congressman Rhodes, U.S. House of Representatives, Washington, D.C. 20515.]

This responds to your letter of March 19, 1979, requesting an advisory opinion on behalf of Mr. Rhodes regarding the applicability of the Federal Election Campaign Act of 1971, as amended ("the Act"), and Commission regulations to the appearance of a "union bug" on a candidate's stationery or brochures. (The "union bug" indicates that the printing of material on which it appears was done in a unionized print shop.)

Specifically, you raise the issue of a "union bug that appears on a candidate's brochure or stationery" and whether "the bug violates 2 U.S.C. §431(f)(4) relating to reporting expenditures for commentary in periodic publications under the candidate's control." Stated another way, you ask whether the appearance of the "union bug" on candidate materials gives rise to an expenditure which, in turn, must be reported under the Act.

Implicit in a discussion of candidate brochures or stationery is the presumption that such brochure or stationery is campaign related; that is, it is used by the candidate or on the candidate's behalf in conjunction with a campaign for Federal office. If, in fact, those materials are campaign related their cost would be payments made for the purpose of influencing the nomination or election of a person to Federal office and would constitute expenditures as defined in 2 U.S.C. §431(f). As "expenditures," the payments are required to be reported under §434(b). Payments for these candidate brochures or stationery would be reportable expenditures regardless of whether a "union bug" appeared on them.





FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

February 5, 1979

MEMORANDUM

TO : BILL OLDAKER

THROUGH : ORLANDO B. POTTER  
STAFF DIRECTOR

FROM : *RC* BOB COSTA/JOE STOLTZ *JS*

SUBJECT : REGISTRATION OF POLITICAL COMMITTEE

The Audit staff recently completed an audit of the West Virginia State Democratic Telethon Committee ("the Telethon Committee"). Attached is a copy of the audit report which will be forwarded to the Commission subsequent to your analysis of the matters described below. (Attachment #1). The audit report contains the opinion that the Telethon Committee is not a political committee as defined by Section 431(d) of Title 2 of the United States Code. However, during the audit, a Telethon Committee official presented for the Audit staff's review the State reports and records of the West Virginia State Democratic Executive Committee ("the Executive Committee") (Attachment #2), an unregistered committee established to conduct non-Federal activities of the Democratic Party of West Virginia.

It is the opinion of the Audit Division, based upon the review of the records of the Executive Committee as outlined below, that the Executive Committee has engaged in Federal activity which would require it to register and report with the Commission.

Registration and Reporting By a Political Committee

Section 433(a) of Title 2 of the United States Code requires each political committee which anticipates receiving contributions or making expenditures during the calendar year in an aggregate amount exceeding \$1,000 to file with the Commission a statement of organization within 10 days following the date of the anticipation.



Section 434(a) of Title 2 of the United States code requires the treasurer of a political committee to file with the Commission reports of receipts and expenditure on prescribed or approved forms.

Our review of the State reports (Attachment #2) and records of the Executive Committee revealed that during November, 1976 ten (10) transfers totaling \$3,500.00 were made to two (2) unregistered county committees and eight (8) individuals for "election day expenses". Further, during October, 1978, 106 transfers totaling \$40,900.00 were made to 55 unregistered county committees for the same purpose.

According to the official that had presented the records, the Executive Committee had sought guidance from the Commission with respect to the handling of the "election day expense", and based upon information received, attached a memoranda to each transfer check informing the recipient committees and individuals of the restricted use of the amounts transferred (Attachment 3). Documentation concerning the communication with the Commission was not retained, and the official was unable to provide further information concerning it.

The official was of the opinion that handling the transfers in the above manner would exempt the Executive Committee from coming within the jurisdiction of the Commission.

It is the opinion of the Audit staff, based upon the information presented, that the transfers had been made for Get-Out-The-Vote activities. As such, according to Advisory Opinion 1978-10, the Executive Committee would normally be required to allocate the activity between Federal and non-Federal elections on a reasonable basis. It appears reasonable that the portion allocated for Federal elections would exceed \$1,000, in an aggregate amount or value, during a calendar year. Therefore, the Executive Committee would normally be required to register and report under Sections 433 and 434.

This matter is referred to your office for a legal analysis and further guidance. Any questions concerning this matter should be communicated to Ray Lisi or Charles Hanshaw on extension 3-4155.

Attachment as stated

## Statement of Receipts and Expenditures for Candidates, Agents, Treasurers or Committees

This statement is required to be filed according to the provisions of West Virginia Code §3-8-5 not less than 5 nor more than 10 days before the date of the Election with the Secretary of State, Charleston, West Virginia, for all offices to be filled or issues to be voted upon by the voters of a political division greater than a county. For all offices to be filled or issues to be voted upon by the voters of a county or district therein, file this statement with the County Clerk. For all offices to be filled or issues to be voted upon by the voters of a city, file this statement with the City Clerk or Recorder. This statement has been prepared by James R. McCartney, Secretary of State of West Virginia, pursuant to the provisions of West Virginia Code §3-8-6.

(A)

Full Name of Candidate, Agent, Treasurer or Committee West Virginia State Democratic Executive Committee-  
Robert J. Burke, Treasurer  
 (First) (Middle Initial) (Last)

Candidate for, or Agent, Treasurer or Committee in support of the following candidate or cause Entire Democratic Ticket  
 (Office sought, or candidate or cause supported)  
State of West Virginia  
 (District or Circuit if any)

Party Affiliation (if any) Democratic

Office 2106 Kanawha Blvd., E. Mailing 2106 Kanawha Blvd., E.  
 (Number) (Street) Address (Street Address or Box Number)  
Charleston 25311 Charleston 25311  
 (Town or City) (Zip) (Town or City) (Zip)  
 Residence Telephone Business Telephone 304-342-8121

(B)

The balance of cash and any other sum of money on hand at the beginning of the period covered by this

financial statement is \$ 14,391.99

The balance of cash and any other sum of money on hand at the end of the period covered by this financial

statement is \$ 60,727.73

(C)

I hereby certify that the following is a true, complete, and itemized statement of all monies and other tangible things of value contributed or advanced by anyone, together with the full names of all such persons, firms, associations or committees who have made advances or contributions, provided that any contribution totaling more than fifty dollars (\$50.00) by any one contributor is by money order or by check.

## CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
5/1976	Harry M. Huff	\$ 20.00	10/1976	Emery L. Woodall	\$ 100.00
6/1976	James B. Spicer	10.00			
6/1976	James C. Dillon, Jr.	100.00			
8/1976	Jennings B. Holiday	50.00			
9/1976	Eugene E. Tucker	10.00			
9/1976	James E. Hemann	100.00			
9/1976	Steven D. Farick	100.00			
9/1976	Katherine Honaker	25.00			
10/1976	Anonymous (mail)	3.00			
10/1976	Deborah J. Lee	3.00			

Any additional page needed for other contributions of \$250 or less must include all of the above requested information

TOTAL \$ 521.00

	125.00	Louis J. Adams	
	25.00	Anthony Adams, Jr.	
	25.00	Eva Adams	
	50.00	Gerald B. Adkins	50.00
	50.00	Steve Adkins	125.00
	25.00	Joseph P. Albright	100.00
	125.00	Chester E. Airhart	100.00
	125.00	John H. Alderson	50.00
	125.00	Clyde D. Alford	50.00
	25.00	Mary Alfred	25.00
	75.00	Burl E. Allen	75.00
	250.00	Hack Alsop	75.00

Pages needed for Fund Raising Events must include all of the requested information. See attached pages 2 thru 19

S/T 1,875.00  
TOTAL \$92,513.50

### FUND RAISING EVENT

CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EXCEED \$250  
(Residence, Mailing Address, Business and Occupation must be listed)

NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
-0-	-0-	-0-	\$ -0-
Imogene W. Beckett	112 Winter Drive Ripley, W. Va.	House Wife	275.00
Richard E. Crain	11 Fort Clark Estates Benwood, W. Va.	Printer	475.00
Bernard L. Crawford	1500 Harper Road Beckley, W. Va.	Automobile Salesman	375.00
John C. Cruikshank	Ivydale, W. Va.	Merchant	650.00
Paul S. Flack	4451 Kitridge Rd. Dayton, Ohio	Building Contractor	300.00
Lucian Fry	P.O. Box 187 East Lynn, W. Va.	Banker	975.00
W. Goode Gess	Dunker Hill, W. Va.	Merchant	450.00
R. William Hancock	P.O. Box 927 Morgantown, W. Va.	Heavy Equipment Dealer	375.00

Pages needed for Fund Raising Events must include all of the requested information. See attached one page

S/T 3,875.00  
TOTAL \$ 12,810.00

(E)

That all contributions received during the period covered by this financial statement have been reported above in Section C or Section D or both, and that the total amount of all such contributions



CONTRIBUTOR (Last, M. I., Last)	RESIDENCE AND MAILING ADDRESS	OCCUPATION AND OCCUPATION	AMOUNT
Mr. D. Rockefeller IV	1515 Barberrry Lane Charleston, W. Va.	Businessman	\$ 1,000.00
Robert C. Myers	Merritts Ck. Huntington, W. Va.	Nurseryman	1,600.00
Winfield-Miller Assocs.	1007 Bridge Road Charleston, W. Va.	Public Relations	446.62
Alan L. Susman	P.O. Box 1005 Beckley, W. Va.	Banker and Farmer	500.00
TOTAL			\$ 2,546.62

Additional pages needed for other contributions exceeding \$250 must include all of the above requested information.

(D)

I further certify that the following is a true, complete, and itemized statement of every FUND RAISING EVENT held during the period covered by this financial statement. A FUND RAISING EVENT means any event such as a dinner, reception, testimonial, cocktail party, auction or similar affair through which contributions are solicited or received by such means as purchase of a ticket, payment of an attendance fee or through purchase of goods and services.

#### FUND RAISING EVENTS

Date of Event	August 14, 1976	Date of Event	
Type of Event	Reception-Dinner and Dance	Type of Event	
Address of Place Held	Reynolds Street Charleston, W. Va.	Address of Place Held	
Name of Place Held	Beni Kedem Temple and Charleston Civic Center	Name of Place Held	
Total Expenditures	\$ 35,142.02	Total Expenditures	\$
Net Receipts	\$ 105,323.50	Net Receipts	\$

Date of Event		Date of Event	
Type of Event		Type of Event	
Address of Place Held		Address of Place Held	
Name of Place Held		Name of Place Held	
Total Expenditures	\$	Total Expenditures	\$
Net Receipts	\$	Net Receipts	\$

Any additional pages needed for Fund Raising Events must include all of the above requested information.

NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
David G. Hanlon	Harrisville	Attorney	\$ 325.00
Robert F. Hatfield	Rt. 1, Box 213 Hurricane, W.Va.	Businessman	275.00
Robert E. Holroyd	1438 Main St. Princeton, W.Va..	Attorney	350.00
A. Wayne King	Valley Fork, W.Va. (Clay Co.)	Attorney	350.00
David L. Lambert	185 Bethel Road Centerville, Ohio	Contractor	300.00
Lois L. Lambert	1425 Big Hill Rd. Dayton, Ohio	Housewife	400.00
Marion Co. Democratic Executive Committee	313 Professional Bldg. Fairmont, W. Va.		600.00
Ralph F. Lepore	22 Hamilton Ave. Wheeling, W. Va.	Investigator	500.00
Robert A. Mazzella	P.O. Box 655	Restaurant Owner	275.00
Jack R. Murray	2305 23rd St. Parkersburg, W.Va.	Murray Sheet Metal Co.-Manufacturer	300.00
John Protan (NMI)	Sylvester, W. Va.	County Official	325.00
Ervin S. Queen	Box 810 Logan, West Virginia	Businessman	500.00
Arch H. Riley	Suite 200, Riley Bldg. Wheeling, W. Va.	Attorney	500.00
William Z. Schwadron	Box 432 Charles Town, W.Va.	Manager Race Track	300.00
Mrs. McDonald Smith, Jr.	2419 McKinley Ave. St. Albans, W. Va.	Housewife	625.00
Wylie Stowers (NMI)	Rt. 1, Box 126 West Hamlin, W.Va.	Drilling Contractor	500.00
Bernard O. Tice	Rt. 3 St. Marys, W. Va.	Building Contractor	275.00
United Transportation Union	West Logan, W.Va.		375.00
Berkeley Co. Democ. Executive Committee	Bunker Hill, W. Va.		475.00
Mabel Vandelinde	P.O. Box 47 Hamlin, W. Va.	Housewife	285.00
Jacqueline P. Withrow	310 Spring St. Ripley, W.Va.	Secretary	350.00

750.00



8/14/76

Frederick/Altizer	6.00
C. Harold Amick	50.00
Peter Anania	200.00
Elbert Anderson	25.00
John A. Anderson	100.00
Millie Anderson	25.00
Sam J. Angotti	125.00
Doris T. Armstead	25.00
James S. Arnold	25.00
Nick Arvon	25.00
Francis A. Atkins	75.00
Sallie Atkins	25.00
Jim L. Ayres	125.00
Robert Bailey, Jr.	100.00
Eunice Bailey	137.00
Gloria <sup>3</sup> / <sub>4</sub> Bailey	250.00
Larrie Bailey <sup>2</sup>	75.00
William C. Bailey, Jr.	25.00
Jack A. Baldini	100.00
Dale E. Ball	50.00
John W. Ball, Jr.	31.00
Yvonne J. Ballard	50.00
Icile Barbe	25.00
Ida Lee Barger	25.00
Stonie Barker, Jr.	100.00
David A. Barnette	25.00
Arthur Barthelness	50.00
Sanford J. Barton	125.00
Dominick Basile	100.00
George Baughman	50.00
John W. Bays	150.00
Worth C. Beall	125.00
Joel F. Bedell, III	25.00
Robert <sup>5</sup> / <sub>8</sub> Belcher	125.00

Mrs. Marvin K. Ash	12.00
John D. Amos	125.00
Alva Anderson	25.00
I. Braxton Anderson	50.00
John P. Anderson	125.00
Opal H. Anderson	75.00
Hunter Armentrout	50.00
George E. Arnold	250.00
William J. Artrip	125.00
Brooks Ash	175.00
Jan Atkins	25.00
Robert S. Atlee	25.00
Frank A. Baer, II	125.00
Curil Bailey	50.00
Gene W. Bailey	50.00
<sup>R.</sup> Jewell <sup>1</sup> / <sub>4</sub> Bailey	250.00
Troy S. Bailey	25.00
Betty H. Baker	50.00
Margaret J. Baldwin	50.00
Mrs. James E. Ball	50.00
Smokey Ball	125.00
Katherine Banks	102.00
Clifford E. Bargeloh	25.00
Lawrence W. Barker	250.00
Norma C. Barley	125.00
Mary Ann Barrows	25.00
Paul C. Bartlett	25.00
Robert Basil	25.00
Clement R. Bassett	50.00
Faustine Bauman	125.00
Russell G. Beall	250.00
Coy B. Beckett	50.00
James E. Belcher	50.00
Clyde Bell	25.00

Donor Name		Amount	Donor Name		Amount
B/14/76					
Victor A. Barone		\$100.00	Hunter Bennett		\$ 25.00
Paul L. Bennett		25.00	D. Michael Bequette		25.00
Estil <sup>L.</sup> /Bevins		125.00	Henry C. Bias, Jr.		50.00
Columbia Bickel		75.00	George A. Biggs		50.00
L. Billow		25.00	William P. Bittinger		125.00
Nancy L. Black		56.00	Thomas L. Black		100.00
James R. Blake		75.00	Paul M. Blake, Jr.		25.00
J. E. Bleckley, Jr.		103.00	Everett Bledsoe		250.00
June Bledsoe		175.00	James E. Blevins		20.00
Nellie R. Blevins		25.00	Roy M. Blizzard, Jr.		125.00
Betty S. Blosser		25.00	Catherine Bobersky		12.50
C. Thomas Bobbitt		125.00	William C. Bockway		25.00
Abel Boggs		25.00	Ralph Bohannon		125.00
Amos A. Bolen		100.00	Louis Bonasso		50.00
Landers P. Bonenberger		125.00	Harry L. Boord		50.00
Alex E. Booth		100.00	Aunita <sup>H.</sup> /Booth		125.00
C. Dennis Booth		50.00	Hobart Booth, Jr.		125.00
Dixie L. Booton		50.00	William A. Boram		25.00
Frances <sup>M.</sup> /Bosley		31.00	Hugh H. Bosely		100.00
Mat D. Bouldin		25.00	John M. Bowers		25.00
J. Patrick Bower		50.00	Robert R. Bowers		125.00
Clyde L. Bowling		25.00	Richard H. Bowman		125.00
George J. Boyles		25.00	Wilma Hazel Boyles		25.00
James M. Bradley, Jr.		25.00	Sarah Bragg		50.00
Curtis Brannon		25.00	Harry <sup>H.</sup> /Brawley		50.00
Robert A. Broce		50.00	Harry L. Broh		125.00
Wade H. Bronson		125.00	James R. Brotherton		50.00
Wm. T. Brotherton, Jr.		125.00	Mary Brown		25.00
Ralph N. Brown		75.00	Walter R. Brown		25.00
Pat Browning		12.00	Chauncey H. Browning		125.00
Robert Browning		25.00	Simon M. Bright		125.00
Margaret Bruffey		50.00	Butch <sup>E.</sup> /Bryan		250.00
Don Bryant		25.00	Reedie Bryant		50.00
George Baharah		25.00	Thomas E. Bungardner		125.00
David Dunn		75.00	G. Richard Bunner		25.00

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201. AMOUNTS FOR THE MONTH OF SEPTEMBER, 1976, AND FOR THE YEAR 1976

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
8/14/76	William E. Burchett	\$ 125.00		Rex Burford	\$ 125.00
	Kenneth R. Burdette (Mrs.)	25.00		Margaret Burdette	250.00
	Robert <sup>L.</sup> Burford	250.00		Harold D. Burgess	50.00
	Billy B. Burke	225.00		Robert <sup>J.</sup> Burke	125.00
	George <sup>G.</sup> Burnette, Jr.	125.00		Cary L. Burns	25.00
	Jeanne Burton	50.00		John <sup>W.</sup> Burton	125.00
	Ronzel H. Burton	50.00		Elaine S. Bush	75.00
	Evelyn Buster	62.00		Robert C. Byrd	50.00
	James Cain	50.00		James F. Cain	25.00
	Lily W. Cain	25.00		Charles P. Caldwell	25.00
	Clarence E. Caldwell	25.00		Calhoun Co. Exc. Comm.	200.00
	David C. Callaghan	125.00		Dan S. Campaign	50.00
	Evelyn S. Campbell	25.00		Leonard R. Campbell	75.00
	Newton W. Campbell	25.00		Harry <sup>C.</sup> Camper	100.00
	John <sup>A.</sup> Canfield	125.00		W. Gaston Caperton, III	100.00
	Betty Caplan	50.00		Howard Caplan	25.00
	John S. Caplinger	125.00		David M. Cardwell	25.00
	George E. Carenbauer	50.00		Anita Sue Carman	25.00
	Chapin Carpenter, Jr.	25.00		O. F. Carroll, Jr.	125.00
	Reba Norris Carroll	250.00		Noka J. Carter	125.00
	Anthony Casella	100.00		Patrick Casey	12.00
	Sylvia Castle	50.00		Homer G. Cassady, Jr.	100.00
	Peter Cassella	125.00		John <sup>E.</sup> Casto	25.00
	Max Casto	175.00		Russell W. Casto, III	75.00
	Joseph E. Caudle	25.00		John A. Cavacini, Jr.	125.00
	Gerald L. Chafin	225.00		Edna Channell	75.00
	Samuel W. Channell	100.00		Robert L. Childers	100.00
	Jack V. Christie	100.00		John Chuchiak, Jr.	100.00
	Forrest Clark	250.00		Danny O. Cline	125.00
	Harry J. Cline	50.00		Bernard Codispodi	25.00
	Leonard Codispodi	25.00		Charles C. Coffman	25.00
	Charles C. Coffman	25.00		O. R. Colan	125.00
	Albert E. Cole	25.00		Oncal Combs	150.00
	Edna B. Comer	50.00		Joseph Cometti	50.00
	Joseph Marion Compton	75.00		Frank W. Conrad	100.00





AMERICAN SOCIETY OF CIVIL ENGINEERS - MEMBERSHIP LIST - 1935

DATE OF ENTRY	NAME OF CONTRIBUTOR (Full, M., L., Esq.)	AMOUNT	DATE OF ENTRY	NAME OF CONTRIBUTOR (Full, M., L., Esq.)	AMOUNT
8/14/76	Leonard G. Drain	\$ 75.00		Evelyn M. Dancil	25.00
	Kenneth M. Dunn	125.00		Rudolph P. Duranti, Jr.	25.00
	Frederick Durst	25.00		Betty L. Dye	250.00
	Newman H. Dyer	100.00		Maxine Earl	25.00
	R. D. (Pete) Earle	125.00		Richard Earles	25.00
	Hettie C. Earp	25.00		Jess W. Easley Jr.	25.00
	Horton Eckard	25.00		Margarita M. Eckhart	25.00
	Robert C. Edwards	125.00		Anna J. Ehman	12.00
	Jane K. Eib	50.00		Ray Elkins	50.00
	James W. Ellars	25.00		Maywood C. Ellifritt	125.00
	Dean Elliott	50.00		Lee Ellis	100.00
	Lucille Ellis	25.00		Robert V. Ellis	125.00
	Sam Ellis	25.00		Frank M. Ellison	125.00
	C. Douglas Epperly	50.00		Romeo D. Erdie	150.00
	Joseph Eros, Jr.	125.00		Guy F. Escue	75.00
	James Esteppe	125.00		Swanzy L. Evans	125.00
	Swanzy L. Evans	50.00		Donald Evans	125.00
	Diana Everett	225.00		Facemire Brothers & Co.	250.00
	Douglas Facemire	125.00		Eugene Facemire (Sutton)	250.00
	Eugene Facemire (Chas)	125.00		John Daniel Facemire	125.00
	Albert H. Falvo, Sr.	150.00		Ralph A. Fandree	50.00
	George E. Farley	50.00		Nelson N. Farley	50.00
	John Fedley	25.00		Clyde L. Ferguson	50.00
	C. T. Ferguson	100.00		Sylvia R. Ferguson	50.00
	Clement L. Schalte	125.00		Maxine Fields	25.00
	Blaine Fike	25.00		James W. Finley	125.00
	James W. Finley	125.00		Rebecca I. Finley	25.00
	Gertrude V. Firth	25.00		William T. Flanagan	50.00
	Irene D. Fleck	25.00		Agnes Irene Flowers	25.00
	Carolyn Fluharty	225.00		Bernard Folio	125.00
	Richard E. Ford	125.00		Matt Foreman	250.00
	Robert E. Foster	50.00		Norma Fought	25.00
	Fred L. Fox, II	25.00		H. L. Frankel	25.00
	Hile Franklin	125.00		Mrs. Charles Frazier	42.00
	Charles E. Fox	125.00		Mrs. Charles W. Frazier, Jr.	125.00

# CONTRIBUTORS WHOSE CONTRIBUTIONS EXCEEDED \$500 ON 1955

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
8/14/76	John Frazier	\$ 25.00		Grace Freshour	\$ 25.00
	Robert W. Friend	125.00		Jack Fruith	25.00
	O'Dell Frye	25.00		Albert A. Fullen	125.00
	Thorold S. Funk	125.00		Mrs. Willis H. Gaine	25.00
	Carl E. Gainer	50.00		Mrs. Denzil L. Gainer	125.00
	Genevieve Gainer	25.00		Glen B. Gainer, Jr.	150.00
	Edward Gallagher, Jr.	25.00		Okay B. Gandee	25.00
	Mary Lou Gardner	25.00		Joseph R. Garrett	50.00
	Mrs. L. Earl Garrett	25.00		Robert E. Garrett	50.00
	Phyllis Gatson	6.00		Hercil H. Gartin	125.00
	Lylias H. Gay	125.00		Gary W. Gibson	12.50
	Fredric J. George	50.00		Nick A. George	25.00
	Lawrence Gerlach, Sr.	25.00		T. Agnes/Gessel	31.00
	Louise Gibbs	25.00		Jack H. Gibson	50.00
	M. Scott Gibson	25.00		Nettie L. Gidley	25.00
	Ernest H. Gilbert	125.00		Walter Gilbertson	25.00
	John A. Giles	100.00		Betty Gill	25.00
	Charles Gilliam	175.00		George W. Gilliam	25.00
	Gilmer Co. Dem. Comm.	150.00		Robert J. Gilmore	25.00
	Alexander S. Giltinan	125.00		June Gladwell	250.00
	Robert Glick	50.00		W. R. (Bob) Goe	100.00
	Mary Goff	25.00		Mary S. Goff	50.00
	Robert E. Goff	125.00		Betty Goforth	50.00
	Alex Goldberg	125.00		Vanel Golden	25.00
	Rebecca B. Goldman	125.00		Newman M. Goldston	50.00
	Claude E. Goodwin	125.00		Ellen C. Goodwin	125.00
	Daniel <sup>B</sup> /Gordon	75.00		John E. Gorrell	100.00
	Bernard Gottlieb	125.00		Howard S. Graham	200.00
	Everette H. Graley	25.00		C. Dean Gramlich	125.00
	Carroll Greene	50.00		Claud E. Greene	50.00
	John E. Greene	25.00		Donald W. Gregory	100.00
	Charles E. Gribble	50.00		Keith M. Griffith, Sr.	150.00
	Hazel Anna Grinnett	6.00		Garman W. Grinnett	50.00
	Ralph Grinnett	125.00		Carolyn Grove	25.00
	Howard R. Guest	50.00		Mrs. Bryan Guver	250.00



CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
8/14/76	Jan Douglas Hatcher <sup>s</sup>	12.50		Josephine J. Hachaj <sup>sy</sup>	25.00
	Sammy G. Haddad	25.00		Lawrence J. Haggerty	50.00
	Stephen Haid	100.00		Cullen G. Hall	125.00
	James Hall	25.00		Thelma N. Hall	6.00
	William R. Hall	25.00		Charles Halsey	37.00
	Mariam A. Hamblin	25.00		Pat R. Hamilton	100.00
	Walter D. Hammer	25.00		Barbara <sup>W</sup> Hamon	25.00
	C. Page Hamrick, III	181.00		C. Page Hamrick, Jr.	125.00
	Chuck Hamshere	25.00		Fred L. Hanna	25.00
	Leonard B. Hanger	50.00		Beatrice Harbour	50.00
	James J. Haranzo	125.00		Richard E. Hardison	50.00
	Edwin D. Harley	25.00		John C. Harman	74.00
	Betty Jo Harris	50.00		Corlis W. Harris	125.00
	Odessa Dodd Harris	25.00		R. S. Harris	25.00
	Brenda C. Harrod	125.00		Sam R. Harshbarger	100.00
	George <sup>W</sup> Hartman	50.00		I. Frank Hartman, M.D.	50.00
	Henrietta Hartman	150.00		Beatrice Burns Harvey	125.00
	Robert B. Harvit	100.00		Boyd <sup>W</sup> Hash	125.00
	Boyd A. Hash	125.00		Morris E. Haskins	25.00
	Burma Hatfield	50.00		Evelyn Hatfield	250.00
	Elden <sup>W</sup> Haught	100.00		Bonnie B. Hawkins	50.00
	Thomas J. Hawse	25.00		Allegheny Political Action <sup>Committee</sup>	50.00
	James R. Hayes	25.00		Bernard R. Hays	125.00
	William H. Hazlett	125.00		Ken Hechler	200.00
	Charles A. Heck	100.00		Homer <sup>W</sup> Heck	25.00
	Janet S. Heck	75.00		Pam <sup>W</sup> Heck	25.00
	G. Foster Hedges, Jr.	125.00		Mrs. Robert E. Hedrick	100.00
	Wallace Hefner	25.00		William E. Held	6.00
	R. Page Henley, Jr.	125.00		Margaret Hensley	25.00
	Robert <sup>W</sup> Hensley	50.00		Luella M. Henson	25.00
	Brenda Herold	25.00		Hazel Herald	25.00
	Marguerite G. Hess	50.00		Wendell Hester	25.00
	William D. Highland	50.00		George E. Hill, Jr.	100.00
	George W. Hill, Jr.	25.00		Kenneth Hill	25.00

8/14/76	Lorna Hill	\$	25.00	Michael Hill	\$	125.00
	Mary Susan Hilleary		25.00	Phillip Hinerman		25.00
	Phyllis Jean Hite		50.00	Bruce <sup>R</sup> /Hobbs		125.00
	Jack <sup>R</sup> /Hobbs		50.00	Herbert R. Hobday		5.00
	E. Leslie Hoffman, III		25.00	Walter A. Holden		100.00
	Barbara K. Holmes		125.00	Darrell E. Holmes		25.00
	Steve Holmes		50.00	Morris M. Homan		225.00
	Blanche C. Hoover		125.00	Garnet B. Hoover		10.00
	James B. Hoover		25.00	Charles S. Hornor, Jr.		50.00
	William M. Houchins		125.00	Ralph Houlton		25.00
	Charles B. Howard		50.00	Rose M. Howard		25.00
	John E. Howell		100.00	Robert P. Howell		25.00
	Eugene <sup>R</sup> /Hoyer		250.00	Thom B. Huddleston		125.00
	Robert P. Hudson		75.00	Harry M. Huff		75.00
	Steven M. Huff		125.00	Wanda J. Huff		25.00
	Diana L. Huffman		25.00	Jack D. Huffman		50.00
	Kathleen Huffman		25.00	Odell H. Huffman		50.00
	Mrs. Ronald <sup>S</sup> /Huffman		125.00	Ronald <sup>S</sup> /Huffman		100.00
	Freda <sup>V</sup> /Hunt		25.00	Clara A. Hunt		50.00
	Bill Hurley		25.00	John J. Hutchinson		25.00
	Julia T. Hutchinson		12.00	Paul <sup>R</sup> /Hutchinson		175.00
	Thomas A. Hutto		125.00	Tracey <sup>W</sup> /Hylton		125.00
	P. Scott Icard		25.00	Galena Iddings		75.00
	Charles L. Ihlenfeld		125.00	Gordon <sup>W</sup> /Ikner, Jr.		50.00
	Russell L. Isaacs		125.00	Robert A. Isner		50.00
	Robert <sup>W</sup> /Jackson		25.00	William L. Jacobs		50.00
	A. Athar Jalil		12.50	Bianca M. James		18.00
	Charles H. James II		125.00	Donald H. James		25.00
	Joseph C. Janco		125.00	Howard E. Janney		25.00
	Melvin C. Jarrell		50.00	Jessie Jenkins		50.00
	Redolph D. Jennings		25.00	Fred A. Jesser, III		25.00
	O'Dell Jessup		25.00	Bobbie A. Johnson		50.00
	E. M. (Pete) Johnson		125.00	Evelyn Johnson		100.00
	George W. Johnson		150.00	Nicholas W. Johnson		50.00
	Eady A. Johnson		50.00	Robert F. Johnson		100.00

Continued from Page 1 of 2

DATE	NAME OF CONTRIBUTOR (Print, M. L. Last)	AMOUNT	DATE	NAME OF CONTRIBUTOR (Print, M. L. Last)	AMOUNT
8/14/76	Adelyn Jones	100.00		Charles R. Jones	50.00
	Charles T. Jones	200.00		E. Forest Jones	75.00
	Karen B. Jones	100.00		Reverdy H. Jones, III	25.00
	Robert H. Jones	50.00		Roy H. Jones	25.00
	A. Dana Kahle	75.00		Jane W. Kahle	100.00
	Melvin W. Kahle, Jr.	250.00		Gabriel Kalopit	25.00
	Norris Kantor	125.00		Marianne Kapinos	25.00
	John Z. Karantonis	100.00		James F. Karinshak	25.00
	Charles I. Karnes	50.00		T. D. Kauffelt	25.00
	James N. Keen	50.00		Russell T. Keith, Jr.	125.00
	William L. Keller	50.00		Earl K. Kelley	125.00
	George D. Kemper	74.00		Woodlyn Kendrick	50.00
	Mrs. Lee M. Kenna	125.00		Loretta Faye Kennedy	100.00
	Neil H. Kennedy	25.00		Harold L. Kerns	125.00
	Gary <sup>C.</sup> Keys	25.00		Marie Kidd	50.00
	Raymond N. Kidd	25.00		Vaughn L. Kiger	25.00
	Dixie D. Kilham	250.00		Harry Kilmer	50.00
	Hugh A. Kincaid	100.00		Earl H. Kinder	50.00
	Kendrick King	25.00		O. R. Kinsey	125.00
	Matthew M. Kinsolving	25.00		Brown A. King	50.00
	Charles B. King	125.00		Clinton D. Kirk	25.00
	Mrs. Ray W. Kirkwood	75.00		Elizabeth L. Kisner	50.00
	Ruby Gem Kitchen	25.00		Sue H. Kitching	50.00
	David Kitsmiller	25.00		Roy E. Klaproth	100.00
	Lemoine J. Klug	25.00		Clarence W. Knapp, Jr.	25.00
	Miriam W. Knight	50.00		Eugene A. Knotts	50.00
	Jeff Knotts	25.00		Kenneth G. Koch	50.00
	C. Ray Kohlhepp, Sr.	200.00		Brenda Krauklis	25.00
	John A. Krumholtz, Jr.	50.00		Clovis D. Kuhn	25.00
	Mrs. Ch <sup>R.</sup> R. Lacy	75.00		Gerald R. Lacy	50.00
	Guy Lang	50.00		Virginia Lang	25.00
	Gaylord <sup>G.</sup> Lankau	125.00		Clifford <sup>G.</sup> Lantz	125.00
	George H. Lantz	25.00		Dana Lawson	25.00
	James D. LaRosa	100.00		Harold Largent	25.00
	Nancy Largent	25.00		Frank T. Lawson	50.00

8/14/76		8/14/76	
Diana Layne	6.00	Mrs. Thomas Leach	247.00
Louise N. Legg	50.00	Don Lemley	25.00
William E. Lemon	75.00	Arthur E. Lewis	25.00
C. Cameron Lewis	225.00	Charles C. Lewis, Jr.	125.00
Charles S. Lewis, Jr.	225.00	Lewis Co. Dem. Exec. Co.	100.00
Ralph C. Lewis	50.00	Benjamin Lieberman	100.00
Karl C. Lilly	50.00	Anne D. Little	75.00
John A. Little	25.00	Sadie V. Littleton	31.00
Bernard R. Lively	25.00	Don P. Lively,	25.00
Jack Lloyd	125.00	Charles M. Lobban	125.00
Charles E. Lohr	125.00	Regina A. Lohr	50.00
Harold V. Long	100.00	Louis E. Longanacre	25.00
Frank Looman	25.00	Sandra W. Lopinsky	125.00
Larry E. Losch	25.00	Charles M. Love	125.00
Charles M. Love, III	125.00	Chester Lovett	125.00
Dob Lowery	25.00	Mark Lowery	25.00
Kathryn <sup>L.</sup> /Lucas	25.00	Elizabeth P. Lupardus	100.00
Ben Lusk	100.00	Paul F. Lutz	50.00
Robert E. Lynch, Jr.	100.00	John W. Lyon	100.00
Larry B. Lyon, Jr.	50.00	Ann <sup>C.</sup> /Lytle	25.00
Sam <sup>L.</sup> /MacCerkle	125.00	Vernon Mace	25.00
M. K. Macpherson	25.00	Harold H. Madison	25.00
Robert E. Magnuson	125.00	Eugene L. Mahoney	50.00
John J. Malone	25.00	Melton E. Maloney	25.00
George L. Malott	100.00	A. James Manchin	125.00
Joseph H. Manypenny	125.00	Dora F. Marcum	25.00
Stanley F. Margolis	125.00	Nat S. Marino	25.00
Johnny O. Marko	25.00	Michael James Marlowe	25.00
Mildred Marlowe	25.00	Joe Marozzi	50.00
Clairbel L. Marshall	50.00	Marshall Co. Dem.	45.00
Dan A. Marshall	125.00	Sam Marsico	125.00
Clarence E. Martin, III	25.00	Rose G. Martin	50.00
William R. Martin	50.00	Dorothy Maruish	50.00
		Marvin W. Masters	50.00



AMOUNT DONATED FOR THE CONSTRUCTION OF THE NEW CHURCH

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
8/14/76	John Matthews	25.00		Nick Mason	25.00
	Edmund J. Matko	50.00		Gail Matthew	25.00
	Ronald E. Mastrogiosuppe	25.00		Virgil E. Matthews	50.00
	Ann Maxwell	100.00		William B. Maxwell, III	100.00
	Timothy J. May	25.00		Silvester <sup>C</sup> /Mazzella	100.00
	Paul B. McCallister	25.00		Daniel L. McCarthy	25.00
	Vincent McCauley	50.00		Jewel F. McClanahan	125.00
	Charles E. McClintic	25.00		Ira <sup>G</sup> /McCoy	125.00
	Denver Mathis	25.00		James W. McCloud	50.00
	Jack C. McClung	25.00		Mary E. McComas	50.00
	Ira McCoy	125.00		Joseph W. McCoy	50.00
	Virgil McCoy	50.00		Michael McCracken	25.00
	Thomas <sup>J</sup> /McCulloch	25.00		F. Witches/McCullough	100.00
	Carter McDavid	50.00		Jeffrey O. McGeary	125.00
	Mary Eleanor McGee	50.00		James H. McGee	25.00
	Ruth McGill	65.00		Eleanor McGrady	25.00
	Ruth McGraw	40.00		Charles C. McGuire	25.00
	Elizabeth F. McKinstry	25.00		C. H. McKown (Jackie)	125.00
	Alice McLaughlin	50.00		James Kemp McLaughlin	175.00
	Durward N. McMillion	50.00		Julia McNeer	50.00
	Belva McVey	100.00		Howard R. McWorter	25.00
	H. R. McWorter	100.00		Lucille S. Meadows	51.00
	Charles M. Medford, III	25.00		Ernest W. Mellow	75.00
	Henry E. Melton, Jr.	50.00		Minnie R. Mentzer	75.00
	J. Harper Meredith	25.00		Mrs. Charles Merritt	50.00
	Barbara Meyer	25.00		Martin Metz	50.00
	Charles A. Meyer	100.00		Joe C. Midkiff	50.00
	Pat Miklas	50.00		Alan R. Miller	35.00
	Arnold R. Miller	100.00		Emory R. Miller	50.00
	H. Edward Miller	125.00		James F. Miller	50.00
	Joe E. Miller	125.00		John L. Miller	25.00
	Kenneth R. Miller	100.00		Myra L. Miller	105.00
	Raymond D. Miller	50.00		Robert F. Miller	125.00
	Richard L. Miller	100.00		Thomas B. Miller	125.00
	William C. Miller	125.00		William T. Milleson	50.00
	Barbara Miller	25.00		Carol A. Miller, III	125.00

MEMBERSHIP LIST FOR THE YEAR 1950

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
9/14/76	Hugh N. Mills	\$ 100.00		Okey Mills	\$ 125.00
	Lefton M. Milstead, Jr.	125.00		George H. Mitchell	50.00
	James <sup>M.</sup> /Moler	25.00		Robert H. Mollohan	125.00
	Monon. Co. Dem. Women's Club	25.00		Joseph H. Maneypenny	125.00
	James C. Moon	250.00		Avis <sup>S.</sup> /Moore	225.00
	James H. Morgan, Jr.	125.00		John G. Morgan	25.00
	Keith E. Morgan	50.00		Stanis Morton	50.00
	Marcie L. Moore	25.00		Clarence <sup>E.</sup> /Moran	125.00
	William A. Moreland	50.00		Henry W. Morrow, Jr.	125.00
	Gloria F. Morris	25.00		K. D. Morris	125.00
	Pearle C. Morris	25.00		Walter T. Morris	50.00
	James Harold Morton	25.00		Larry J. Morton	12.50
	Paul Morton	100.00		William E. Morton	200.00
	James <sup>Jr.</sup> /Mosby	50.00		M. Thurmond Moss	125.00
	R. D. Moten	125.00		Thomas O. Mucklow	50.00
	Audrey B. Mudd	25.00		Robert J. Mulroy	100.00
	Nora Murdock	25.00		Anna Mae Murphy	125.00
	Jack R. Murray	75.00		Frank Musci	25.00
	Marion S. Muselli	125.00		Andy Myers	125.00
	Jean E. Myers	50.00		Thomas E. Myles	25.00
	Yolanda L. Napple	100.00		Sarah Lee Neal	131.00
	Carrie M. Neely	25.00		Robert B. Neely	25.00
	George E. Neville	125.00		Irene C. Newsome	125.00
	Mrs. Garland B. Nibert, Sr.	225.00		Carl M. Nicholas	50.00
	Thelma Njaka	25.00		Rick Norris	25.00
	Gerald W. Nottingham	50.00		Jack R. Nuzum	50.00
	Marjorie R. Oakley	125.00		Mary O'Brien	50.00
	William O'Brien	25.00		David O'Neal	200.00
	Alva W. Orndorff	125.00		Arthur <sup>W.</sup> /Ostrin	125.00
	Rebecca L. Ours	250.00		Hazel Owens	124.00
	Kelly L. Castleberry	250.00		Mrs. Lorena Castleberry	250.00



MEMBERSHIP LIST - 1966

NAME	AMOUNT	NAME	AMOUNT
8/14/76 Averil L. Ramsey	\$ 125.00	Brady E. Randolph	\$ 50.00
J. Louis Pais	25.00	Mario J. Palumbo	50.00
Debbie Panashy	25.00	Raymond P. Park	100.00
Frederick L. Parker	150.00	Paul E. Parker, Jr.	50.00
Deborah L. Parks	125.00	Thomas R. Parks	50.00
John W. Parr, Mrs.	25.00	James F. Parsons	25.00
Kenny E. Partlow	25.00	Robert Partlow	50.00
Okey Patten	175.00	Freda N. Paul	125.00
Perry Pauley, Jr.	25.00	John F. Payne	250.00
Linda L. Payton	25.00	Mrs. Eva. Pence	25.00
Beverly Penhale	100.00	Emma Lou Pennington	25.00
Kenneth R. Pennington	50.00	Johnny D. Perdue	25.00
Guy W. Perkins	50.00	Lois C. Perkins	25.00
J. Carter Perkins	50.00	Noah E. Perry	25.00
Robert Person	125.00	Charles G. Peters (Mrs.)	62.50
Rose Phares	25.00	George Phares	50.00
David L. Pethtel	25.00	John P. Philbin	50.00
Philipp K. Petry	25.00	Phillip, Benny	125.00
Avis Phillips	25.00	Deborah F. Phillips	50.00
Mary B. Phillips	25.00	Leo J. Pilewski	100.00
Mary L. Pinchart	25.00	Abraham Pinsky	50.00
Richard S. Pinatella	50.00	Charles M. Polan, Jr.	125.00
Lake Polan, Jr.	125.00	Margaret Polk	25.00
Robert Pollitt	50.00	Joel A. Potts III	25.00
Jo Ann Powell	24.00	Robert W. Powell	125.00
William T. Powell	250.00	Frank Powers	125.00
Francis X. Powers	125.00	Ruth F. Prante	31.00
Edgar C. Pratt	50.00	William Preston	50.00
Ernest R. Price	75.00	Frances B. Price	25.00
John H. Price	125.00	Carl F. Prickett	25.00
Herbert L. Profit	50.00	William Proklevich	50.00
Frank Pugh	25.00	John W. Pyles	225.00
John H. Quinn	125.00	Agnes E. Queenberry	250.00
Peter Rader	100.00	Nick Joe Rahall	125.00
William Rader	125.00	R. H. Rader	25.00

8/14/76	Jennings Randolph	50.00	H. Stanley Rawlings	25.00
	Clemon Ray	25.00	Edith Rayburn	25.00
	Lawrence F. Raymond	50.00	Becky Rebrook	250.00
	William E. Rebrook	250.00	William Rebrook	50.00
	Clarence V. Reed	125.00	Jon A. Reed	50.00
	Robert <sup>14</sup> Reed	250.00	Thurman Reed	50.00
	James P. Reid	50.00	Clyde W. Reinhart	125.00
	Peggy Reitwire	25.00	Charles V. Renner	25.00
	Alfred R. Reppert	25.00	L. G. Rice	50.00
	Don R. Richardson	125.00	Herbert W. Richardson	125.00
	Robert Richmond	100.00	William B. Rife	50.00
	Blanche E. Rigglesman	75.00	Frank Rinchich	50.00
	Robert A. Ringel	25.00	Mary E. Risen	25.00
	James E. Ritchea	50.00	Walter Rollins	100.00
	Dominick <sup>14</sup> /Romino	175.00	Nicholas Roomy, Jr.	150.00
	Helaine Rotgin	6.00	Donald A. Rude	75.00
	Fred <sup>14</sup> Rusmissett	125.00	Phyllis J. Rutledge	137.00
	Jerry A. Roach <sup>14</sup>	100.00	Jacob <sup>14</sup> Robinson	25.00
	Lucinda Robinson	25.00	John D. Rockefeller IV	250.00
	Benny F. Rodrigues	125.00	Robert J. Rogers	200.00
	Jimmy Rogers	250.00	Teddy Rogers	25.00
	Helen B. Rollins	250.00	Jack Roop	25.00
	Herschel Rose	50.00	Charles Rotgin	25.00
	H. F. Ross	50.00	Agnes Roush	25.00
	Harold Rudin	125.00	John R. Rudy	75.00
	Gary A. Sacco	125.00	James E. Sago	50.00
	Robert J. Samol	125.00	Albert L. Sommerville	125.00
	Carman Samples (1985)	50.00	Arnold A. Samuels	25.00
	Robert M. Sanders, Jr.	125.00	Stella <sup>14</sup> Sargent	25.00
	F. Lyle Sattas	125.00	George H. Saulton	50.00
	Roland Savilla	50.00	John A. Saxon	125.00
	Frank Sayre	25.00	Mrs. Woodrow Scarborough	50.00
	Woodrow Scarborough	75.00	Clyde A. Schau	50.00
	Mark H. Schaul	100.00	Bud Schearl	50.00
	H. Lee Schlapfel, Jr.	25.00	Robert H. Schmidt	125.00

DATE	NAME OF CONTRIBUTOR (Print Name, Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (Print Name, Last)	AMOUNT
8/14/76	Dewey H. Shultz	\$ 25.00		Albert Schenke II	\$ 125.00
	John Scott	125.00		James N. Sell	125.00
	Barbara Ann Selman	125.00		Don R. Sensibaugh, Jr.	25.00
	Christine Sergeant	25.00		William D. Sergeant	25.00
	James Shahan	50.00		Thomas R. Sharps	25.00
	William H. Shearer	125.00		Frances Sheets	50.00
	Robert E. Sheets	50.00		Nowlin R. Sheets	125.00
	Richard Shelton	175.00		Jimmie Sheppard	12.50
	Walton S. (Toney) Shephard	75.00		Marion V. Shiflet	200.00
	D. Truman Shrewsbury	25.00		Sterl F. Shinaberry	125.00
	Pam Sue Shuman	25.00		Edgar C. Siegrist	25.00
	Victor Skeen	25.00		Clara Lee Sibold	125.00
	Naaman L. Sidebottom	25.00		Teresa Lynn Siders	50.00
	Bernard R. Simmons	25.00		Eloise B. Simms	31.00
	Fred L. Sims, Jr.	25.00		Philip R. Simpson	25.00
	Homer W. Singleton	25.00		Mike V. Sinicropi	225.00
	Mary C. Sites	25.00		R. E. Sizemore	125.00
	William J. Skidmore	100.00		Slack for Congress Com.	250.00 X
	Dorothy T. Smith	62.50		Edgar L. Smith	125.00
	Geraldine J. Smith	125.00		Glenn Smith	25.00
	Guy Smith	125.00		Homer Smith	125.00
	Hulett C. Smith	225.00		Ike S. Smith	25.00
	James S. Smith	12.50		Joe F. Smith	150.00
	Joe L. Smith	125.00		Katherine Smith	50.00
	Lyle A. Smith	125.00		Paula Y. Smith	18.00
	Roy Smith	25.00		R. Gary Smith	25.00
	Richard Smith	125.00		Roger T. Smith	50.00
	Sherry Smith	25.00		Robert J. Smithingco	25.00
	Mindell Smolowitz	25.00		Tillie Snodgrass	25.00
	M. Alice Snyder	25.00		John McGarry Snyder	25.00
	May Son	125.00		Louis S. Southworth	50.00
	Ben Spangler	125.00		Bessie D. Sparks	100.00
	John Spangler	250.00		Ursula M. Spears	125.00
	O. Connor Spaulding	175.00		Cheryl Spencer	25.00

8/14/70	Miss R. Spensard	\$ 10.00	George I. Spensard	\$ 25.00
	Charles A. Sparlock	75.00	Rosemary Squires	25.00
	<sup>T.</sup> Ted Stacy	125.00	Margaret B. Stafford	50.00
	Harley O. Staggars	100.00	<sup>L.</sup> Larry Stalnaker	25.00
	Wm. A. Stanley	12.50	Douglas Staples	250.00
	Andy Starcher	150.00	Genevieve Starcher	25.00
	Larry V. Starcher	25.00	Wavie M. Starcher	100.00
	Helen V. Stayley	25.00	Linda L. St.Clair	100.00
	Sol N. Steffan	125.00	Francis H. Stender	25.00
	Robert M. Steptoe	50.00	Julius Jay Stern	100.00
	Thomas J. Stevens	25.00	John L. Stewart	125.00
	Jon R. Stewart	5.00	R. B. Stewart, Jr.	25.00
	Garnie Stidham	100.00	Charles W. Stipe	25.00
	George W. Stokes	50.00	Thelma Stone	6.00
	William D. Stone	131.00	William K. Stone	50.00
	O. Vince Stonestreet (Mrs.)	75.00	<sup>M.</sup> Clarence Stover	25.00
	Thelma Stover	25.00	William O. Stover	25.00
	Samuel A. Strickland	75.00	Lucille W. Stuart	25.00
	James V. Stump	25.00	Christina Sturgell	125.00
	Elizabeth Sturm	50.00	Mrs. Albert T. Summers	100.00
	Marjorie H. Summers	50.00	Willard A. Sullivan, Jr.	125.00
	James M. Sutton	50.00	Martin F. Sweeney	25.00
	Kenneth L. Swiger	100.00	Lyle C. Tabb	50.00
	Mrs. Lyle C. Tabb	25.00	Louis R. Tabit	25.00
	Richard K. Talbott	125.00	Douglas H. Tanner	125.00
	A. Dale Taylor	125.00	Douglas G. Taylor	87.00
	Jean B. Taylor	25.00	Dr. Randall A. Taylor	25.00
	<sup>E.</sup> Thurman Taylor	50.00	Stephanie D. Teague	25.00
	Stanley Tenney	25.00	Venona E. Terry	125.00
	Edell H. Thorpe	25.00	Andrew J. Thomas	125.00
	Clinton C. Thomas	50.00	<sup>C.</sup> Harold Thomas	25.00
	J. A. Thomas	25.00	Lewis P. Thomas	125.00
	Marion Pope Thomas	125.00	Patty L. Thomas	50.00
	Earl Thompson	25.00	Loudean L. Thompson	50.00
	Harry L. Thompson	25.00	Roger L. Thompson	125.00

Continued from page 1 of 2

Name		Amount		Name		Amount	
8/14/16	Lucille W. Thornhill	\$	201.00	Thomas Tomblin	\$	100.00	
	Ira J. Tombllyn		25.00	Roger W. Tompkins		125.00	
	Daniel R. Tonkovich		125.00	Charles S. Townsend		25.00	
	Helen T. Treanor		31.00	Curtis <sup>B</sup> Trent		50.00	
	Charlotte Trenton		50.00	Willie A. Triplett		25.00	
	Thomas R. Troitino		250.00	Mary Lou Trump		25.00	
	C. Samuel Trump		25.00	Callie Tsapis		125.00	
	Joseph Tucker		50.00	Jack M. Tully		25.00	
	Elen Turley		25.00	Charles T. Tweel		75.00	
	Janice Umberger		50.00	Forest Underwood		50.00	
	Frank Valentine		50.00	George A. Vandale		125.00	
	Dorothy C. Vandelinde		12.50	Charles Van Horn		100.00	
	Charles Van Metre		25.00	Virginia A. Varnum		25.00	
	Elizabeth Viars		25.00	Earl M. Vickers		50.00	
	Edward L. Vorholt (Mrs.)		75.00	Grace Walker		25.00	
	Richard E. Walker		100.00	Verlin <sup>H</sup> Walker		50.00	
	David E. Wallace		125.00	Lorena Wallace		25.00	
	Mrs. H <sup>i</sup> B. Walsh		250.00	Clarence Wamsley		10.00	
	Kenneth V. Ward		25.00	Lafe <sup>B</sup> Ward		175.00	
	Mrs. Paul <sup>B</sup> Ward		18.00	Paul H. Ward		125.00	
	Ellen <sup>B</sup> Warder		25.00	Phil W. Ware		25.00	
	Lucille Watkins		25.00	Oscar Watkins		25.00	
	J. B. <sup>(A.20)</sup> Watson		50.00	William <sup>F</sup> Watson		150.00	
	John S. Watts		125.00	William C. Weaver		100.00	
	Lyle O. Weagel		25.00	F. Alvin Webb		100.00	
	Haymer P. Webb		25.00	Hays Webb		25.00	
	Henry B. Wehrle, Jr.		125.00	Russell S. Wehrle		250.00	
	John R. Wehmer		25.00	Michael R. Wenger		50.00	
	June Westfall		50.00	Mrs. Maxine Wharton		50.00	
	Vernon C. Whitacre		125.00	Clarence C. White		50.00	
	Clyde White		50.00	John B. White		125.00	
	Mary Lou White		50.00	Hanson White		25.00	
	Samuel R. White		100.00	Sara Louise White		25.00	
	William C. White		25.00	William R. White, Jr.		25.00	
	John H. Whitehead		25.00				



UNITED STATES DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT

DATE	NAME OF DONOR (First, M. I., Last)	AMOUNT	NAME OF DONOR (First, M. I., Last)	AMOUNT
8/14/76	Albert Whitner	\$ 25.00	David Wilberg	\$ 25.00
	Ruth Ann Widmeyer	125.00	Pamela K. Wiggins	25.00
	Barbara Wilburn	25.00	Daniel Wilburn	25.00
	Lorraine Wilcoxon	25.00	Robert E. Wilkinson	100.00
	Gene Hal Williams	50.00	Mary Margaret Williams	25.00
	Ralph D. Williams	50.00	Ray A. Williams	25.00
	Mrs. Helen Williamson	31.00	Willis E. Williamson	50.00
	Martin Willis	50.00	K. Ralph Willman	25.00
	Richard H. Wilson	25.00	Robert E. Wilson	25.00
	Robert Wingett	25.00	Mrs. Andy Winnebrenner	25.00
	Henry D. Winnell	25.00	Thomas A. Winner	125.00
	Socia A. Winter	93.00	Robert Withrow	250.00
	Reba A. Wolf	25.00	Bessie R. Wolfe	25.00
	L. Emery Woodall	125.00	Corbett C. Woodrum	25.00
	Anna Mary Woods	25.00	Lonzo Woods	25.00
	Elizabeth Wooten	125.00	William R. Wooten	25.00
	Bonnie N. Worden	50.00	C. L. (Babe) Workman	50.00
	D. Kyle Workman	125.00	M. A. Workman	50.00
	Thurman Workman	25.00	Elizabeth K. Wysong	25.00
	Forrest B. Wysong, Jr.	50.00	John W. Yago	25.00
	Anthony Yanero	125.00	Phyllis Yarnevic	36.00
	Don Yoak	125.00	Frank R. Yoke, Jr.	25.00
	Chalmer L. Young	25.00	William J. Young	25.00
	Joseph S. Zambito	125.00	George D. Zambias	250.00
	Stanley C. Ziemnick	50.00	United Brotherhood of America	100.00x



STATE OF WEST VIRGINIA, DEPARTMENT OF STATE, DIVISION OF ELECTIONS, and the COMMISSIONERS OF THE DEPARTMENT OF REVENUE, are hereby authorized to receive and accept of any person or organization, any sum of money or other thing of value, for the purpose of defraying the expenses of the election of any person to any office in the State of West Virginia, and to issue and deliver to any person or organization, any receipt or other document, in proof of the receipt of any such sum of money or other thing of value, for the purpose of defraying the expenses of the election of any person to any office in the State of West Virginia.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
5/17/76	Blue Cross Hospital Service	Commerce Square Charleston, W. Va.	\$ 60.42
5/17/76	(Daily paper) Charleston Newspapers	1001 Virginia St. Charleston, W. Va.	8.45
5/17/76	C. & P. Telephone Company	408 Broad St., Charleston, W. Va.	108.37
5/17/76	S. Spender Moore Co. (office supplies)	118 Capitol St. Charleston, W. Va.	6.39
5/20/76	Quick Copy, Inc.	240 Capitol St. Charleston, W. Va.	5.98
5/27/76	U.S. Postmaster-Charleston	Post Office Charleston, W. Va.	100.00
5/29/76	Daniel Boone Hotel (Reception)	Washington & Capitol Sts. Charleston, W. Va.	223.40
6/2/76	John E. Howell (Refreshments for Reception)	3803 Venable Ave., S. E. Charleston, W. Va.	83.77
Any additional pages needed for other expenditures must include all of the above requested information.			S/T 596.87/
See attached seven pages			TOTAL \$ 62,055.38

(G)

I further certify that this statement lists all financial transactions, as reported above in Sections C, D, and E, for the period beginning on the 12th day of May, 19 76, and ending on the 22 day of October, 19 76.

(H)

I further certify that the total expenditure for the nomination, election or defeat of my candidacy (or any person or organization advocating or opposing the nomination, election or defeat of any candidate), or the passage or defeat of any issue, thing or item to be voted upon, in whose behalf an expenditure was made or a contribution was given for the Election is \$ 62,055.38.  
(This total includes all expenditures made as of the date of this statement, including all expenditures previously reported in other statements.)

## OATH OR AFFIRMATION

State of West Virginia

County of Kanawha, ss.

Robert J. Burke, being duly sworn, deposes and says that the foregoing is a true and correct statement, to the best of his knowledge and belief, of all financial transactions occurring within the period covered by this statement.

Robert J. Burke  
Signature of Candidate, Agent, or Treasurer

Subscribed and sworn to before me this 28th day of October, 19 76.

James R. [Signature]  
Notary Public

My Commission expires on the 17th day of January, 19 85.

... the total amount of such expenditures made and liabilities incurred during the period covered by this statement.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
6/2/76	Terrace Park East (Rent)	2106 Kanawha Blvd. E. Charleston, W. Va.	\$ 250.00
6/6/76	Holiday Inn (meeting room)	600 Kanawha Blvd., E. Charleston, W. Va.	36.53
6/12/76	Blue Cross Hospital Ser. Inc. (Insurance)	1600 Commerce Square Charleston, W. Va.	60.42
6/12/76	C & P Telephone Co.	408 Broad St. Charleston, W. Va.	117.76
6/12/76	Gulf Oil Corp.	P.O. Box 51157 Atlanta, Ga.	108.84
6/12/76	Woman's Club of Charleston (dues)	Va. & Elizabeth St. Charleston, W. Va.	15.00
6/12/76	Phillips (restaurant service)	600 Kanawha Blvd. E. Charleston, W. Va.	878.33
6/12/76	Xerox Corp. (machine rental & use)	644 Linn Street Cincinnati, Ohio	178.28
6/12/76	Xerox Corp. (Office equipment)	644 Linn St. Cincinnati	140.60
6/15/76	Quick Copy (Service)	240 Capitol St. Charleston, W. Va.	6.96
6/17/76	U. S. Postmaster, Charleston (postage for machine)	Federal Building Charleston, W. Va.	100.00
6/26/76	<sup>A.</sup> Victor/Barone Legal Service	1598 Virginia St., E. Charleston, W. Va.	500.00
6/26/76	Democratic Conv. Housing Room Deposits)	1625 Mass. Ave., N.W. Washington, D. C.	200.00
6/28/76	<sup>A.</sup> Victor/Barone, Travel Expenses	1598 Virginia St., E. Charleston, W. Va.	57.00
7/2/76	Mountaineer Tour & Travel Travel Expenses	216 Main St. Beckley, W. Va.	152.00
7/2/76	Terrace Park East Rent	2106 Kanawha Blvd., E. Charleston, W. Va.	250.00
7/2/76	U. S. Postmaster, Chas. Postage Machine	Post Office Charleston, W. Va.	200.00
7/9/76	Nat. Bank of Coma. Travelers Cks. of Expenses at Nat. Conv.	Commerce Square Charleston, W. Va.	350.00
7/9/76	Blue Cross Hospital Ser. Insurance	1600 Commerce Sq. Charleston, W. Va.	60.42
7/9/76	Mountain Valley Cent. Ser. Coffee Machine	2900 Fourth Ave. Charleston, W. Va.	30.55
7/23/76	U.S. Postmaster-Charleston (stamps)	Post Office Charleston, W. Va.	156.00
7/24/76	International Shops Gifts	600 Kanawha Blvd. E. Charleston, W. Va.	38.97

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DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
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DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
8/9/76	Jones Printing Co., Inc. Office Supplies	P.O. Box 6038 Charleston, W. Va.	\$ 38.58
8/9/76	Xerox Corp. Office Equipment	644 Linn St. Cincinnati, Ohio	112.66
8/9/76	Pitney Bowes Office Equipment	Walnut & Pacific Sts. Stamford, Conn.	168.92
8/9/76	Fraternal Order of Police Contribution	P.O. Box 222 Charleston, W. Va.	10.00
8/9/76	Charleston Newspaper Agency Daily newspaper	1001 Virginia St. Charleston, W. Va.	8.45
8/9/76	Association of State Dem. Chairman - dues	1625 Mass. Ave. N.W. Washington, D.C.	50.00
8/9/76	Mike Keith maintenance	2106 Kanawha Blvd., E. Charleston, W. Va.	10.00
8/10/76	National Bank of Commerce Fed. Tax Deposit	Commerce Square Charleston, W. Va.	175.00
8/17/76	Victor Barone Legal Services	1598 Virginia St. E. Charleston, W. Va.	500.00
8/20/76	Kanawha Banking & Trust Interest on Note	Capitol Street Charleston, W. Va.	400.00
8/24/76	Rebecca Rebrook, R.N. (Prof. Service-St. Conv.)	#9 Woodsedge Charleston, W. Va.	40.00
8/30/76	Kanawha Valley Restaurant Service - Coffee	2909 Fourth Ave. Charleston, W. Va.	25.75
8/30/76	Piedmont Airlines Travel Expenses	Airport Charleston, W. Va.	78.00
8/31/76	American Express Co. Hotel-Nat. Conv.	P.O. Box 16000 New York, N. Y.	1,186.45
9/1/76	Jewell Bailey Payroll	1923 Hudson St. Charleston, W. Va.	605.82
9/1/76	J. C. Dillon, Jr. Expenses-St. Ch. Mtg.	2106 Kan. Blvd. E. Charleston, W. Va.	100.00
9/1/76	Terrace Park East Rent	2106 Kan. Blvd., E. Charleston, W. Va.	350.00
9/10/76	Quick Copy Service Co. Duplicating Service	240 Capitol St. Charleston, W. Va.	13.65
9/13/76	Victor Barone Legal Services	1598 Virginia St. E. Charleston, W. Va.	500.00
9/13/76	Victor Barone Travel Expenses	1598 Virginia St., E. Charleston, W. Va.	122.44
9/13/76	Barrett W. McGraw, Jr. Contribution	2018 Kanawha Blvd. E. Charleston, W. Va.	1,500.00
9/13/76	Jewell Bailey Contribution	515 Perry Road Palm Beach, W. Va.	1,500.00



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and the total amount of such expenditures made and liabilities incurred during the period covered by this statement.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
9/14/76	Glen B. Gainer, Jr. Contribution	1431 Washington Ave. Parkersburg, W.Va.	\$1,500.00
9/14/76	A. James Manchin Contribution	#1 Stella St. Farmington, W.Va.	- 1,500.00
9/14/76	Sam R. Marshbarger Contribution	Trenol Heights Milton, W. Va.	1,500.00
9/14/76	Thomas B. Miller Contribution	102 Maple Ave. Wheeling, W. Va.	1,500.00
9/21/76	W.Va. Dept. Employment Sec.	State Capitol Charleston, W.Va.	54.99
9/23/76	National Bk. of Commerce Fed. Tax Deposit	Commerce Square Charleston, W. Va.	175.00
9/23/76	Gus R. Douglass Contribution	Griggs Landing, West Virginia	1,500.00
9/23/76	Chauncey H. Browning, Jr. Contribution	709 Canterbury Drive Charleston, W. Va.	1,500.00
9/14/76	Blue Cross Hospital Ser. Insurance	1600 Commerce Square Charleston, W.Va.	60.42
9/24/76	Internal Revenue Service Penalty	3131 Democrat Rd. Memphis, Tenn.	9.22
9/27/76	Jones Printing Co. Office Supplies	P.O. Box 6038 Charleston, W. Va.	92.86
9/27/76	R. L. Polk & Co. Suburban Directory	P.O. Box 26285 Richmond, Virginia	30.90
9/27/76	Roytype Division-Litton Bus. Systems, Inc.- Office Supp.	1031 New Britain Ave. West Hartford, Conn	17.78
9/27/76	Xerox Corp. Office Equipment	644 Linn St. Cincinnati, Ohio	221.32
9/27/76	Gulf Oil Corp. Travel Expenses	P.O. Box 51157 Atlanta, Georgia	85.03
9/23/76	B.J.W. Printers Printing	P.O. Box 1309 Beckley, W. Va.	2,000.00
9/23/76	Jarrett Printing Co. Printing	501 Capitol St. Charleston, W. Va.	303.85
9/23/76	Discount Office Center Office Supplies	901 Virginia St. E. Charleston, W.Va.	463.50
9/23/76	Martin Printing Co. Printing	P.O. Box 524 Clarksburg, W.Va.	66.44
9/23/76	Allen Blueprint & Supply Co. Picture blowups	811 Virginia St. E. Charleston, W.Va.	666.47
9/29/76	U.S. Postmaster-Charleston Postage Machine	Post Office Charleston, W. Va.	200.00

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THE FOLLOWING IS A SUMMARY OF THE EXPENDITURES OF THE BOARD OF DIRECTORS OF THE CHARLESTON WOMEN'S YEAR COMMITTEE FOR THE PERIOD COVERED BY THIS STATEMENT.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
9/30/76	The Fruit Bowl Gift	Summers Street Charleston, W. Va.	15.45
9/30/76	Directory Sales Co. Criss Cross Dir.-Chas.	P.O. Box 1764 Charleston, W.Va.	18.75
9/30/76	J. C. Dillon, Jr. Organization mtg. expenses	2106 Kanawha Blvd. E. Charleston, W.Va.	266.25
10/1/76	Terrace Park East Rent	2106 Kanawha Blvd. E. Charleston, W. Va.	300.00
10/4/76	Jan's Flowers	303 Washington St., W. Charleston, W. Va.	20.00
10/4/76	Blue Cross Hospital Ser. Insurance	1600 Commerce Sq. Charleston, W. Va.	60.42
10/4/76	Patterson, Bell & Crane Insurance	P.O. Box 2551 Charleston, W. Va.	165.00
10/4/76	I.B.M. Machine maint.	P.O. Box 6947 Cleveland, Ohio	47.05
10/4/76	C & P Telephone Co. service & extra lines	408 Broad St. Charleston, W. Va.	498.32
10/4/76	C & P Telephone Co. reg. serv.	408 Broad St. Charleston, W.Va.	213.19
10/4/76	Gulf Oil Corp. Travel	P.O. Box 51157 Atlanta, Ga.	79.52
10/4/76	National Bank of Summers Interest on Note	Hinton, West Virginia	907.40
10/4/76	W.Va. St. Tax Dept. Income Withholding	State Capitol Charleston, W. Va.	12.70
10/4/76	W.Va. State Tax Dept. Income With-holding	State Capitol Charleston, W. Va.	12.70
10/5/76	W.Va. Workmen's Comp. Fund	State Capitol Charleston, W. Va.	11.48
10/5/76	Internal Revenue Ser. Federal With holding	3131 Democrat Rd. Memphis, Tenn.	177.05
10/6/76	Gov's. Conf. on International Women's Year - Registration	266 Oakwood Road Charleston, W. Va.	14.00
10/6/76	United Air Lines Travel to St. Ch. Mtg.	Air port Charleston, W. Va.	102.00
10/11/76	Victor <sup>A</sup> /Barone Legal Services	1598 Virginia St. E. Charleston, W. Va.	500.00
10/15/76	Jewell Bailey Payroll	1923 Hudson St. Charleston, W. Va.	391.64
10/18/76	Woodrums Rental of Organ	602 Virginia St. Charleston, W. Va.	35.00
10/20/76	Kenex Supplies	12200 Alameda Dr. Strongsville, Ohio	84.95



DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
8/4/76	Quick Copy Duplicating	240 Capitol St. Charleston, W. Va.	\$ 9.22
8/10/76	Lawrence Barker Reimbursement-postage	2008 Kanawha Ave. Dunbar, W. Va.	3.96
8/9/76	Ronald Fisher Reimbursement-postage	Post Office Charleston, W. Va.	5.40
8/11/76	Cle'ments Dinner Club Advance for J.J. Dinner	2805 Kanawha Blvd. E. Charleston, W. Va.	7,000.00
8/12/76	Beni Keden Temple Donation	100 Quarrier St. Charleston, W. Va.	100.00
8/14/76	James Beane Professional Service	509C Nancy St. Charleston, W. Va.	150.00
8/14/76	Jules Michaux Professional Service	P.O. Box 4371 Charleston, W. Va.	25.00
8/12/76	W. Alexander, Inc. Professional Service	660 Madison Avenue New York, New York	1,500.00
8/14/76	Warren Covington Professional Service	660 Madison Avenue New York, New York	1,500.00
8/17/76	John <sup>E.</sup> /Howell Refreshments-J.J.	3803 Venable Ave. Charleston, W. Va.	1,612.78
8/24/76	Daniel Boone Hotel Women's meeting-J.J.	P.O. Box 2153 Charleston, W. Va.	2,409.50
9/14/76	Charleston Civic Center J-J expenses	Reynolds St. Charleston, W. Va.	12,858.39
9/14/76	Rose City J-J meals	702 Lee St. Charleston, W. Va.	71.25
9/14/76	The Peanut Shoppe Favors-J.J.	126 Capitol St. Charleston, W. Va.	154.50
9/14/76	Pritt, graphic arts Decorations J.J.	714 Jane St. Charleston, W. Va.	1,339.00
9/14/76	Kanawha Valley Regional Trans- portation Auth. - bus rental	P.O. Box 1188 Charleston, W. Va.	90.00
9/14/76	S. Spencer Moore Co. Supplies	118 Capitol St. Charleston, W. Va.	100.00
9/14/76	Gardner Photographics Professional Services	1552 Quarrier St. Charleston, W. Va.	135.96
9/14/76	International Shops Program gifts	600 Kanawha Blvd. E. Charleston, W. Va.	56.85
9/14/76	Carroll Printing Co. Printing	501 Capitol St. Charleston, W. Va.	2,757.07
10/4/76	Winter Floral Co. Flowers	707 Lee St. Charleston, W. Va.	171.50
10/4/76	Sam's Flowers Flowers	303 W. Washington St. Charleston, W. Va.	22.50

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... was made of ...  
... and ...  
... during the period covered  
by this statement.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
10/4/76	Kanawha Co. Women's Democratic Club-Favors	2106 Kanawha Blvd. E. Charleston, W. Va.	\$ 50.00

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Statement of Receipts and Expenditures for Candidates, Agents, Treasurers or Committees

This statement is required to be filed according to the provisions of West Virginia Code §3-8-5 within 30 days after the date of the Election with the Secretary of State, Charleston, West Virginia, for all offices to be filled or issues to be voted upon by the voters of a political division greater than a county. For all offices to be filled or issues to be voted upon by the voters of a county or district therein, file this statement with the County Clerk. For all offices to be filled or issues to be voted upon by the voters of a city, file this statement with the City Clerk or Recorder. This statement has been prepared by James R. McCartney, Secretary of State of West Virginia, pursuant to the provisions of West Virginia Code §3-8-6.

(A)

Full Name of Candidate, Agent, Treasurer or Committee: West Virginia State Democratic Executive Committee  
Robert J. Burke, Treasurer  
 (First) (Middle Initial) (Last)

Candidate for; or Agent, Treasurer or Committee in support of the following candidate or cause: Entire Democratic Ticket  
 (Office sought, or candidate or cause supported)

State of West Virginia  
 (District or Circuit if any)

Party Affiliation (if any): Democratic

Office: 2106 Kanawha Blvd., E. Mailing Address: 2106 Kanawha Blvd., E.  
 (Number) (Street) (Street Address or Box Number)

Charleston 25311 Charleston 25311  
 (Town or City) (Zip) (Town or City) (Zip)

Residence Telephone: \_\_\_\_\_ Business Telephone: 304-342-2121

(B)

The balance of cash and any other sum of money on hand at the beginning of the period covered by this financial statement is \$ 60,727.73

The balance of cash and any other sum of money on hand at the end of the period covered by this financial statement is \$ 62,989.06

(C)

I hereby certify that the following is a true, complete, and itemized statement of all monies and other tangible things of value contributed or advanced by anyone, together with the full names of all such persons, firms, associations or committees who have made advances or contributions, provided that any contribution totaling more than fifty dollars (\$50.00) by any one contributor is by money order or by check.

CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
11/1976	C. Herbert Traubert	\$ 100.00	11/1976	Mrs. James J. Arcure	\$ 200.00
11/1976	Eugene P. Weitzel	50.00			
11/1976	Blanche E. Riggelman	10.00			
11/1976	Richard E. Evans, Sr.	10.00			
11/1976	Patricia B. Hunter	5.00			
11/1976	Mrs. Harry A. Dague	100.00			
11/1976	John D. Foshell IV	100.00			
11/1976	Helvin G. Armentrout	50.00			
11/1976	Joe N. DeAntonis	250.00			
11/1976	John E. Howell	100.00			

Any additional pages needed for other contributions of \$250 or less must include all of the above requested information.

TOTAL \$ 975.00

DATE	NAME OF CONTRIBUTOR (Print, M. L. Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
11/1976	Anthony J. Yanero	Fairmont, W.Va. P.O. Box 643,	Wholesaler	\$2,000.00
11/1976	Vincent F. D'Annunzio	202 Candlelight Dr. Clarksburg, W.Va.	Beverage Distributor	500.00
11/1976	Vincent F. D'Annunzio for David D'Annunzio	110 Emerson Rd. Clarksburg, W.Va.	Beverage Distributor	500.00
11/1976	Josephine Faix (NMI)	200 Ferry St. Clarksburg, W. Va.	Beverage Distributor	1,000.00
11/1976	United Auto Workers U.A.W. - V - CAP	8000 E. Jefferson Ave. Detroit, Michigan	Union	5,000.00
10/1976	Gus R. Douglass	Grimes Landing, W.Va.	W.Va. Commissioner of Agriculture	1,500.00 *
	* Return of Contribution.			
TOTAL				\$10,500.00

Any additional pages needed for other contributions exceeding \$250 must include all of the above requested information.

(D)

I further certify that the following is a true, complete, and itemized statement of every FUND RAISING EVENT held during the period covered by this financial statement. A FUND RAISING EVENT means any event such as a dinner, reception, testimonial, cocktail party, auction or similar affair through which contributions are solicited or received by such means as purchase of a ticket, payment of an attendance fee or through purchase of goods and services.

#### FUND RAISING EVENTS

Date of Event	August 14, 1976	Date of Event	
Type of Event	J. J. Dinner (Reported on Pre-Election Report)	Type of Event	
Address of Place Held		Address of Place Held	
Name of Place Held	" "	Name of Place Held	
Total Expenditures	\$ " "	Total Expenditures	\$
Net Receipts	\$ 1,509.50 in addition to Net Receipts of \$105,323.50 (Reported on Pre-Election Report)	Net Receipts	\$

Date of Event		Date of Event	
Type of Event		Type of Event	
Address of Place Held		Address of Place Held	
Name of Place Held		Name of Place Held	
Total Expenditures	\$	Total Expenditures	\$
Net Receipts	\$	Net Receipts	\$

Any additional pages needed for Fund Raising Events must include all of the above requested information.



# FUND RAISING EVENT

CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
8/14/76	Cecil L. Hedrick	\$ 100.00	8/14/76	Margaret D. Friedman	\$ 50.00
	Mason Co. Democratic Women's Org.	25.00		Mildred McClung Craig (Mrs.)	25.00
	Elaine Corneal	25.00		George E. Nayville	75.00
	C. Edgar Pratt	50.00		M. P. McHale	25.00
	Leatrice J. Stout	25.00		C. M. Long	50.00
	Virginia D. Stewart	50.00			
	Stanley M. Sears	50.00			
	James C. Cain	25.00			
	John W. Hefner	25.00			
	Paul M. Scott	50.00			
	Wm. H. Johnson	25.00			
	Ralph E. Hayes	50.00			

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL \$ 725.00

# FUND RAISING EVENT

CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EXCEED \$250  
(Residence, Mailing Address, Business and Occupation must be listed)

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
8/14/76	Mason County Dem. Exec. Com.	Rt. 1, Box 98-B Pt. Pleasant, W. Va.		\$ 475.00
	Harry C. Beale	P.O. Box 109 Rupert, West Virginia	Salesman Mobile Homes	309.50

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL \$ 784.50

(E)

I further certify that all contributions received during the period covered by this financial statement have been reported above in Section C or Section D or both, and that the total amount of all such contributions

is \$ 12,541.50

I further certify that the following is a true, complete, and detailed statement showing the date, amount and purpose of each expenditure made or liability incurred, together with the full name, residence and mailing address of each person, firm, association, or committee to whom such expenditure was made or liability incurred, and the total amount of such expenditures made and liabilities incurred during the period covered by this statement.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
10/25/76	Campaign Contribution George G. Griffith	3720 Collins Way Weirton, West Virginia	\$ 200.00
10/25/76	Campaign Contribution Dan Tonkovich	506 Benwood Hill Rd. Benwood, West Virginia	200.00
10/25/76	Campaign Contribution David G. Hanlon	111 S. Court St. Harrisville, West Virginia	200.00
10/25/76	Campaign Contribution R. T. Sizemore, Jr.	P.O. Box 34 Clay, West Virginia	200.00
10/30/76	Payroll Jewell Bailey	1923 Hudson St. Charleston, West Virginia	391.64
11/1/76	Office Supplies Kanawha Valley Rest. Service	2909 Fourth Ave. Charleston, West Virginia	35.28
11/1/76	Terrace Park East - Rent	2106 Kanawha Blvd., E. Charleston, West Virginia	300.00
11/1/76	Election Day Expenses-General Wayne County Democratic Ex.Com.	P.O. Box 187 East Lynn, West Virginia	1,000.00
Any additional pages needed for other expenditures must include all of the above requested information.			Sub Total 2,526.92
See attached pages 2 and 3			TOTAL \$ 10,723.17

(G)

I further certify that this statement lists all financial transactions, as reported above in Sections C, D, and F, for the period beginning on the 23rd day of October, 19 76, and ending on the 23rd day of November, 19 76.

(H)

I further certify that the total expenditure for the nomination, election or defeat of my candidacy (or any person or organization advocating or opposing the nomination, election or defeat of any candidate), or the passage or defeat of any issue, thing or item to be voted upon, in whose behalf an expenditure was made

or a contribution was given for the Election is \$ 72,778.55.  
(This total includes all expenditures made as of the date of this statement, including all expenditures previously reported in other statements.)

#### OATH OR AFFIRMATION

State of West Virginia

County of Kanawha, ss.

Robert J. Burke, being duly sworn, deposes and says that the foregoing is a true and correct statement, to the best of his knowledge and belief, of all financial transactions occurring within the period covered by this statement.

Robert J. Burke, Treasurer  
Signature of Candidate, Agent, or Treasurer

Subscribed and sworn to before me this 23rd day of November, 19 76.

Jewell Bailey  
Notary Public

My Commission expires on the 17th day of January, 19 85.



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THE FOLLOWING STATEMENT IS A TRUE AND CORRECT STATEMENT OF THE EXPENSES INCURRED BY THE CANDIDATE DURING THE PERIOD COVERED BY THIS STATEMENT.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
11/1/76	General Election day expenses Cabell Co. Dem. Exec. Com.	P.O. Box 1965 Huntington, West Virginia	\$ 500.00
11/9/76	Insurance Blue Cross Hospital Ser.	1600 Commerce Sq. Charleston, West Virginia	60.42
11/9/76	Service C & P Telephone Co.	Broad Street Charleston, West Virginia	148.88
11/9/76	Subscription Charleston Newspapers	The Gazette - Virginia St. Charleston, West Virginia	8.45
11/9/76	Travel Expenses Gulf Oil Corporation	P.O. Box 51157 Atlanta, Georgia	42.15
11/9/76	Dues Assoc. of State Dem. Chairmen	1625 Mass. Ave. Washington, D. C.	100.00
11/9/76	Special Service Lines C & P Telephone Co.	P.O. Box 3163 Charleston, West Virginia	938.09
11/9/76	Xerox Machine & Supplies Xerox Corp.	644 Linn St. Cincinnati, Ohio	170.78
11/12/76	Legal Services Victor Barone	1598 Virginia St. E. Charleston, West Virginia	500.00
11/15/76	Jewell Bailey - Payroll	1923 Hudson St. Charleston, West Virginia	391.64
11/15/76	Income Tax Division W. Va. State Tax Dept.	State Capitol Charleston, West Virginia	20.82
11/15/76	Tax Deposit National Bk. of Commerce	Commerce Square Charleston, West Virginia	200.00
11/1/76	Gen. Election Day Expenses Mr. Steve Adkins (NMI) (Dispersed as follows:	P.O. Box 327 Delbarton, West Virginia	600.00
	Mr. Howard Bailey (NMI)	Delbarton, W. Va.	\$50.00)
	Mr. Bernie Maynard (NMI)	Ragland, W. Va.	50.00)
	Mr. Paul Sizemore (NMI)	Delbarton, W. Va.	50.00)
	Mr. Jack Spence (NMI)	Rt. 1, Delbarton, W. Va.	50.00)
	Mr. Wilson Currey (NMI)	Rt. 1, Delbarton, W. Va.	50.00)
	Mr. James H. Varney	Delbarton, West Virginia	50.00)
	Mr. Grover Vance (NMI)	Delbarton, West Virginia	50.00)
	Mr. Woodrow Protter (NMI)	Delbarton, West Virginia	50.00)
	Mr. Jim Hignite (NMI)	Rt. 1, Lenore, W. Va.	50.00)
	Mr. Teddy Hall (NMI)	Rt. 1, Williamson, W. Va.	50.00)
	Mr. Drewey Chafin (NMI)	Rt. 1, Lenore, W. Va.	50.00)
	Mr. Harold Williamson (NMI)	Rt. 1, Williamson, W. Va.	50.00)
11/1/76	Gen. Election Day Expenses Mr. E. Donald Evans (Dispersed as follows:	P.O. Box 2235 Williamson, West Virginia	200.00
	Mr. Columbus Avery	222 Mulberry St. Williamson, W. Va.	50.00)
	Mr. William Accord (NMI)	521 Goodman Ave. Williamson, W. Va.	50.00)
	Mr. A. W. Maynard	P.O. Box 592 Williamson, W. Va.	50.00)
	Mr. York Smith, Jr. (NMI)	605 E. 7th Ave. Williamson, W. Va.	50.00)

Statement of the purpose of expenditure and to whom made during the date, amount and date of such person, firm, association, or community to whom such expenditure was made or liability incurred, and the total amount of such expenditures made and liabilities incurred during the period covered by this statement.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
11/1/76	Gen. Election day expenses. Mr. R. Doyle Van Meter (Dispensed as follows: Mr. George Ward (NMI) Mr. Johnny Hatfield Mr. John W. (Bill) Keese Mr. Bill Webb Alice Ketchum (NMI)	P.O. Box 1348 Williamson, West Virginia Goodman Manor, Williamson, W. Va. Gen. Delivery Williamson, W. Va. 310 Slater St. Williamson, W. Va. Park Way Drive Williamson, W. Va. Gen. Delivery Williamson, W. Va.	300.00 50.00 50.00 50.00 100.00 50.00
11/1/76	Gen. Election Day Expenses Mr. Johnny Mahon (Dispensed as follows: Mr. Herman J. Mahon Mr. Ralph Jack Vance	Rt. 1 Delbarton, W. Va. Myrtle, W. Va. Myrtle, W. Va.	200.00 100.00 100.00
11/1/76	Gen. Election Day Expenses Mr. Joey Kohari (NMI) (Dispensed as follows: Mr. Mose Pinson (NMI) Mr. Ben Sammons (NMI) Mr. Jim Kohari (NMI) Mr. Charles Scott (NMI) Mr. Calvin Johnson (NMI) Jean Chapman (NMI)	General Delivery Chattaroy, W. Va. Chattaroy, W. Va. Chattaroy, W. Va. Chattaroy, W. Va. Chattaroy, W. Va. Chattaroy, W. Va. Chattaroy, W. Va.	300.00 50.00 50.00 50.00 50.00 50.00 50.00
11/1/76	Gen. Election Day Expenses Mr. Wallace Miller (NMI) (Dispensed as follows: Mr. Alex Mannard (NMI) Ms. Susie Preece (NMI) Mr. Roaford Markham (NMI) Mr. John Preece (NMI)	Kermit, W. Va. Kermit, W. Va. Kermit, W. Va. Kermit, W. Va. Kermit, W. Va.	200.00 50.00 50.00 50.00 50.00
11/1/76	Gen. Election Day Expenses Mr. Watson Simpkins (NMI) (Dispenses as follows: Mr. Watson Simpkins (NMI) Mr. Jack Simpkins (NMI)	Route 1, Meador, West Virginia Meador, West Virginia Meador, West Virginia	100.00 50.00 50.00
11/1/76	Gen. Election Day Expenses Mr. Elliott Burke (NMI) (Dispenses as follows: Mr. Joe Justice (NMI) Mr. Elliott Burke (NMI)	Route 3, Delbarton, West Virginia Rt. 1, Delbarton, W. Va. Rt. 1, Delbarton, W. Va.	100.00 50.00 50.00
11/3/76	Political Advertising Canfield, Miller & Assoc.	P.O. Box 1424 Charleston, West Virginia	3,115.00*

\* Out of the above amount, \$2,782.11 was disbursed as per the attached schedule to daily and weekly newspapers.

News Leader

\$ 10.00

10.00

12.00

14.00

16.00

18.00

20.00

22.00

24.00

26.00

28.00

County Courier

30.00

Democrat & Republican

32.00

Leader

34.00

Time

36.00

38.00

40.00

42.00

44.00

46.00

Article

48.00

50.00

52.00

54.00

56.00

58.00

60.00

7-9

Saint Marys Oracle	\$ 13.30
Saint Marys Pleasants County Leader	10.50
1111 Herald	15.50
1111 Union News	11.90
1111 Greenville Tyler County Journal	21.00
1111 Greenville Tyler Star News	21.00
1111 Greene County Reporter	10.50
1111 Times Record	14.00
1111 Greenville Nicholas Chronicle	10.00
1111 Union Graxson Central & Democrat	14.20
1111 Terra Alta Preston County News	14.00
1111 Union Monroe Watchman	5.00
1111 Wayne County News	15.20
1111 Winter Echo	11.00
1111 Winter Republican	11.00
1111 Brookings Brooke News	10.00
1111 Union Record	10.50
1111 Union Democrat	10.00
1111 Independent	10.00
1111 Fulda Springs Star	5.00
1111 Fulton Putnam Democrat	10.00

Total: 317.30

average cost per inch: \$1.58  
average cost per insertion: \$15.79

317.30

AD SCHEDULE FOR WEEKLY NEWSPAPERS  
Ten-inch Insertion Once during week of October 24th  
(X.Va. State Democratic Executive Committee)

Springe Morgan Messenger	\$ 19.00
Republican Delta	19.00
Blue Spirit of Jefferson Advocate	26.00
Circle Press	23.00
Circle Press	12.00
Circle Press	14.00
West Virginia Herald	19.00
West County Journal	11.20
Randolph Enterprise Review	9.00
Review	11.20
Randolph Times	11.20
Democrat	18.00
Examiner	13.00
News	14.00
Colonial Chronicle	12.00
Journal	28.00
Star Sentinel	20.00
Atlantic Justice	11.00
Star	11.20
News	12.00
Journal News	9.20
Star Observer	15.40
Star Echo	7.00
West County Journal	14.00
Examiner Independent	13.00
	100



# Statement of Receipts and Expenditures For Candidates, Agents, Treasurers or Committees

This statement is required to be filed according to the provisions of West Virginia Code §3-8-5 not less than 5 nor more than 10 days before the date of the General Election with the Secretary of State, Charleston, West Virginia, for all offices to be filled or issues to be voted upon by voters of a political division greater than a county; for all offices to be filled or issues to be voted upon by the voters of a county or district therein, file this statement with the County Clerk; For all offices to be filled or issues to be voted upon by the voters of a city, file this statement with the City Clerk or Recorder. This statement has been prepared by A. James Maughan, Secretary of State of West Virginia, pursuant to the provisions of West Virginia Code §3-8-6.

Full Name of Candidate, Agent, Treasurer or Committee	West Virginia <sup>(A)</sup> State Democratic Executive Committee Robert J. Burke, Treasurer <small>(First) (Middle Initial) (Last)</small>		
Candidate for, or Agent, Treasurer or Committee in support of the following candidate or cause	Entire Democratic Ticket <small>(Office sought, or candidate or cause supported)</small> State of West Virginia <small>(District or Circuit if any)</small>		
Party Affiliation (if any)	Democratic		
Office Address	2106 Kanawha Blvd. E. <small>(Number) (Street)</small>	Mailing Address	Same <small>(Street Address or Box Number)</small>
	Charleston 25311 <small>(Town or City) (Zip)</small>		Same <small>(Town or City)</small>
Residence Telephone	None	Business Telephone	304-342-8121

(B)  
The balance of cash and any other sum of money on hand at the beginning of the period covered by this financial statement is \$ 29,043.68  
The balance of cash and any other sum of money on hand at the end of the period covered by this financial statement is \$ 39,483.84

(C)  
I hereby certify that the following is a true, complete, and itemized statement of all monies and other tangible things of value contributed or advanced by anyone, together with the full names of all persons, firms, associations or committees who have made advances or contributions, provided that no contribution totaling more than fifty dollars (\$50.00) by any one contributor is by money order or by check.

## CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
6/1973	C. H. Browning, Jr.	\$ 230.00			\$
6/1973	J. C. Dillon, Jr.	100.00			
7/1973	R. E. Holroyd	67.50			
9/1973	J. E. Blackley	85.00			
9/1973	Thomas Korman	100.00			
9/1973	J. J. Rainey	176.13			

See a paper needed for other contributions of \$250 or less must be filed with the above information

TOTAL \$ 758.63



Any additional pages needed for other contributions exceeding \$250 must include all of the above requested information.

I further certify that the following is a true, complete, and itemized statement of every FUND RAISING EVENT held during the period covered by this financial statement. A FUND RAISING EVENT means any event such as a dinner, reception, testimonial, cocktail party, auction or similar affair through which contributions are solicited or received by such means as purchase of a ticket, payment of an attendance fee or through purchase of goods and services.

Date of Event	8/19/78	Date of Event	
Type of Event	Reception and Dinner	Type of Event	
Address of Place Held	Reynolds Street Charleston, WV	Address of Place Held	
Name of Place Held	Born Naden Temple and Charleston Civic Center	Name of Place Held	
Total Expenditures	\$ 27,110.70	Total Expenditures	\$
Net Receipts	\$ 69,903.00	Net Receipts	\$

Any additional paper needed for Fund Raising Events must include all of the following requested information:

CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EXCEED \$250 OF 1976

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
8/19/76	Anthony Adams, Jr. NMI	\$ 25.00	8/19/76	Donald R. Adams	\$ 25.00
	Monis C. Adkins	50.00		Cline Adkins NMI	25.00
	Mrs. Donald B. Adkins	50.00		John Adkins NMI	25.00
	Johnnie Adkins NMI	25.00		Larry C. Adkins	50.00
	Larry L. Adkins	25.00		Ralph D. Adkins	25.00
	M. William Adler	25.00		Jack C. Adrian	50.00
	M. Jamil Ahmed	100.00		William E. Albers	100.00
	Thomas J. Alford	100.00		Lillian F. Alfred	25.00
	Robert E. Alfred	25.00		June L. Allen	250.00
	Jack Alson NMI	25.00		Dennis Altizer NMI	25.00
	Marjorie H. Altizer	25.00		Amalgamated Transit Un.	200.00
	C. H. Amick	50.00		COPE	
				John A. Anderson	100.00
sub-total					1,425.00
TOTAL					\$55,272.00

Any additional pages needed for Fund Raising Events must include all of the above requested information.

See attached 14 pages

FUND RAISING EVENT

CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EXCEED \$250  
(Residence, Mailing Address, Business and Occupation must be listed)

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
8/19/76	Johnnie Adkins NMI	Hamlin, WV	Transportation Bd. of Ed.	\$ 625.00
	Harold S. Albertson	710 Virginia St. E. Charleston, WV	Attorney	400.00
	Russell G. Beall	2102 Maxwell Ave. Parkersburg, WV	Contractor	275.00
	Robert J. Burke	36 Orchard St. Wheeling, WV	President Warwood Tool Co.	300.00
	W. Gaston Caperton	1014 Kanawha Blvd. E. Charleston, WV	Insurance	500.00
	John J. Cafaro	2445 Belmont Ave. Youngstown, Ohio	Construction	1,000.00
	Robert L. Childers	1551 Ritchie Drive Huntington, WV	Adj. Gen. W. Va.	500.00
	Gail R. Clark	1033 Quarry St. E. Charleston, WV	Fleet. Contractor	350.00
	J. C. Dillon, Jr.	2106 Kanawha Blvd. E. Charleston, WV	Merchant Clerk, St. Senate	500.00
sub-total				4,450.00
TOTAL				\$ 14,625.00

Any additional pages needed for Fund Raising Events must include all of the above requested information.

See attached one page

(E)

I further certify that all contributions received during the period covered by this financial statement have been reported above in Section C or Section D or both, and that the total amount of all such contributions

71,401.03

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
5/16/78	Expenses -- Wash. dinner for Sen. Byrd, Jewell Bailey	2106 Kanawha Blvd. E. Charleston, WV	\$ 44.00
5/16/78	Jewell Bailey, Payroll	1923 Hudson St. Charleston, WV	460.91
5/22/78	Fed. Tax Deposit National Bank of Commerce	Charleston, WV	350.00
5/22/78	W. Va. State Tax Dept. Withholding - Income	State Capitol Charleston, WV	28.36
5/23/78	Kanawha Valley Restaurant Ser. Office coffee and supplies	2909 Fourth Ave. Charleston, WV	46.56
5/17/78	Piedmont Airlines to Washington, DC	Airport Charleston, WV	176.00
5/24/78	Quick Copy News release duplicating	Capitol St. & Lee St. Charleston, WV	5.67
5/31/78	Jewell Bailey, Payroll	1923 Hudson St. Charleston, WV	460.91
Any additional pages needed for other expenditures must include all of the above requested information.			sub-total 1,572.43
See attached 8 pages			TOTAL \$ 60,721.47

(G)

I further certify that this statement lists all financial transactions, as reported above in Sections C, D, and F, for the period beginning on the 10th day of May, 19 78, and ending on the 29th day of October, 19 78.

(H)

I further certify that the total expenditure for the nomination, election or defeat of my candidacy (or any party or organization advocating or opposing the nomination, election or defeat of any candidate), or the passage or defeat of any issue, thing or item to be voted upon, in whose behalf an expenditure was made or a contribution was given for the Election is \$ 60,721.47.  
(This total includes all expenditures made as of the date of this statement, including all expenditures previously reported in other statements.)

### OATH OR AFFIRMATION

State of West Virginia

County of Kanawha, ss.

Robert J. Busko

, being duly sworn, deposes and says that the foregoing is a true and correct statement, to the best of his knowledge and belief, of all financial transactions occurring within the period covered by this statement.

Robert J. Busko  
Signature of Candidate, Agent, or Treasurer

Subscribed and sworn to before me this 2nd day of November, 19 78

Notary Public

Commission expires on the 17th day of January, 19 85

DATE	NAME OF CONTRIBUTOR (Print, full name)	ADDRESS AND CITY, STATE, ZIP	BUSINESS AND OCCUPATION	AMOUNT
8/19/78	Kenneth R. Douglass	18 136th Street Chesapeake, W. Va.	Asst. Police Chief	300.00
	Richard T. Douglass	Pensacola, Fl.	Businessman	300.00
	Swansey Evans nmi	Box 1495 Logan, W. Va.	Supervisor Dept. of Agri.	1,000.00
	Lucian Fry nmi	East Lynn, W. Va.	Banker Wayne, W. Va.	350.00
	R. W. Hancock III	P.O. Box 927 Morgantown, W. Va.	Heavy Equipment Sales	375.00
	F. R. Lavendar, Sr.	20 138th St. Chesapeake, W. Va.	Retired	300.00
	Jack B. Lavendar	20 138th St. Chesapeake, W. Va.	Investigator A.B.C. Comm.	600.00
	Ralph F. LePore	22 Hamilton Ave. Wheeling, W. Va.	Retired	750.00
	J. R. Nalle,	Surface Street East Bank, W. Va.	Retired	300.00
	L. Kim O'Neal	Fayetteville, W. Va.	Businessman	300.00
	Charles M. Polan, Jr.	P.O. Box 637 Huntington, W. Va.	Real Estate	300.00
	John Protan nmi	P.O. Box 82 Sylvester, W. Va.	Sheriff	850.00
	Nick Joe Rahall	1801 Harper Road Beckley, W. Va.	Congressman	300.00
	John D. Rockefeller IV	State Capitol Charleston, W. Va.	Governor of West Virginia	500.00
	Sharon P. Rockefeller	Governor's Mansion Charleston, W. Va.	First Lady of West Virginia	1,000.00
	Hulett C. Smith	Harper Road Beckley, W. Va.	Insurance	400.00
	Alan L. Suman	P.O. Box 1005 Beckley, W. Va.	Banker	400.00
	Mrs. Katharine B. Tierney	625 Mountain View Ave. Bluefield, W. Va.	Housewife	300.00
	Woodrow Trent nmi	Box 298 Iaeger, W. Va.	Mine Operator Long Pole, W. Va.	400.00
	United Mine Workers- Political Action Com.	U.M.W. Bldg. Washington, D. C.	labor	400.00
	W. Va. Com. on Political Action - AFL-CIO	Stanley Bldg. Charleston, West Va.	labor	450.00
	E. F. West	66 Express St. Buchannon, W. Va.	Car salesman	300.00



# CONFIRMATION CARD FOR THE 1978-1979 CONFERENCE

DATE	CONFIRMATION CARD NO.	NAME OF CONFIRMEE	AMOUNT	DATE OF EVENT	NAME OF CONFIRMATOR	AMOUNT
8/19/78		Paul H. Anderson	25.00		Wurist F. Andrick	25.00
		Donald F. Anello	100.00		Albert Anson, Jr., nmi	25.00
		Michael R. Arbogast	25.00		Forrest Armentrout A.	100.00
		Melvin G. Armentrout	25.00		Sue Armentrout nmi	25.00
		G. E. Arnold	100.00		John Arthur nmi	50.00
		Nick Arvon nmi	25.00		James M. Ashley	25.00
		Robert J. Atkins	100.00		Sallie Atkins nmi	55.00
		Louis Averson nmi	50.00		Encil Bailey nmi	50.00
		Everett Bailey nmi	25.00		Everette K. Bailey	25.00
		Faye Bailey nmi	25.00		Cene W. Bailey	25.00
		Gregory W. Bailey	25.00		Lynn Bailey NMH	25.00
		R. Lane Bailey	25.00		Larrie Bailey nmi	50.00
		Larry D. Bailey	25.00		Troy S. Bailey	100.00
		Jack A. Baldine	100.00		Wallace R. Bailey	50.00
		James T. Baldwin	50.00		Arthur K. Banks	100.00
		Icie Barbe nmi	25.00		Clyde A. Bare, Jr.	50.00
		Clifford E. Bargeloh	25.00		Joe Barker nmi	25.00
		Lawrence W. Barker	100.00		Jerry S. Barnes	20.00
		Arthur R. Barthelmess	200.00		B. Randall Barton	50.00
		Eileen Basil nmi	25.00		Robert W. Basil	25.00
		Dominick Basile nmi	50.00		Betty L. Batusic	50.00
		Donna M. Bayes	25.00		Harry C. Beale	50.00
		Worth C. Beall	25.00		Carl G. Beard II	100.00
		James W. Beeghley	25.00		A. J. Belcher	25.00
		B. E. Belcher	50.00		Mrs. Ed P. Belcher	25.00
		J. R. Belcher	25.00		James Belcher nmi	25.00
		Harry Bell, Jr. nmi	25.00		Betty K. Bennett	25.00
		Howar L. Bennett	25.00		Norward Bentley nmi	100.00
		Berkley Co. Dam. Women	10.00		Cheryl A. Bergstrom	100.00
		Pete Berl nmi	25.00		Thornton G. Berry, Jr.	200.00
		Woodrow H. Berry	25.00		Estil L. Bevins	25.00
		Donald K. Bischoff	25.00		Patrick B. Boggs	25.00
		Ieno S. Bouchian	25.00		Charlotte C. Braun	50.00
		B. Boney Bupp, Sr.	12.50		Nancy K. Burnett	25.00
		Evelyn M. Buster	50.00		Henry C. Blas, Jr.	25.00

8/19/78		8/19/78	
James A. Bibbey	25.00	H. F. Bickel	50.00
Henry C. Bias, Jr.	25.00	Susannah B. Bittinger	100.00
James R. Blake	25.00	F. Lee Blackhurst	100.00
George D. Blizzard II	100.00	Jean D. Block	200.00
Raymond O. Blume	25.00	A. Alan Bober	50.00
Charles H. Bockway	25.00	Donald Boggess	50.00
Robert L. Boggs	25.00	C. Dennis Booth	200.00
Dixie L. Booton	100.00	Colen P. Bowen	25.00
Etta M. Bowers	50.00	Richard R. Bowers	25.00
George R. Bowling	25.00	Ray Bragg nmi	25.00
Ray R. Bragg	75.00	James E. Brandon	25.00
Curtis Brannon	100.00	Mary Anne Briggs	25.00
Danny Broom nmi	50.00	Edward A. Broome	50.00
Charles G. Brown	125.00	Chauncey H. Browning	200.00
Margaret J. Bruffey	50.00	James N. Bryan	100.00
Ronald G. Bryant	25.00	Debbie Buchanan nmi	25.00
Polly Buckingham (M. B.)	50.00	Junior Bugg nmi	25.00
David A. Bunn	100.00	W. E. Burchett	100.00
Marjorie H. Burke	200.00	Patricia L. Burns	100.00
Farris H. Burton	25.00	Jeanne A. Burton	25.00
John W. Burton	200.00	Renzel H. Burton	50.00
J. Gordon Butterfield	50.00	Donnie Byrd nmi	50.00
James F. Cain	25.00	Mrs. Charles P. Caldwell	25.00
David C. Callahan	100.00	Basil A. Callen	50.00
Newton W. Campbell	100.00	John A. Canfield	25.00
W. Caston Caperton	100.00	John S. Caplinger	100.00
Corrine Caren nmi	100.00	George E. Carenbauer	100.00
W. W. Carlile	25.00	Ruth C. Carnes	50.00
Grover Carpenter, Sr. nmi	100.00	George Carroll	50.00
Ben Carr nmi	50.00	Thomas H. Carroll	50.00
William F. Carroll	25.00	Mrs. Tom T. Carter	25.00
T. L. Carter	25.00	Tom T. Carter	25.00
Fred/Cason	200.00	Loren R. Castleberry	200.00
Otis D. Casto	25.00	Mrs. Lott G. Casto	25.00
J. D. Catalano	100.00	Earl W. Catlett	25.00



# CONFIRMATION, WHOSE ASSOCIATE CONTRIBUTIONS EQUAL \$500 OR LESS

DATE	NAME OF CONTRIBUTOR (Print, M. L., LAST)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (Print, M. L., LAST)	AMOUNT
8/19/78	Howard H. Clark	50.00	8/19/78	Charles Clonche nmi	100.00
	James T. Clark	50.00		Ray A. Crockett	25.00
	Gerald L. Chafin	100.00		Vincent V. Chaney	150.00
	Tennys W. Cheatwood	25.00		Arthur J. Chestnut	25.00
	Bethel J. Childers	25.00		John Chuchiak, Jr. nmi	75.00
	Michael G. Clagett	25.00		Jo Carol Clark	25.00
	Mrs. R. F. Clark	25.00		R. Forrest Clark	25.00
	Bob Clarke nmi	50.00		Doug Clarke nmi	50.00
	Michael W. Cobb	25.00		Charles C. Coffman	25.00
	O. R. Colan	200.00		Marshall N. Colebank	50.00
	James U. Colombo	100.00		Edna B. Comer	25.00
	Edwin D. Cook	50.00		Stephen L. Cook	100.00
	Phyllis J. Conklin	50.00		Bobby Joe Cooper	50.00
	Ennio J. Corte	75.00		Gloria E. Counts	25.00
	Samuel C. Courtney	50.00		Dennis O. Cottrill	25.00
	Frank L. Cottrill, Jr.	100.00		J. E. Cox	50.00
	Paul L. Crabtree	100.00		Warren E. Craddock	50.00
	William B. Criado	50.00		Kenneth Critchfield nmi	25.00
	Eugene Crutchfield, E	50.00		Piff Cruse nmi	50.00
	W. T. Cruze	50.00		David M. Cutlip	50.00
	Charles H. Dameron	100.00		Carl R. Daniel, Jr.	50.00
	Richard W. Davis	25.00		William M. Davis	100.00
	Gloria V. Davoli	100.00		Hope T. Dawkins	12.50
	Hobart Day nmi	25.00		Miles E. Dean	100.00
	Angelo Deiricci nmi	25.00		Daniel B. Denning	25.00
	M. G. Dearborn	200.00		Brady Debrular nmi	25.00
	Noah Dell'Orso	125.00		Frances Jean Dempsey	25.00
	Mrs. J. Raymond DePaulo	50.00		Vinson T.E. DeVilbiss	25.00
	Bobby Dial nmi	50.00		Robert Digges, jr. nmi	25.00
	Petty L. Divita	100.00		Mary B. Dixon	100.00
	Milton L. Dismoff	25.00		William A. Dodd	50.00
	John F. Dolan	50.00		Ruth M. Dole	25.00
	Mrs. O. E. Donaldson	125.00		James M. Donohoe	25.00
	Curtis Dotson nmi	125.00		D. Boyd Dotson, Jr.	25.00
	Dorinda B. Dotson	25.00		Opal H. Dotson	25.00

8/7/78

CONTINUED LIST OF CONTRIBUTIONS RECEIVED FOR THE YEAR 1978

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
8/19/78	Hallie J. Douglass	200.00	8/19/78	Eli Dragisick	100.00
	Leonard G. Drain	75.00		Kenneth M. Dunn	200.00
	Betty Lee Dye	200.00		Robert S. Earle	25.00
	Richard L. Earles	25.00		Betty J. Easter	25.00
	Ellars, Virginia Mae	25.00		Dimple Ellis NMI	25.00
	Ermal E. Ellis	25.00		Frank M. Ellison	125.00
	Nancy Eplin NMI	50.00		C. O Erickson	100.00
	Charles F. Erickson	50.00		Arnanson Evans NMI	25.00
	Bob Evans NMI	25.00		Clifford Evans NMI	25.00
	Ira Evans NMI	25.00		Leslie L. Evans	25.00
	Facemire Brothers & Co.	125.00		Eugene Facemire NMI	100.00
	James W. Facemire	50.00		Raymon D. Fallen	25.00
	Albert Falvo NMI	175.00		George E. Farley	50.00
	Constance J. Farris	100.00		John E. Faulconer	100.00
	Norman L. Fagan	50.00		S. John Fragale	50.00
	John C. Fealy	25.00		Fred H. Ferguson	25.00
	Bernard Ferrell NMI	50.00		Wirt Ferrell	50.00
	Fields, Tim W.	50.00		Lee Craner Fittro	25.00
	Hugh C. Flaherty	200.00		Terrence R. Flaherty	25.00
	George W. Fleshman	50.00		Robert C. Fleshman	75.00
	E. S. Frame III	25.00		F. F. Flint	25.00
	Barbara Fruth NMI	25.00		Jack Fruth NMI	25.00
	S. John Fragale	50.00		Drexell Frame	50.00
	Billy M. Frame	25.00		Ralph A. Frame, Sr.	50.00
	Robert E. Frame	5.00		Grace Freshour NMI	25.00
	Jack O. Friedman	200.00		Carl E. Gainer	50.00
	Glen B. Gainer	50.00		Glen B. Gainer, Jr.	100.00
	J. K. Callaher	50.00		S. H. Galperin	200.00
	Kenneth Gardner NMI	25.00		Mary Lou Gardner	25.00
	Mrs. Robert E. Garrett	25.00		Kyle Garretson NMI	25.00
	Phillip D. Gaujet	100.00		Frank Caylock Jr. NMI	25.00
	Frederic J. George	50.00		Agnes T. Gessell	25.00
	James J. Gessler	125.00		Ann H. Giampontio	25.00
	Ann H. Giampontio	25.00		Ether Gibson NMI	50.00

1/10/79

CONTINUATION OF THE AGGREGATE CONTRIBUTION EQUAL 1977 OR LESS

DATE OF CONTRIBUTION (First, M., L., Last)	NAME OF CONTRIBUTOR (First, M., L., Last)	AMOUNT	DATE OF CONTRIBUTION (First, M., L., Last)	NAME OF CONTRIBUTOR (First, M., L., Last)	AMOUNT
8/19/78	Eugene Gibson NMI	\$ 25.00	8/19/78	Judy Gibson	\$ 25.00
	Linda L. Gibson	25.00		W. B. Gibson	125.00
	Ernest H. Gilbert	100.00		Walter Gilbertson	25.00
	Elizabeth S. Gill	50.00		Wm. H. Gillespie	100.00
	Leon H. Ginsberg	200.00		Newman M. Goldston	50.00
	Anthony P. Gonzalez	50.00		K. M. Griffith	50.00
	W. R. Goe	125.00		Sondra G. Goodwin	50.00
	Thomas R. Goodwin	200.00		Bernard Gottlieb NMI	100.00
	Richard E. Gottlieb	25.00		John S. Governor, IV	100.00
	Jerome R. Graham	125.00		Ben Greene NMI	200.00
	Gary L. Greeson	25.00		Carolyn Grove	25.00
	Carolee Gum NMI	50.00		Mary Ann Gum	50.00
	George Haddad NMI	50.00		Edward J. Hafer, Jr.	100.00
	Clyde W. Gagedarb	25.00		Lawrence J. Haggerty	50.00
	V. Odell Haines	25.00		D. Hale NMI	25.00
	James J. Haley	50.00		Jack E. Hall	100.00
	Norman S. Halliday	100.00		Ted Halstead	50.00
	Miriam A. Hamblin	25.00		Larry and Judith Hamrick NMI	200.00
	William K. Hamilton	100.00		Cletus B. Hanley	100.00
	Homer W. Hanna, Jr.	200.00		Howard C. Hardesty	50.00
	Herna Hanshaw NMI	25.00		David C. Hardesty, Jr.	100.00
	Richard E. Hardison	25.00		John Harman	25.00
	Corlis W. Harris	200.00		Elizabeth W. Harris	200.00
	Bethel Hartley NMI	25.00		Victor Hartley NMI	25.00
	Henrietta H. Hartnam	200.00		Patricia O. Hartman	50.00
	Eldon J. Haught	100.00		Mrs. Wm. D. Hawley	25.00
	Sharon Gay Hayden	200.00		Wesley F. Hayden	25.00
	James R. Hayes	25.00		Clifford Haynes NMI	50.00
	Alfred K. Hays	25.00		Bernard R. Hays	200.00
	C. B. Holley	25.00		D. Fred Heater	25.00
	Mary Alice Heddlestib	100.00		R. Ray Heddleston	25.00
	Bessie H. Hick NMI	25.00		Helen D. Hickrick	25.00
	Thomas Hickrick NMI	125.00		Virgil Hickrick NMI	50.00
	Mrs. Ronnie Hefner	50.00		Watt W. Helmick	50.00

CONTRIBUTORS SEE AGGREGATE CONTRIBUTION DUAL JES OR LESH

DATE	NAME OF CONTRIBUTOR First, M. I., Last	AMOUNT	DATE OF GIFT	NAME OF CONTRIBUTOR First, M. I., Last	AMOUNT
8/19/78	Anne Hendricks NMI	25.00	8/19/78	James Hendricks NMI	25.00
	Hazel Hendricks NMI	25.00		Thomas M. Hennessy	25.00
	Randall G. Henry	25.00		John Hensley NMI	50.00
	Mrs. Robert W. Hensley	50.00		Sarah A. Hensley	25.00
	Stephen D. Herndon	50.00		Linda L. Hershberger	25.00
	Neil E. Hewitt	25.00		Grace Hickman NMI	25.00
	Paul Hinkle	25.00		Louise B. Hogan	25.00
	Gary Hoke NMI	25.00		Ray Holbert	50.00
	Walter A. Holden	100.00		Alan P. Holmes	200.00
	Robert E. Holroyd	200.00		Morris M. Homan	100.00
	Blanche C. Hoover	25.00		James B. Hoover	25.00
	Margaret C. Horn	25.00		Echaed Horton NMI	25.00
	D. R. Hostietle	50.00		Stanley M. Hostler	200.00
	Mrs. John E. Howell	25.00		John E. Howell	25.00
	Robert P. Howell	25.00		Eugene Hoyer	200.00
	Fred W. Huddleston	25.00		Barbara Huffman NMI	25.00
	J. C. Huffman	100.00		Odell H. Huffman	50.00
	Robert B. Huffman	25.00		Troy Huffman	25.00
	J. Steven Hunter	50.00		John G. Hutchinson	200.00
	Nancy Hypes NMI	25.00		Charles L. Ihlenfeld	200.00
	Cynthia L. Ikner	25.00		Walter R. Imler	100.00
	Russell L. Isaacs	200.00		Diana Isado NMI	50.00
	Patricia S. Ivey	25.00		O. E. Jack	25.00
	Jimmy F. Jackson	100.00		Robert W. Jackson	50.00
	Lloyd G. Jackson	250.00		Barbara J. Jennings	25.00
	Louis J. John	200.00		George Johnson NMI	25.00
	Keith Johnson NMI	25.00		Mack L. Johnson	200.00
	Nucgikas W. Johnson	25.00		Phillip Johnson	25.00
	Rady A. Johnson	50.00		Ruth Johnson NMI	25.00
	William H. Johnson	25.00		Margie S. Johnston	25.00
	Frank E. Joliffe	100.00		H. Alva Jones, Jr.	100.00
	Charles T. Jones	50.00		James E. Jones	25.00
	Robert H. Jones	25.00		Sammy Joseph NMI	50.00



NAME OF CONTRIBUTOR (Print Name Last)	AMOUNT	DATE OF PAID	NAME OF CONTRIBUTOR (Print Name Last)	AMOUNT
8/19/78 Melvin W. Kahle, Jr.	200.00	8/19/78	Gabriel G. Kalafat	25.00
Marianne Kapinos NMI	50.00		J. M. Kass, Jr.	50.00
Jo Ann Keister	50.00		Earl K. Kelley	25.00
George D. Kemper	25.00		Mrs. Geo. D. Kemper	25.00
Richard A. Kennedy	25.00		Dennis O. Kernes	50.00
Katherine A. Ketchum	100.00		Gary C. Keys	50.00
Kent T. Keyser	25.00		Vaughn L. Kiger	50.00
Harry N. Kikner	100.00		Norman L. Kilpatrick	50.00
E. R. Kincaid	25.00		E. Robert Kincaid	25.00
Hugh A Kincaid	100.00		Kyle King NMI	25.00
Ruth Kingery NMI	25.00		Matthew M. Kinsolving	25.00
Karen Kirby NMI	50.00		Richard Kirby	50.00
Elizabeth L. Kisner	50.00		Anna F. Krajc	25.00
Frank C. Krajc	25.00		Karen E. Krajc	25.00
Mrs. Wm. F. Krieg	25.00		Rex L. Kuhl	10.00
Jack Kyle	50.00		Albert J. Lane	50.00
T. L. LaNeve	125.00		Richard D. Ladd	200.00
George E. Lantz	25.00		James D. LaRosa	100.00
Fred Larzo NMI	50.00		L.C.L. Lavender	100.00
Betty Lawrence NMI	25.00		Cora Lawson	25.00
Nicholas Lazaris	50.00		Norlene L. Leach	25.00
H. E. Legg	25.00		Thomas B. Legg	25.00
W. E. Lemon	50.00		Mrs. John M. Lesner	10.00
B. R. Lester	25.00		Charles S. Lewis, Jr.	100.00
E. E. Lewis	50.00		Mrs. Thos. B. Low	25.00
Betty Stone Light	200.00		L. E. Lilly	125.00
Catherine A. Linger	75.00		Samuel A. Linger	25.00
Ann Livesay NMI	50.00		Rosezetta Lloyd NMI	50.00
Charles E. Lohr	200.00		Frank R. Looman	50.00
Tony Lopez	50.00		J. R. Losh	50.00
Albert D. Loandman	100.00		Mrs. C. L. Lowe	25.00
Charles M. Love	100.00		Jane Lovell	25.00
Stephen Lovell	25.00		Chesher Lovett	100.00

Date	Name	Amount	Date	Name	Amount
8/19/78	Madden, John T.	50.00	8/19/78	Maddy, James D.	100.00
	Magnuson, R. E.	100.00		Maloney, Melton H.	25.00
	Mandeville, C.C.	75.00		Mansour's Food Mkt.	50.00
	Manypenny, Mrs.				
	Joseph H.	100.00		Margolis, Newton	50.00
	Marlowe, Michael J.	25.00		Marshall, Dan A.	50.00
	Marshall, Max L.	125.00		Martin, J. B.	100.00
	Martin, Ralph W.	50.00		Maruish, Peter J.	25.00
	Mason, Thomas L.	5.00		Massey, Herbert NMI	50.00
	Mathias, Thomas W.	100.00		Matthews, Virgil E.	75.00
	Maxwell, Wm. B. III	100.00		McBrayer, Ruth NMI	25.00
	McCabe, Brooks F, Jr	25.00		McCallister, Elmer C.	25.00
	McCann, Charles NMI	25.00		McClanahan, J.F.	200.00
	McClanahan, Lois M.	25.00		McClausland, George	25.00
	McClausland, Margie				
	NMI	25.00		McClintic, Charles E.	25.00
	McConnell, J. Knox	50.00		McCoy, Ira NMI	200.00
	McCloud, Verneeda B	75.00		McClung, Jack C.	25.00
	McComas, Mary E.	25.00		McCulloch, Thomas M.	100.00
	McCullough, F.W.	100.00		McDavid, Carter	25.00
	McDonald, Charles B.	12.50		McDonald, Dan NMI	100.00
	McElwee, Charles R.	100.00		McGee, Thomas L.	50.00
	McGraw, Darnell V, Jr.	100.00		McGraw, Ruth F.	100.00
	McIntyre, James B.	25.00		McHanus, Lewis N.	100.00
	McVey, Everett NMI	100.00		McWhorten, H.R.	100.00
	Meadows, Edna NMI	35.00		Meadows, Francis NMI	25.00
	Meadows, Mrs. Lucile S	25.00		Meadows, Mike NMI	25.00
	Mellow, Ernest W.	25.00		Metzgar, James K.	25.00
	Michael, Minnie NMI	25.00		Michael, M. Blane	200.00
	Mick, Larry H.	25.00		Miller, Alan R.	25.00
	Miller, Charles E.	50.00		Miller, Charles Lloyd	100.00
	Miller, Joe E.	200.00		Miller, Raymond D.	25.00
	Miller, Robert F.	200.00		Miller, Sharrell NMI	25.00
	Miller, Thomas B.	50.00		Miller, Walter N.	200.00



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13. PAYMENTS TO THE AGENTS DATE CONTINUATION OF LIST OR LIST

NAME OF CONTRIBUTOR (Last, First, Middle)		AMOUNT	NAME OF CONTRIBUTOR (Last, First, Middle)		AMOUNT
8/17/78	Miller, William C.	\$100.00	8/17/78	Mills, Barbara J.	25.00
	Mills, Hugh H.	100.00		Mills, Lewis G.	25.00
	Milstead, Ann L.	100.00		Mitchell, George H.	50.00
	Mollohan, Paul S.	25.00		Mollohan, Robert H.	100.00
	Moon, James C.	100.00		Mooney, E.G., H.F., Jr.	200.00
	Moore, Avis S.	25.00		Moore, Barbara NMI	25.00
	Moore, Cecil B, Jr.	25.00		Moore, Kathy G.	200.00
	Moreland, William A.	50.00		Morgan, Glen D.	25.00
	Mork, John L.	50.00		Morris, I.L.	100.00
	Morris, James V.	100.00		Morris, Virgil S.	25.00
	Morrow, John W.	25.00		Morton, James H.	100.00
	Morton, James P.	50.00		Morton, Paul NMI	150.00
	Moss, Warren H.	100.00		Moyer, Martha A.	200.00
	Mullenax, John W.	100.00		Mullens, John W.	50.00
	Mullins, Donald NMI	25.00		Mulroy, Robert J.	50.00
	Murad, George R.	100.00		Murphy, Mary R.	25.00
	Myers, Andy NMI	50.00		Myers, Lloyd L.	25.00
	Myers, Ray E.	100.00		Nalle, J. W.	100.00
	Narick, Steven D.	100.00		Naseef, Charles J.Sr.	50.00
	Nasser, Myrna G.	25.00		Neal, Sarah L.	25.00
	Neely, Betty H.	25.00		Nibert, G. B.	25.00
	Nichols, J. Pat	25.00		Nisbet, Wallace NMI	25.00
	Njaka, Thelma D.	25.00		Norris, Ricki L.	25.00
	Nunnery, Mrs. Larry E.	50.00		Nutter, Joseph E.	25.00
	O'Brien, Mary M.	25.00		O'Brien, Mildred E.	25.00
	O'Brien, William L.	50.00		O'Brien, William T.	50.00
	O'Dell, Sherri A.	25.00		Ohio Co. Dem. Exec. Com.	50.00
	O'Neal, Dave NMI	75.00		Orndorff, A. W.	100.00
	Palumbo, Mario J.	100.00		Page, James NMI	25.00
	Parker, Frederick L.	25.00		Parker, Judith H.	50.00
	Parr, John W.	25.00		Parsons, James F.	50.00
	Parsons, Paul NMI	50.00		Paspos, Andy NMI	50.00
	Patterson, Okey L.	200.00		Paul, Freda Noble	200.00
	Pauley, Lloyd E.	25.00		Pauley, Barb L.	25.00

# CONTRIBUTIONS WHERE AGGREGATE CONTRIBUTIONS TOTAL LESS OR MORE

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
8/12/78	Pauley, Marie E.	\$ 25.00	8/17/78	Payne, Eugene	25.00
	Payne, Norma L.	25.00		Pennington, Emma L.	25.00
	Pensabene, D. V.	50.00		Perdue, Robin L.	25.00
	Perkins, J. Carter	50.00		Perry, W. C.	100.00
	Person, Robert L.	100.00		Pete, William L.	25.00
	Peters, Bob NMI	50.00		Peters, Esther NMI	25.00
	Petrolo, Anthony J.	25.00		Pickett, George E.	200.00
	Pitts, Clarence J.	25.00		Prendergast, Thomas M.	50.00
	Prezioso, Parie L.	25.00		Pullen, Mrs. S. L.	100.00
	Reed, Mrs. William D.	25.00		Piercy, Sara B.	25.00
	Polan, William J. H.	200.00		Pollitt, Robert D.	25.00
	Poole, George D., Jr.	25.00		Post, Robert Roy	25.00
	Potts, Ira NMI	25.00		Potts, Jewell NMI	25.00
	Powell, Lawrence NMI	25.00		Powell, Robert W.	200.00
	Powers, Clara NMI	25.00		Powers, Frank NMI	50.00
	Powers, Robert NMI	25.00		Price, B. C.	50.00
	Pridemore, Helen W.	12.50		Prichard, Robert L.	25.00
	Prodan, John M.	50.00		Prudich, Joseph J.	25.00
	Purinton, John B.	25.00		Rafferty, Eith A.	25.00
	Rafferty, Victor J.	25.00		Ragimo, Fernandico B.	25.00
	Rahall, Nick Joe II	200.00		Randolph, James R.	25.00
	Randolph, Jennings NMI	25.00		Rayburn, Dana G.	25.00
	Reed, Jon Anthony	75.00		Reed, Robert NMI	25.00
	Reese, Juanita G.	50.00		Renstrom, Gordon E.	12.50
	Richardson, Sally K.	100.00		Rigglesman, Leldon M.	25.00
	Riggs, David B.	50.00		Rinchart, Mary L.	25.00
	Roberts, Mrs. Belford NMI	200.00		Robertson, Roy A.	50.00
	Rollyson, William R.	25.00		Ronning, Lawrence M.	50.00
	Rortz, Nora E.	50.00		Rose, Herschel NMI	100.00
	Roy, Jesse J.	25.00		Rudman, Sharri L.	25.00
	Russell, Franklin D.	25.00		Russo, James J.	25.00
	Ruth, F. Wiley	100.00		Rutledge, Phyllis J.	100.00
	Sargent, Stella A.	25.00		Sattes, F. Lyle	50.00
	Saulton, Ruth H.	25.00		Saunders, John W.	100.00

# CONTRIBUTORS WHO AGREE DATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
8/19/78	Savilla, Roland	50.00	8/19/78	Scarberry, Shirley L.	25.00
	Schafer, John H.	50.00		Schaub, C. Robert	50.00
	Scheirman, Joe E. III	25.00		Schreiber, Robert J.	25.00
	Schulte, Clemet L.	200.00		Schultz, Mrs. Dewey E.	25.00
	Schweizer, Frances S.	25.00		Scott, Paul J.	25.00
	Segal, George S.	100.00		Sergent, W. D.	25.00
	Serpe, Michael E.	25.00		Sevy, William R.	25.00
	Sharp, Jane F.	25.00		Shaw, Richard G.	100.00
	Shearer, Ruth P.	250.00		Shepard, Frank NMI	25.00
	Sherman, Jerry	25.00		Shingleton, W. E.	100.00
	Simon, Dorothy M.	50.00		Skidmore, Ruby K.	25.00
	Sibold, Clara L.	25.00		Sidebottom, Howard NMI	25.00
	Sidebottom, Mike	25.00		Siegworth, Fred S.	25.00
	Simons, E. R.	25.00		Simpson, Donald J.	25.00
	Sims, Juanita Rexrode	100.00		Skelton, Mrs. Jack R.	50.00
	Slater, Kenneth NMI	50.00		Smaidi, Bill (NMI)	50.00
	Smidi, Bill NMI	50.00		Smith, Billy Joe	25.00
	Smith, Charles S.	100.00		Smith, Charles NMI	25.00
	Smith, Dorothy T.	25.00		Smith, Guy Ross	200.00
	Smith, Homer NMI	25.00		Smith, R. Gary	25.00
	Smith, Howard R.	50.00		Smith, I. N.	150.00
	Smith, Marion E.	25.00		Smithers, C. E.	50.00
	Snead, Billy G.	25.00		Snyder, Carolyn M.	100.00
	Snelson, Thomas P.	25.00		Snyder, John M.	25.00
	Solomon, David L.	50.00		Somerville, Paul R, Jr.	10.00
	Sommers, Peter NMI	25.00		Sommers, Jo Ann	25.00
	Sowards, Chris K.	50.00		Spangler, Ben NMI	100.00
	Sparks, Bessie D.	100.00		Spears, Lawrence E.	100.00
	Spencer, James T.	50.00		Sprouse, James M.	100.00
	Stalnaker, Daril NMI	25.00		Stanley, Spiro C.	50.00
	Stanley, William A.	45.50		Starcher, Rex NMI	25.00
	St. Clair, Gary L.	25.00		Sheets, Philip J.	50.00
	Staggers, Harley O.	50.00		Stalnaker, Larry W.	25.00

# CONTRIBUTORS WHOSE CONTRIBUTIONS EXCEED \$250 OR LESS

DATE	NAME OF CONTRIBUTOR GIVEN NAME, LAST	AMOUNT	DATE	NAME OF CONTRIBUTOR GIVEN NAME, LAST	AMOUNT
8/19/78	Staples, Douglas H.	100.00	8/19/78	Starcher, Andy	50.00
	Starcher, Mavis H.	100.00		Steele, Thomas J.	25.00
	Steptoe, Robert M.	50.00		Stern, Julius Jay	200.00
	Stevens, Thomas J.	100.00		Stine, Paul B.	25.00
	Stokes, George W.	25.00		Stone, Riley V.	25.00
	Stout, Perry G.	25.00		Stowers, Lyle NMI	25.00
	Stowers, Wylie NMI	125.00		Stuart, Lucille W.	25.00
	Sturgell, Christina S.	100.00		Stutler, Timothy J.	50.00
	Sullivan, Willard W. Jr.	100.00		Summers, Albert T.	50.00
	Sunderland, Betty B.	10.00		Sweeney, M. F.	25.00
	Tabb, Lyle C.	25.00		Talbott, R. K.	100.00
	Tanner, Douglas H.	25.00		Tanzey, Gene A.	50.00
	Tarron, Michael B.	25.00		Taylor, Albert Z.	50.00
	Taylor, Hubert T.	50.00		Taylor, L. P.	25.00
	Taylor, Robert R.	25.00		Thaw, William P.	200.00
	Thayer, Ethel W.	25.00		Thomas, Clinton C.	50.00
	Thomas, John J.	50.00		Thomas, Marian Pope	100.00
	Thomas, Layman L.	25.00		Thomas, Lewis P.	75.00
	Thomas, Marvin Doyal	50.00		Thomas, Richard P.	25.00
	Thurman, Frank D.	50.00		Tibbs, Harry G.	100.00
	Tomasky, Michael NMI	125.00		Tomblin, Harold NMI	25.00
	Tompkins, Roger W.	200.00		Toney, W. D.	50.00
	Toothman, Woodrow C.	50.00		Totten, Paul NMI	250.00
	Trail, A. J.	25.00		Triplett, George R.	50.00
	Tucci, Silvio NMI	75.00		Tucker, Larry A.	25.00
	Tuckwiller, Lowell J.	25.00		Turley, J. C. Jr.	200.00
	Twohig, Kevin B.	25.00		United Parcel Service	100.00
	Valentine, Mrs. W. Frank	50.00		Valero, Walter NMI	200.00
	Vandelinde, Mabel NMI	75.00		VanHorn, Robert A.	50.00
	Vantol, Alice C.	100.00		VanMeter, R. Doyle II	100.00
	Varha, B. J.	25.00		Vickers, Earl M.	50.00
	Vinson, Frank M.	25.00		Wagy, Rebecca NMI	25.00
	Walker, Richard NMI	50.00		Walkup, Christopher R.	100.00
	Walker, Mrs. Richard E.	50.00		Wandling, Anne Little	25.00



# CONTRIBUTORS WHOSE NAMES ARE ON DATE CONTRIBUTIONS TOTAL \$100 OR LESS

DATE	NAME OF CONTRIBUTOR (Print Name Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (Print Name Last)	AMOUNT
8/12/78	Ward, Lafe P.	\$ 100.00	8/12/78	Ward, Betty	\$ 25.00
	Watson, William E.	100.00		Watts, Geraldine NMI	25.00
	Waybright, James W.	200.00		Weaver, Jack G.	25.00
	Weaver, Robert J.	50.00		Webb, Barbara H.	25.00
	Webb, Harry NMI	25.00		Webster, Buddy L.	25.00
	Weese, Mary M.	50.00		Wehrle, R. S.	200.00
	Weimer, Elizabeth M.	25.00		Wellam, Howard NMI	25.00
	Wellman, David NMI	25.00		Wellman, Dollie J.	25.00
	Wellman, Lester NMI	25.00		Wenger, R. Michael	100.00
	Westfall, Betty J.	50.00		White, Bill NMI	50.00
	White, Clarence E.	50.00		White, Harry NMI	50.00
	White, John S.	50.00		White, Marie NMI	25.00
	White, Phyllis R.	50.00		White, William C.	50.00
	Whitlock, Ernestine NMI	25.00		Whitten, Kenneth NMI	25.00
	Whittington, Cathie D.	25.00		Whited, Mrs. E. L.	25.00
	Wildt, Mae Ellen	25.00		Williams, Harry D.	50.00
	Williams, Raymond NMI	50.00		Williams, Terry A.	25.00
	Williams, W. E.	50.00		Willman, Mrs. K. R.	25.00
	Wilmer, Hope F.	100.00		Wilson, Brian K.	50.00
	Wilson, Georgia NMI	25.00		Wilson, James NMI	25.00
	Wingett, Robert NMI	25.00		Winnell, Henry D.	25.00
	Winnor, Thomas A.	200.00		Womack, John H.	50.00
	Woodall, Huxel NMI	25.00		Wood, Janet White	25.00
	Wood, Mark NMI	25.00		Woodall, Emery NMI	100.00
	Woodrum, Norma C.	25.00		Woofter, Perry W.	25.00
	Word, J. W. Jr.	100.00		Worden, Donza T.	50.00
	Workman, Junior NMI	25.00		Wood, William W.	50.00
	Woodrum, Corbett C.	25.00		Wright, Joni NMI	25.00
	Wynne, John L.	50.00		Wysong, Karen L.	25.00
	Yago, John W.	25.00		Yahn, Robert A.	100.00
	Yanero, Anthony J.	200.00		Yates, JoAnn M.	25.00
	Yanero, Felix NMI	200.00		Yerrid, Lester J.	75.00
	Yock, Don NMI	75.00		Yock, Mrs. Lveretia NMI	25.00
	Zimmerman, H. G.	200.00			

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CONTRIBUTION LIST FOR THE 1978-1979 FISCAL YEAR

DATE	NAME OF CONTRIBUTOR	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR	AMOUNT
8/19/78	Dean T. Lowry	25.00	8/19/78	Attilio M. Lucci	75.00
	Dominic Luciano	25.00		Dominic Luciano, Jr.	25.00
	W. E. Lamstrum	25.00		Mrs. Frank U. Lytle	100.00



STATE OF WEST VIRGINIA  
 DEPARTMENT OF REVENUE  
 STATEMENT OF EXPENDITURE FOR THE MONTH OF JUNE, 1978

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
6/1/78	Piedmont Airlines to Washington, D.C.	Airport, Charleston, W. Va.	180.00
6/2/78	Terrace Park East Rent	2106 Kanawha Blvd. E. Charleston, W. Va.	300.00
6/3/78	U.S. Postmaster Stamps	Post Office Charleston, W. Va.	100.00
6/3/78	Three Printers Duplicating	1609 Kanawha Blvd. E. Charleston, W. Va.	39.30
6/5/78	J.C. Dillon, Jr. Wash. hotel reimbursement	2106 Kanawha Blvd. E. Charleston, W. Va.	76.79
6/5/78	Cash- Expenses for D.N.C. meeting in Washington	2106 Kanawha Blvd. E. Charleston, W. Va.	160.00
6/5/78	Lodging, Sheraton Park Hotel	Washington, D. C.	347.00
6/14/78	Lance's Office supplies	812 Quarrier St. Charleston, W. Va.	3.09
6/19/78	J.C. Dillon, Jr. travel reimbursement	2106 Kanawha Blvd. E. Charleston, W. Va.	200.00
6/20/78	Three Printers Printing-Del. Selection	P.O. Box 4403 Charleston, W. Va.	7.29
6/20/78	Harper Picture Framing Office pictures	32 1/2 Capitol St. Charleston, W. Va.	154.50
6/20/78	Payroll-Jewell Bailey	1923 Hudson St. Charleston, W. Va.	466.91
6/26/78	Phillips Restaurant State Comm. Meeting lunch	600 Kanawha Blvd. E. Charleston, W. Va.	824.90
6/26/78	Cull Oil Corp. Traveling	Atlanta, Ga.	78.79
6/27/78	Payroll-Jewell Bailey	1923 Hudson St. Charleston, W. Va.	466.91
7/1/78	Terrace Park East Rent	2106 Kanawha Blvd. E. Charleston, W. Va.	300.00
7/12/78	S. Spencer Moores Office Supplies	Capitol Street Charleston, W. Va.	11.87
7/12/78	Petty Cash - Office	2106 Kanawha Blvd. E. Charleston, W. Va.	50.00
7/13/78	W. Va. State Tax Dept. Income Tax	State Capitol Charleston, W. Va.	56.76
7/13/78	National Bank of Commerce Federal Tax Deposit	Charleston, W. Va.	350.00
7/13/78	C & P. Telephone Co. Service	Charleston, W. Va.	10.00
7/13/78	Blue Cross Hospital Service, Insurance	Commerce Square Charleston, W. Va.	120.84
7/13/78	Kanawha Valley Restaurant Ser. Office Expenses	2909 Fourth Ave. Charleston, W. Va.	41.20

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DATE PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name) RESIDENCE AND MAILING ADDRESS AMOUNT

7/15/78	Dept. Employment Security	State Capitol Charleston, W.Va.	21.60
7/15/78	Payroll-Jewell Bailey	1923 Hudson St. Charleston, W.Va.	460.91
7/15/78	U.S. Postmaster, Stamps	Charleston, W. Va.	30.00
7/13/78	W.Va. Workmen's Comp.	State Capitol Charleston, W. Va.	5.04
7/14/78	National Bank of Comm. Fed. Tax. Deposit	Charleston, W.Va.	274.20
7/25/78	Greyhound Lines, Inc. express delivery	Summers Street Charleston, W. Va.	8.50
7/25/78	Quick Copy Duplicating	Capitol St. Charleston, W. Va.	22.70
7/27/78	C & P Telephone Co. Measured Service	Charleston, W. Va.	554.53
7/28/78	C & P Telephone Co. Regular Service	Charleston, W.Va.	416.61
7/28/78	Jan's Flowers	Washington St., E. Charleston, W. Va.	63.85
7/28/78	Jones Printing Company Office Supplies	Pennsylvania Ave. Charleston, W. Va.	59.54
7/28/78	S. Spencer Moore Co. Office Supplies	Capitol St. Charleston, W. Va.	25.32
7/28/78	Xerox, Corp.	12200 Alameda Dr. Strongsville, Ohio	164.65
7/28/78	Gulf Oil Corp. travel	Atlanta, Ga.	66.55
7/28/78	I.B.M. Corp. Service Contract	Cleveland, Ohio	73.65
7/28/78	Pitney Bowes Office machines	Stamford, Ct.	168.92
7/31/78	Jewell Bailey Retirement fund	1923 Hudson St. Charleston, W.Va.	100.00
7/31/78	payroll-Jewell Bailey	1923 Hudson St. Charleston, W. Va.	460.91
8/1/78	Terrace Park East Rent	2106 Kanawha Blvd. E. Charleston, W. Va.	300.00
8/1/78	C & P Telephone Measured service	Charleston, W. Va.	259.95
8/1/78	Blue Cross Hospital Ser. Insurance	Commerce Square Charleston, West Virginia	60.42
8/7/78	U. S. Postmaster Postage machine	Charleston, W. Va.	100.00
8/12/78	Gulf Oil Corp	Atlanta, Ga.	63.42

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DECLARATION OF THE DEBTOR: I, the undersigned, do hereby declare that the foregoing is a true and correct statement of the debts and liabilities of the estate of the debtor, and that the same are not subject to any lien or claim of any person or entity, and that the same are not subject to any lien or claim of any person or entity, and that the same are not subject to any lien or claim of any person or entity.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
8/12/78	C & P Telephone Co. Reg. Service	Charleston, W. Va.	159.18
8/12/78	C & P. Telephone co Measured Service.	Charleston, W. Va.	208.00
8/12/78	Xerox Corp.	Cincinnati, Ohio	159.57
8/12/78	National Bank of Commerce Fed. Tax Deposit	Commerce Square Charleston, W. Va.	400.00
8/12/78	W.Va. State Tax Dept- Income tax withholding	State Capitol Charleston, W. Va.	13.38
8/13/78	Payroll-Jewell Bailey	1923 Hudson St. Charleston, W.Va.	460.91
8/24/78	Kanawha Valley Rest. Office Supplies	Charleston, W.Va.	40.00
8/31/78	Terrace Park East Rent	2106 Kanawha Blvd. E. Charleston, W.Va.	300.00
8/31/78	Payroll-Jewell Bailey	1923 Hudson St. Charleston, W.Va.	460.91
8/31/78	Jewell Bailey Retirement fund	1923 Hudson St. Charleston, W.Va.	100.00
9/1/78	National Bank of Commerce Fed. Tax Deposit	Commerce Square Charleston, W. Va.	400.00
9/1/78	W.Va. State Tax Dept. Income Tax	State Capitol Charleston, W. Va.	23.38
9/1/78	J. C. Dillon, Jr. Expenses - Clarksburg	2106 Kanawha Blvd. E. Charleston, W. Va.	94.65
9/1/78	Charleston Newspapers	Virginia St. Charleston, W. Va.	8.45
9/1/78	Blue Cross Hospital Ser. Insurance	Commerce Square Charleston, W.Va.	60.42
9/1/78	Jan's Flowers	Washington St., W. Charleston, W. Va.	12.88
9/1/78	Jones Printing Co. Office Supplies	Pennsylvania Ave. Charleston, W. Va.	59.54
9/1/78	Jarrett Printing Co. Office Supplies	Capitol St. Charleston, W. Va.	70.92
9/1/78	I.B.M., Corp. Office Supplies	Cleveland, Ohio	12.31
9/1/78	C & P Telephone Co. Reg. service	Charleston, W. Va.	190.78
9/13/78	Payroll-Jewell Bailey	1923 Hudson St. Charleston, W. Va.	460.91
9/13/78	U. S. Postmaster,	Charleston, W. Va.	115.00
9/20/78	Randolph for Sen. C.A. dinner ticket	Faintmont, W. Va. Treasurer	25.00
9/30/78	Payroll-Jewell Bailey	1923 Hudson St. Charleston, W. Va.	460.91

TOTAL

STATE OF WEST VIRGINIA  
AND TO WHOM  
(First Name, M. I., Last Name)

RESIDENCE AND MAILING ADDRESS

DATE	DESCRIPTION	RESIDENCE AND MAILING ADDRESS	AMOUNT	REMARKS
10/1/78	Jewell Bailey Retirement Fund	1923 Hudson St. Charleston, W. Va.	100.00	
10/2/78	Terrace Park East Rent	2106 Kanawha Blvd. E. Charleston, W. Va.	300.00	
10/10/78	Woman's Club of Charleston Rental	Virginia St., E. Charleston, W. Va.	100.00	
10/12/78	Blue Cross Hospital Ser. Insurance	Commerce Square Charleston, W. Va.	60.41	
10/12/78	C. & P Telephone Co. Measured Service	Charleston, W. Va.	259.95	
10/12/78	C & P Telephone Co. Reg. Service	Charleston, W. Va.	170.00	
10/12/78	Gulf Oil Corp. travel	Atlanta, Ga.	64.80	
10/12/78	Fraternal Order of Police - Contribution	Charleston, W. Va.	12.50	
10/12/78	Xerox, Corp. copies	Cincinnati, Ohio	4.22	
10/13/78	Internal Revenue Service Federal Tax	Memphis, Tenn.	174.20	
10/15/78	Payroll-Jewell Bailey	1923 Hudson St. Charleston, W. Va.	460.91	
10/13/78	General Elec. day expenses The Chairman, Clay Co. Democratic Exec. Comm. Mr. Robert Reed	P.O. Box 228 Clay, W. Va.	200.00	153073 CK #
	Doddridge Co. Democratic Executive Comm. Mr. W. E. Williams, Sr. Election expenses	202 Louise Ave. West Union, W. Va.	200.00	1608 ✓ 200.00 - 200.00 # 1714
	General Elec. Expenses Mr. Max Marshall Gen. Election Day Expenses Mr. Richard Mongold	Sand Fork, W. Va.	200.00	1607 ✓ 200.00 - 200.00 # 1666
	Gen. Election Day Expenses Mr. Guy Long Ward, County	Petersburg, W. Va.	200.00	1610 ✓ 200.00 - 200.00 # 1713
	Gen. Election Day Expenses Mr. Fred Parker Floyd Co.	P.O. Box L Moorefield, W. Va.	200.00	1611 ✓ 200.00 - 200.00 # 1667
	Gen. Election Day Expenses Mr. Charles E. Miller, Jr. Morgan County	Rt. 1, Box 40 Greenville, W. Va.	200.00	1612 ✓ 200.00 - 200.00 # 1663
	Gen. Election Day Expenses Mr. Paul Barton Wayne County	RED #1 Berkeley Springs, W. Va.	200.00	1613 ✓ 200.00 - 200.00 1613
	Gen. Election Day Expenses Mr. Bernard Tice Mingo County	P.O. Box 455 Franklin, W. Va.	200.00	1614 ✓ 200.00 - 200.00 1614
	Gen. Election Day Expenses Mr. Guy Fultz Mason County	Rt. 2 St. Marys, W. Va.	200.00	1615 ✓ 200.00 - 200.00 1615
	Gen. Election Day Expenses Mr. Elton Hunter Wetzel County	1510 Hantersville Rd. Marlinton, W. Va.	200.00	1616 ✓ 200.00 - 200.00 1616
		Saltville, W. Va.	200.00	1617 ✓ 200.00 - 200.00 # 1617



NAME AND TO WHOM (Last Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT	
Gen. Election Day Expenses	211 2nd St. Spencer, W. Va.	200.00	1619
Gen. Election Day Expenses	202 Fourth St. Parsons, West Virginia	200.00	1619
Gen. Election Day Expenses	Route 3 Sistersville, W. Va.	200.00	1620
Gen. Election Day Expenses	P.O. Box 669 Buckhannon, W. Va.	200.00	1622
Gen. Election Day Expenses	P.O. Box 158 Elizabeth, W. Va.	200.00	1623
Gen. Election Day Expenses	Bigbend, West Virginia	200.00	1624
Gen. Election Day Expenses	P.O. Box 222 Philippi, W. Va.	300.00	1625
Gen. Election Day Expenses	Bunker Hill, W. Va.	300.00	1626
Gen. Election Day Expenses	Sylvester, West Va.	300.00	1627
Gen. Election Day Expenses	290 N. Braxton St. Sutton, W. Va.	300.00	1628
Gen. Election Day Expenses	R 528 Banfield Ave. Follansbee, W. Va.	300.00	1629
Gen. Election Day Expenses	White Sulphur Springs, W. Va.	300.00	1630
Gen. Election Day Expenses	P.O. Box 5 High View, W. Va.	300.00	1631
Gen. Election Day Expenses	100 Powers Road Weirton, W. Va.	300.00	1632
Gen. Election Day Expenses	500 Church St. Ripley, W. Va.	300.00	1633
Gen. Election Day Expenses	Route 3, Box 265 Kearneysville, W. Va.	300.00	1634
Gen. Election Day Expenses	Rt. 4, Box 36-10 Weston, West Virginia	300.00	1635
Gen. Election Day Expenses	Rt. 2 Hamlin, West Virginia	300.00	1636
Gen. Election Day Expenses	P.O. Box 617 Moundsville, West Virginia	300.00	1637
Gen. Election Day Expenses	2212 Jackson Avenue Pt. Pleasant, W. Va.	300.00	1638
Gen. Election Day Expenses	80 Maple Avenue Keyser, West Virginia	300.00	1639
Gen. Election Day Expenses	Craigsville, W. Va.	300.00	1640
Gen. Election Day Expenses	Spring Street Fowlersburg, W. Va.	300.00	1641

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of the total amount of such expenditures made and liabilities incurred during the period covered

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
10/13/78	Gen. Election Day Expenses Mr. Bill Snyder Putnam County	222 Beechwood Estates Scott Depot, W. Va.	1642 300.00 - 700.00 CL # 1707
	Gen. Election Day Expenses Mr. Wimpy Valentine Randolph County	Robert Lee Avenue Elkins, West Virginia	1643 300.00 - 500.00 + 1684
	Gen. Election Day Expenses Mr. Gary Deeds Summers County	P.O. Box 106 Jumping Branch, W. Va.	1644 300.00 - 500.00 + 1685
	Gen. Election Day Expenses Mr. C. R. Kinsey Taylor County	Route -3, Box 410 Grafton, W. Va.	1645 300.00 - 500.00 + 1686
	Gen. Election Day Expenses Mr. Lucian Fry Wayne County	P.O. Box 2007 Wayne, West Va.	1646 300.00 - 700.00 + 1703
	Gen. Election Day Expenses Mr. Eugene Goff Webster County	P.O. Box 278 Cowen, W. Va.	1647 300.00 - 700.00 + 1709
	Gen. Election Day Expenses Mr. Gene Wayne Weizel County	P.O. Box 12 Hastings, W. Va.	1648 300.00 - 200.00 + 1711
	Gen. Election Day Expenses Mr. Bill Bailey Wyoming County	Pineville, W. Va.	1649 300.00 - 700.00 + 1710
	Gen. Election Day Expenses Mr. Robert Nelson Cabell County	P.O. 1965 Huntington, W. Va.	1650 500.00 - 500.00 + 1687
	Gen. Election Day Expenses Mr. Ray A. Goforth Fayette County	P.O. Box 218 Charlton Heights, W. Va.	1651 500.00 - 500.00 + 1688
	Gen. Election Day Expenses Mr. Jim Shaffer Harrison County	230 Maple Ave. Clarksburg, W. Va.	1652 500.00 - 500.00 + 1689
	Gen. Election Day Expenses Mr. William Brotherton Kanawha County	State Capitol Charleston, W. Va.	1653 1,000.00 * (1,100.00)
	Gen. Election Day Expenses Mr. Dominick Romino Marion County	313 Professional Bldg. Fairmont, W. Va.	1654 500.00 - 500.00 + 1690
	Gen. Election Day Expenses Mr. Paige Wooldridge Meigs County	800 Princeton Ave. Bluefield, W. Va.	1655 500.00 - 500.00 + 1691
	Gen. Election Day Expenses Mr. John Hoff Morganalia County	Assessor's Office Morgantown, West Virginia	1656 500.00 - 500.00 + 1692
	Gen. Election Day Expenses Mr. Melvin Kahle, Jr. Ohio County	28 Maple Ave. Wheeling, W. Va.	1662 500.00 - 500.00 + 1693
	Gen. Election Day Expenses Mr. Cameron Lewis Raleigh County	P.O. Box 21 Daniels, W. Va.	1657 500.00 - 500.00 + 1693
	Gen. Election Day Expenses Mr. Jack Murray Wood County	2305 23rd St. Parkersburg, W. Va.	1658 500.00 - 500.00 + 1694
	Gen. Election Day Expenses Mr. S. L. Evans Logan County	P.O. Box 1495 Logan, W. Va.	1659 500.00 - 500.00 + 1695
	Gen. Election Day Expenses Mr. Albert Falvo McDowell County	Roderfield, W. Va.	1660 500.00 - 500.00 + 1696
	Gen. Election Day Expenses Mr. Johnny Owens Mingo County	England, W. Va.	1661 500.00
10/17/78	Kim. Valley Restaurant Service.	Charleston, W. Va.	40.00
10/23/8	J.C. Dillon, Jr.-expenses reimbursement for Sept. & Oct.	2106 Kanawha Blvd. Charleston, W. Va.	126.62

the amount reported to be deposited in a revolving account



DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
7/15/78	U.S. Postmaster, Postage	Charleston, W. Va.	\$ 500.00
8/11/78	Catering-J.J. Dinner Cle'ments (advance)	Charleston, W.Va.	5,000.00
8/16/78	Charleston Newspapers Advertising	Charleston, W.Va.	254.36
8/17/78	Civic Center-Auditorium deposit on building	Charleston, W.Va.	700.00
8/25/78	Boni Kodes Temple Rental on Building	Charleston, W. Va.	225.05
8/25/78	Cle'ments Catering-J.J. Dinner	Charleston, W. Va.	6,402.10
8/19/78	Lucky Jazz Band Music for Dinner	Huntington, W.Va.	480.00
8/25/78	Laury's - Catering J.J. Reception	14 1/2 Capitol St. Charleston, W. Va.	3,142.50
8/25/78	Pritt Graphic Arts decorating-J.J. Dinner	714 Jane St. Charleston, W. Va.	1,339.00
9/7/78	Dept. Finance & Administration State of W.Va. - Rental on airplane	State Capitol Charleston, W.Va.	630.00
9/7/78	Patterson, Bell & Crane Co. Insurance	1110 One Valley Square Charleston, W. Va.	25.00
9/7/78	Nick Wiepper Signs	1016 Grant Street Charleston, W.Va.	60.00
9/7/78	Lance's - decorations supplies	Quarrier St. Charleston, W. Va.	3.71
9/7/78	Barco Display supplies	2098 Oakridge Dr. Charleston, W.Va.	44.40
9/7/78	Modern Restaurant & Store Equipment Co. Candles	1305 Wash. St. E. Charleston, W. Va.	30.00
9/7/78	Franklin D. Roosevelt Library pictures	Hyde Park, N.Y.	3.25
9/7/78	Gen. Services Adm. pictures	819 Taylor St. Fort Worth, Tx.	9.30
9/7/78	Royal Oak - Printing	112 Main St. Oak Hill, W. Va.	589.71
9/7/78	Jarrett Printing Co.	501 Capitol St. Charleston, W. Va.	2,540.91
9/7/78	Gardner Photographics Pictures	1552 Quarrier St. Charleston, W.Va.	128.75
8/15/78	Piedmont Airlines Mondale's Advance man exp.	Airport Charleston, W. Va.	60.00
8/4/78	Three Printers duplicating	Charleston, W. Va.	29.02
8/10/78	Quick Copy on blanking	Charleston, W. Va.	7.01

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... and the total amount of such expenditures made and included incurred during the period covered by this statement.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
7/19/78	Quick Copy, duplicating	Charleston, W. Va.	\$ 12.31
9/20/78	reimbursement-advance cash expenses Mrs. Sharon Rockefeller	Charleston, W. Va.	222.31
9/20/78	Supplies S. Spencer Moore Co.	Capitol Street Charleston, W. Va.	51.06
9/20/78	Ladish Photography Pictures	826 Carroll Road Charleston, W. Va.	117.00
9/20/78	Peggy Workman reimbursement for supplies	Charleston, W. Va.	18.42
9/20/78	Allen Blueprint & Supply Co. Picture enlargements	811 Virginia St. E. Charleston, W. Va.	395.52
9/22/78	Democratic National Committee Aircraft expense-Vice President	1625 Massachusetts Ave. Washington, D. C.	1,469.38
9/22/78	Democratic National Committee Inflight services-Vice Pres.	Washington, D. C.	65.75
9/22/78	Avis Rent A Car V.Pres's advance man's use	Room 207, Old Executive Off. Building, Washington, D. C.	129.23
9/7/78	Marie Prezioso supplies	Charleston, W. Va.	43.75
9/7/78	Emilie Holroyd Bus express postate reimbursement	Princeton, W. Va.	4.50
10/3/78	Charleston Civic Center-balance Dinner Expenses	Charleston, W. Va.	2,229.61
10/11/78	Shanklin Greenhouse 2626 Conner Dr.	Charleston, W. Va.	80.00

**Statement of Receipts and Expenditures  
For Candidates, Agents, Treasurers or Committees**

This statement is required to be filed according to the provisions of West Virginia Code §3-8-6 within thirty days after the General Election with the Secretary of State, Charleston, West Virginia, for all offices to be filled or issues to be voted upon by the voters of a political division greater than a county. For all offices or issues to be voted upon by the voters of a county or district therein, file this statement with the County Clerk. For all offices to be filled or issues to be voted upon by the voters of a city, file this statement with the City Clerk or Recorder. This statement has been prepared by A. James Manchin, Secretary of State of West Virginia, pursuant to the provisions of West Virginia Code §3-8-6.

(A)

Full Name of Candidate, Agent, Treasurer or Committee West Virginia State Democratic Executive Committee  
Robert J. Burke, Treasurer  
(First) (Last and initial) (Last)

Candidate for, or Agent, Treasurer or Committee in support of the following candidate or cause Democratic Ticket  
(Office sought, or candidate or cause supported)  
State of West Virginia  
(District or Circuit if any)

Party Affiliation (if any) Democratic

Office 2106 Kanawha Blvd., E. Mailing Address Same  
(Number) (Street) (Street Address or Box Number)  
Charleston 25311 Same  
(Town or City) (Zip) (Town or City) (Zip)  
Residence Telephone none Business Telephone 304-342-8122

(B)

The balance of cash and any other sum of money on hand at the beginning of the period covered by this financial statement is \$ 39,483.84  
The balance of cash and any other sum of money on hand at the end of the period covered by this financial statement is \$ 12,158.87

(C)

I hereby certify that the following is a true, complete, and itemized statement of all monies and other tangible things of value contributed or advanced by anyone, together with the full names of all such persons, firms, associations or committees who have made advances or contributions, provided that any contribution totaling more than fifty dollars (\$50.00) by any one contributor is by money order or by check.

**CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS**

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
11/1973	Eva Rath Prario	\$ 5.00			\$
11/1973	Phory Woodall	200.00			
11/1973	Wm. K. Hamilton	50.00			
11/1973	C. H. Amick	50.00			
11/1973	Albert Paolo	50.00			
11/1973	Point Dist. Co.	50.00			
11/1973	James H. Davis III	100.00			

Other proper receipt for other contributions of \$250 or less must be attached to this statement.  
TOTAL \$505.00

Any additional pages needed for other contributions exceeding \$250 must include all of the above requested information.

I further certify that the following is a true, complete, and itemized statement of every FUND RAISING EVENT held during the period covered by this financial statement. A FUND RAISING EVENT means any event such as a dinner, reception, testimonial, cocktail party, auction or similar affair through which contributions are solicited or received by such means as purchase of a ticket, payment of an attendance fee or through purchase of goods and services.

Date of Event	Type of Event	Address of Place Held	Name of Place Held	Total Expenditure
1970-1971				
1971-1972				
1972-1973				
1973-1974				
1974-1975				
1975-1976				
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1977-1978				
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2065-2066				

• **Financial plan** – needed for Fund Raising Events, must include all of the following information:



1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.

... ..

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$\frac{1}{2} \times 10^{-3} \text{ mol/L}$

[illegible]

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL	5 None
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## FUND RAISING EVENT

CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EXCEED \$250  
(Residence, Mailing Address, Business and Occupation must be listed)

(Residence, Mailing Address, Business and Occupation must be listed)

[illegible]

Any additional pages included for Fund Raising Events must include all of the above requested information.

	None
TOTAL	5

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
A	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100

(15)

For each entity, then, all contributions, paid or during the period covered by the financial statements, are reported there, in Section C or Section D or both, and that the total amount of all such contributions is

(2.2)

I, \_\_\_\_\_, of \_\_\_\_\_, West Virginia, do hereby certify that the foregoing is a true and correct statement of the expenditures made by me or on my behalf during the period from \_\_\_\_\_ to \_\_\_\_\_.

PURPOSE OF EXPENDITURE AND TO WHOM (Last Name, M. I., Last Name)		ADDRESS AND MAILING ADDRESS	AMOUNT
10/30/78	Claydon Co. Committee Gen. Election Day Expenses Mr. Ray A. Smith	Big Bend, W. Va.	\$ 300.00
	Claydon Co. Committee Gen. Election Day Expenses Mr. Ray A. Smith	Sand Fork, W. Va.	300.00
	Hardy Co. Committee Gen. Election Day Expenses Mr. Ray A. Smith	P.O. Box 1 Moorefield, W. Va.	300.00
	Monroe Co. Committee Gen. Election Day Expenses Mr. Fred Parker	Rt. 1, Box 40 Greenville, W. Va.	300.00
	Monroe Co. Committee Gen. Election Day Expenses Mr. Charles Miller	Box 31 Lynchburg Springs, W. Va.	300.00
	Pendleton Co. Committee Gen. Election Day Expenses Mr. Paul Horton	P.O. Box 455 Dunklin, West Virginia	300.00
	Pleasant Co. Committee Gen. Election Day Expenses Mr. Thomas Piles	Rt. 2 St. Marys, West Virginia	300.00
	Pocahontas Co. Committee Gen. Election Day Expenses Mr. Guy Baltz	1510 Huntersville Rd. Martinton, W. Va.	300.00
Sub-total			2,400.00
TOTAL			\$ 27,329.97

Any additional pages needed for other expenditures must include all of the above requested information.

(G)

I, \_\_\_\_\_, do hereby certify that this statement lists all financial transactions, as reported above in Sections C, D, and E, beginning on the 31st day of October, 1978, and ending on the 30th day of November, 1978.

(H)

I, \_\_\_\_\_, do hereby certify that the total expenditure for the nomination, election or defeat of my candidacy (or any other person or organization advocating or opposing the nomination, election or defeat of any candidate) or for any other cause, thing or item to be voted upon, in whose behalf an expenditure was made, for the Election is \$88,551.44, which includes all expenditures made as of the date of this statement, including all expenditures previously reported in other statements.)

OATH OR AFFIRMATION

I, \_\_\_\_\_, of \_\_\_\_\_, West Virginia, do hereby swear, depose and say that the foregoing is a true and correct statement, to the best of my knowledge and belief, of all financial transactions made by me or on my behalf during the period covered by this statement.

Robert W. Burke

being duly sworn, deposes and says that the foregoing is a true and correct statement, to the best of his knowledge and belief, of all financial transactions made by him or on his behalf during the period covered by this statement.

Signature of Candidate, Agent or Treasurer

Subscribed and sworn to before me this 20th day of December, 1978.



REPORT OF THE COMMISSIONERS OF THE LAND OFFICE OF THE STATE OF WEST VIRGINIA  
RECEIVED FROM THE COMMISSIONERS OF THE LAND OFFICE OF THE STATE OF WEST VIRGINIA  
THE REPORT OF THE COMMISSIONERS OF THE LAND OFFICE OF THE STATE OF WEST VIRGINIA  
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REPORT OF THE COMMISSIONERS OF THE LAND OFFICE OF THE STATE OF WEST VIRGINIA		RECEIVED FROM THE COMMISSIONERS OF THE LAND OFFICE OF THE STATE OF WEST VIRGINIA	THE REPORT OF THE COMMISSIONERS OF THE LAND OFFICE OF THE STATE OF WEST VIRGINIA
Ritchie Co. Committee			
10/30/79	Gen. Election Day Expenses	Smithville, W.Va.	300.00
	Mr. Eldon Haight		
	Roane Co. Committee		
	Gen. Election Day Expenses	211 2nd St.	
	Mr. Rex Starcher	Spencer, W. Va.	300.00
	Tucker Co. Committee		
	Gen. Election Day Expenses	202 Fourth St.	
	Mr. Forrest Ammentrout	Parsons, W. Va.	300.00
	Wirt Co. Committee		
	Gen. Election Day Expenses	P.O. Box 153	
	Mrs. Faustine Bannan	Elizabeth, W. Va.	300.00
	Berkeley Co. Committee		
	Gen. Election Day Expenses		
	Mr. Goode Coss	Bunker Hill, W. Va.	300.00
	Brooke Co. Committee		
	Gen. Election Day Expenses	R 528 Banfield Ave.	
	Ms. Mary Ciccololla	Follansbee, W. Va.	300.00
	Hampshire Co. Committee		
	Gen. Election Day Expenses	P.O. Box 5	
	Mr. Vernon Whitacre	High View, West Va.	300.00
	Mineral Co. Committee		
	Gen. Election Day Expense	80 Maple Ave.	
	Mr. Kenneth V. Ward	Keyser, W. Va.	300.00
	Preston Co. Committee		
	Gen. Election Day Expenses	Spring Street	
	Mr. Robert Cline	Rowlesburg, W. Va.	300.00
	Jackson Co. Committee		
	Gen. Election Day Expenses	500 Church St.	
	Mr. Joseph R. Goodwin	Ripley, W.a.	500.00
	Lewis Co. Committee		
	Gen. Election Day Expenses	Rt. 4, Box 36-10	
	Mr. Tom Alfred	Weston, W. Va.	500.00
	Randolph Co. Committee		
	Gen. Election Day Expenses	Robert Lee Avenue	
	Mr. Wimpy Valentine	Elkins, W. Va.	500.00
	Summers Co. Committee		
	Gen. Election Day Expenses	P.O. Box 106	
	Mr. Gary Deeds	Jumping Branch, W. Va.	500.00
	Taylor Co. Committee		
	Gen. Election Day Expenses	Rt. 3, Box 410	
	Mr. C. R. Kinsey	Grafton, W. Va.	500.00
	Cabell Co. Committee		
	Gen. Election Day Expenses	P.O. Box 1965	
	Mr. Robert Nelson	Huntington, W. Va.	500.00
	Fayette Co. Committee		
	Gen. Election Day Expenses	P.O. Box 218	
	Mr. Ray A. Goforth	Charlton Heights, W. Va.	500.00
	Harrison Co. Committee		
	Gen. Election Day Expenses	230 Maple Ave.	
	Mr. Jim Shaffer	Clarksburg, West Virginia	500.00
	Marion Co. Committee		
	Gen. Election Day Expenses	313 Professional Bldg.	
	Mr. Dominick Marino	Fairmont, W. Va.	500.00
	Mercer Co. Committee		
	Gen. Election Day Expenses	800 Princeton Ave.	
	Mr. Paige Woodbridge	Bluefield, W. Va.	500.00
	Monongalia Co. Committee		
	Gen. Election Day Expenses	Assessor's Office	
	Mr. John Hoff	Morgantown, West Virginia	500.00
	Putnam Co. Committee		
	Gen. Election Day Expenses	P.O. Box 21	
	Mr. Carlton Lewis	Daniels, W. Va.	500.00
	Wetzel Co. Committee		
	Gen. Election Day Expenses	2305 23rd St.	
	Mr. Jack Moring	Parkersburg, W. Va.	500.00

NAME OF COMMITTEE  
AND TO WHOM  
(Last Name, First Name)

RESIDENCE AND MAILING ADDRESS

AMOUNT

0/30/70	Logan Co. Committee Gen. Election Day Expenses Mr. S. L. Evans	P.O. Box 1495 Logan, West Virginia	500.00
	McDowell Co. Committee Gen. Election Day Expenses Mr. Albert Falvo	Roderfield, W. Va.	500.00
	Mingo Co. Committee Gen. Election Day Expenses Mr. Johnny Owens	Ragland, West Virginia	500.00
	Ohio Co. Committee Gen. Election Day Expenses Mr. Melvin Kahle, Jr.	28 Maple Ave. Wheeling, W. Va.	500.00
	Doone Co. Committee Gen. Election Day Expenses Mr. John Protan	P.O. Box 82 Sylvester, W. Va.	700.00
	Braxton Co. Committee Gen. Election Day Expenses Mr. Eugene Facenive	290 N. Braxton St. Sutton, W. Va.	700.00
	Greenbrier Co. Committee Gen. Election Day Expenses Mr. Chris Walkup	White Sulphur Springs, W. Va.	700.00
	Hancock Co. Committee Gen. Election Day Expenses Mr. Eli Dragesich	100 Powers Road Weirton, W. Va.	700.00
	Lincoln Co. Committee Gen. Election Day Expenses Mr. Wylie Stowers	Rt. 2 Hamlin, W. Va.	700.00
	Marshall Co. Committee Gen. Election Day Expenses Mr. James L. Tennant	P.O. Box 617 Moundsville, W. Va.	700.00
	Mason Co. Committee Gen. Election Day Expenses Mr. Forrest Clark	2212 Jackson Ave. Point Pleasant, W. Va.	700.00
	Nicholas Co. Committee Gen. Election Day Expenses Mr. Shirley Catlip	Craigsville, W. Va.	700.00
	Putnam Co. Committee Gen. Election Day Expenses Mr. Bill Snyder	222 Beechwood Estates Scott Depot, W. Va.	700.00
	Wayne Co. Committee Gen. Election Day Expenses Mr. Lucian Fry	P.O. Box 2007 Wayne, W. Va.	700.00
	Webster Co. Committee Gen. Election Day Expenses Mr. Eugene Coff	P.O. Box 278 Cowen, West Virginia	700.00
	Wetzel Co. Committee Gen. Election Day Expenses Mr. Bill Bailey	Pineville, W. Va.	700.00
	Wetzel Co. Committee Gen. Election Day Expenses Mr. Gene Wayne	P.O. Box 12 Hastings, W. Va.	200.00
	Tyler Co. Committee Gen. Election Day Expenses Mr. Pat Miklas	Rt. 3 Sistersville, W. Va.	200.00
	Grant Co. Committee Gen. Election Day Expenses Mr. Richard Mangold	Petersburg, W. Va.	200.00
	Dodridge Co. Committee Gen. Election Day Expenses Mr. W. E. Williams, Sr.	202 Louise Ave. West Union, W. Va.	200.00
	Political Contribution Mr. E. Rayan	#4 Hilltop Bldg. Phillippi, W. Va.	600.00
	Harlan Co. Committee Gen. Election Day Expenses Mr. Gary Davis	P.O. Box 106 Jumping Branch, W. Va.	200.00

PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)		RESIDENCE AND MAILING ADDRESS	AMOUNT
11/ 1/78	Office Rent Turnage Park East	Charleston, W. Va. 2106 Kanawha Blvd., E.	375.00
11/1/78	Payroll, Jewell Bailey	Charleston, W.Va.	460.91
11/3/78	Political Contribution Roger W. Tompkins	P.O. Box 1386 Charleston, W.Va.	500.00
11/3/78	Political Contribution Lyle Sattes	12 Capitol St. Charleston, W. Va.	500.00
11/3/78	C & P Telephone Co.	Charleston, W. Va.	208.00
11/5/78	Gulf Oil Corp.	Atlanta, Ga.	91.30
11/1/78	Blue Cross Hospital Ser.	Charleston, W.Va.	60.42
11/13/78	Nat. Party Conference-Rooms Dem. Conf. Housing Acct.	Memphis, Tenn.	150.00
11/14/78	Nat. Party Conference-Rooms Dem. Conf. Housing Acct.	Memphis, Tenn.	50.00
11/15/78	Payroll, Jewell Bailey	Charleston, W.Va. -	460.91
11/17/78	C & P Telephone Co. Reg.Ser.	Charleston, W.Va.	217.84
11/17/78	C & P Telephone Co. Measured Service	Charleston, W.Va.	242.63
11/17/78	Xerox Corporation Service	Cincinnati, Ohio	352.05
11/30/78	Payroll-Jewell Bailey	Charleston, W.Va.	460.91
11/1/78	Retirement-Jewell Bailey	Charleston, W.Va.	100.00
Total			<u>\$27,829.97</u>

ATTACHMENT III

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CHARTERED BY ... ..

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\$100.00

For use solely and exclusively in the interest  
of the Democratic Ticket, in conveying voters  
to and from the polls, examining and checking  
lists of registered voters, distributing pamph-  
lets and other printed matter and in posting  
and distributing signs, banners and other  
advertisements.



## FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

February 12, 1979

MEMORANDUM

TO: TOM HASELHORST

FROM: *RPC* BOB COSTA/JOE STOLTZ *JS*

SUBJECT: UNREGISTERED POLITICAL ORGANIZATION

During a recent audit of the West Virginia State Democratic Telethon Committee, the Audit staff was presented with a copy of a State disclosure report of the 1976 Logan County Democratic Campaign Committee ("the County Committee") (Attachment #1), an unregistered political organization.

Based upon a review of the report as outlined below, it is the opinion of the Audit staff that the County Committee has engaged in activity which would require it to register and report in accordance with Sections 433 and 434 of Title 2 of the United States Code.

Registration and Reporting by a Political Committee

Section 433(a) of Title 2 of the United States Code requires each political committee which anticipates receiving contributions or making expenditures during the calendar year in an aggregate amount or value exceeding \$1,000 to file with the Commission a statement of organization within 10 days following the date of the anticipation.

Section 434(a) of Title 2 of the United States Code requires the treasurer of a political committee to file with the Commission reports of receipts and expenditures on prescribed or approved forms.

Our review of the State report revealed a fundraising event held October 28, 1976 which netted proceeds of \$19,350.00. The proceeds of the event **were disbursed by** the County Committee to district coordinators for distribution to precinct captains for the purposes set forth in Chapter 3, Article 8, Section 9 of the Code of West Virginia. According to a representative of the West Virginia Attorney General's office, the section of the code





cited above deals with expenditures of a political committee, a portion of which deals specifically with election day expenses.

It is the opinion of the Audit staff, based upon the information presented, that the distribution mentioned above was made for Get-Out-The Vote activities. As such, according to Advisory Opinion 1978-10, the County Committee would normally be required to allocate the activity between Federal and non-Federal elections on a reasonable basis. It appears reasonable that the portion allocated for Federal elections would exceed \$1,000. As such, the County Committee would normally be required to register and report in accordance with Sections 433 and 434. Therefore, the matter is referred to your Division for consideration along with the matter referred on November 30, 1978 (Attachment #2).

Any questions concerning the matter should be communicated to Ray Lisi on extension 3-4060 or Charlie Hanshaw on extension 3-4155.

Attachments as stated



**Statement of Receipts and Expenditures for Candidates, Agents, Treasurers or Committees**

This statement is required to be filed according to the provisions of West Virginia Code §3-8-5 within 30 days after the date of the Election with the Secretary of State, Charleston, West Virginia, for all offices to be filled or issues to be voted upon by the voters of a political division greater than a county. For all offices to be filled or issues to be voted upon by the voters of a county or district therein, file this statement with the County Clerk. For all offices to be filled or issues to be voted upon by the voters of a city, file this statement with the City Clerk or Recorder. This statement has been prepared by James R. McCartney, Secretary of State of West Virginia, pursuant to the provisions of West Virginia Code §3-8-6.

(A)

Full Name of Candidate, Agent, Treasurer or Committee Thomas A. Tomblin  
(First) (Middle Initial) (Last)

Candidate for; or Agent, Treasurer or Committee in support of the following candidate or cause 1976 Logan County Democratic Campaign Committee  
(Office sought; or candidate or cause supported)  
Logan County  
(District or Circuit if any)

Party Affiliation (if any) Democratic

Residence Justice Addition Box 813  
(Number) (Street) (Street Address or Box Number)

Logan, West Virginia 25601 Logan, West Virginia 25601  
(Town or City) (Zip) (Town or City) (Zip)

Residence Telephone 752-2219 Business Telephone 752-3100

(B)

The balance of cash and any other sum of money on hand at the beginning of the period covered by this financial statement is \$ 10,761.25  
The balance of cash and any other sum of money on hand at the end of the period covered by this financial statement is \$ 342.81

(C)

I hereby certify that the following is a true, complete, and itemized statement of all monies and other tangible things of value contributed or advanced by anyone, together with the full names of all such persons, firms, associations or committees who have made advances or contributions, provided that any contribution totaling more than fifty dollars (\$50.00) by any one contributor is by money order or by check.

**CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS**

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
11-1-76	Mike Hill	\$ 50.00			\$
11-1-76	Claude Ellis	50.00			
11-1-76	Swanzy Evans	50.00			
11-1-76	Paul White	50.00			
11-1-76	David White	50.00			

Any additional pages needed for other contributions of \$250 or less must include all of the above requested information.

TOTAL \$ 250.00

(Residence, Mailing Address, Business and Occupation must be listed)

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
	Mrs. Amos Doss	Box 77 Wilkinson, W. Va.	Grocery	\$1,000.00
	Joe Dingess	Box 987 Chapmanville, W.Va.	Contractor	1,500.00
	Donald D. Lambert	Kistler, West Va.	Foreman	300.00
	Logan County Democratic Executive Committee	Logan, W.Va.		500.00
TOTAL				\$3,300.00

Any additional pages needed for other contributions exceeding \$250 must include all of the above requested information.

(D)

I further certify that the following is a true, complete, and itemized statement of every FUND RAISING EVENT held during the period covered by this financial statement. A FUND RAISING EVENT means any event such as a dinner, reception, testimonial, cocktail party, auction or similar affair through which contributions are solicited or received by such means as purchase of a ticket, payment of an attendance fee or through purchase of goods and services.

#### FUND RAISING EVENTS

Date of Event	October 28, 1976	Date of Event	
Type of Event	Hoot Owl Buffett	Type of Event	
Address of Place Held	Henlawson, West Va.	Address of Place Held	
Name of Place Held	Chief Logan State Park Restaurant	Name of Place Held	
Total Expenditures	\$ 2,169.94	Total Expenditures	\$
Net Receipts	\$ 19,350.00	Net Receipts	\$

Date of Event		Date of Event	
Type of Event		Type of Event	
Address of Place Held		Address of Place Held	
Name of Place Held		Name of Place Held	
Total Expenditures	\$	Total Expenditures	\$
Net Receipts	\$	Net Receipts	\$

Any additional pages needed for Fund Raising Events must include all of the above requested information.

# FUND RAISING EVENT

## CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
10-29-76	D. R. Winters	\$100.00			\$
10-29-76	Denver Mathis	100.00			
10-29-76	Leonard Ware	100.00			
10-29-76	Sammy Dalton	100.00			
10-29-76	Patricia Richmond	100.00			
10-29-76	Doris J. Hall	100.00			
10-29-76	Deanna Lynn Bryant	200.00			
10-29-76	Howard Dalton	200.00			
10-29-76	Phillip R. Cadd	100.00			
10-29-76	Opal Williamson	100.00			
10-29-76	Opal Combs	100.00			

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL \$ 1,300.00

# FUND RAISING EVENT

## CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EXCEED \$250 (Residence, Mailing Address, Business and Occupation must be listed)

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
10-29-76	James A. Trent	Box 145 Wilkinson, W.Va.	Machinist	\$ 1,000.00
10-29-76	George Albright, Jr.	Box 776 Logan, West Va.	Manager	400.00
10-29-76	Woodrow Lowe	613 Stratton Street Logan, West Va.	Circuit Clerk	700.00
10-29-76	J. Thomas Godby	427 Circle Drive Logan, West Va.	Assessor	400.00
10-29-76	Ervin S. Queen	West Logan, W.Va.	Self-employed	1,000.00
10-29-76	Enos Ramey	Box 37 Switzer, W.Va.	Grocery	500.00
10-29-76	Ralph Grimmett	Kistler, W.Va.	Self-employed	800.00
10-29-76	James N. Grubb	313 West Avis Avenue Man, W.Va.	Attorney	700.00
10-29-76	Andy Sos	Box 11 McConnell, W.Va.	service station operator	600.00

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL \$ 6,100.00

(E)

I further certify that all contributions received during the period covered by this financial statement have been reported above in Section C or Section D or both, and that the total amount of all such contributions

is \$ 22,900.00

I further certify that the following is a true, complete, and itemized statement showing the date, amount and purpose of each expenditure made or liability incurred, together with the full name, residence and mailing address of each person, firm, association, or committee to whom each expenditure was made or liability incurred, and the total amount of such expenditures made and liabilities incurred during the period covered by this statement.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
10-15-76	Logan Banner	Logan, West Virginia	1,170.00
10-28-76	Logan News Printers	Logan, West Virginia	\$ 18.75
10-29-76	Park Restaurant	Logan, West Virginia	1,733.75
11-1-76	Logan Bank & Trust	Logan, W. Va. - 18,827.00	250.00 cash
	*TO DISTRICT COORDINATORS to distribute to precinct captains for the purposes set forth in Chapter 3, Article 8, Section 9, of the Code of West Virginia.		19,077.00 *
	<u>DISTRIBUTED TO</u>	<u>AMOUNT</u>	
	Ralph Grimmett	3,750.00	
	Ralph Grimmett	1,100.00	
	Claude Ellis & Swansey Evans	5,100.00	
	Michall H. Hill & Vernon Dingess	4,150.00	
	Harold Hale	3,600.00	
	Claude Ellis	1,377.00	
		<u>\$19,077.00</u>	
11-8-76	Logan Coca-Cola Bot. Co.	Logan, West Va.	24.00
11-8-76	Logan News Printers	Logan, West Va.	300.00
11-29-76	Logan News Printers	Logan, West Va.	97.50
11-29-76	Jean Queen	West Logan, West Va.	136.19
Any additional pages needed for other expenditures must include all of the above requested information.			
TOTAL			<u>\$ 22,557.19</u>

(G)

I further certify that this statement lists all financial transactions, as reported above in Sections C, D, and F, for the period beginning on the 28th day of October, 19 76, and ending on the 1st day of December, 19 76.

(H)

I further certify that the total expenditure for the nomination, election or defeat of my candidacy (or any person or organization advocating or opposing the nomination, election or defeat of any candidate), or the passage or defeat of any issue, thing or item to be voted upon, in whose behalf an expenditure was made

or a contribution was given for the Election is \$ 22,557.19

(This total includes all expenditures made as of the date of this statement, including all expenditures previously reported in other statements.)

### OATH OR AFFIRMATION

State of West Virginia

County of Logan, ss.

Thomas A. Tomblin, being duly sworn, deposes and says that the foregoing is a true and correct statement, to the best of his knowledge and belief, of all financial transactions occurring within the period covered by this statement.

Signature of Candidate, Agent, or Treasurer

Subscribed and sworn to before me this 2nd day of December, 19 76

Notary Public

My Commission expires on the 5th day of April, 19 78

# Statement of Receipts and Expenditures for Candidates, Agents, Treasurers or Committees

This statement is required to be filed according to the provisions of West Virginia Code §3-8-5 within 30 days after the date of the Election with the Secretary of State, Charleston, West Virginia, for all offices to be filled or issues to be voted upon by the voters of a political division greater than a county. For all offices to be filled or issues to be voted upon by the voters of a county or district therein, file this statement with the County Clerk. For all offices to be filled or issues to be voted upon by the voters of a city, file this statement with the City Clerk or Recorder. This statement has been prepared by James R. McCartney, Secretary of State of West Virginia, pursuant to the provisions of West Virginia Code §3-8-6.

(A)

Full Name of Candidate, Agent, Treasurer or Committee Thomas A. Tomblin  
(First) (Middle Initial) (Last)

Candidate for; or Agent, Treasurer or Committee in support of the following candidate or cause 1976 Logan County Democratic Campaign Committee  
(Office sought; or candidate or cause supported)  
Logan County  
(District or Circuit if any)

Party Affiliation (if any) Democratic

Residence Justice Addition Box 813  
(Number) (Street) (Street Address or Box Number)  
Logan, West Virginia 25601 Logan, West Virginia 25601  
(Town or City) (Zip) (Town or City) (Zip)  
Residence Telephone 752-2219 Business Telephone 752-3100

(B)

The balance of cash and any other sum of money on hand at the beginning of the period covered by this financial statement is \$ 10,761.25  
The balance of cash and any other sum of money on hand at the end of the period covered by this financial statement is \$ 342.81

(C)

I hereby certify that the following is a true, complete, and itemized statement of all monies and other tangible things of value contributed or advanced by anyone, together with the full names of all such persons, firms, associations or committees who have made advances or contributions, provided that any contribution totaling more than fifty dollars (\$50.00) by any one contributor is by money order or by check.

## CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
11-1-76	Mike Hill	\$ 50.00			\$
11-1-76	Claude Ellis	50.00			
11-1-76	Swanzy Evans	50.00			
11-1-76	Paul White	50.00			
11-1-76	David White	50.00			

Any additional pages needed for other contributions of \$250 or less must include all of the above requested information.

TOTAL \$ 250.00

(Residence, Mail Address, Business and Occupation must be listed)

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
	Mrs. Amos Doss	Box 77 Wilkinson, W. Va.	Grocery	\$1,000.00
	Joe Dingess	Box 987 Chapmanville, W.Va.	Contractor	1,500.00
	Donald D. Lambert	Kistler, West Va.	Foreman	300.00
	Logan County Democratic Executive Committee	Logan, W.Va.		500.00
TOTAL				\$3,300.00

Any additional pages needed for other contributions exceeding \$250 must include all of the above requested information.

(D)

I further certify that the following is a true, complete, and itemized statement of every FUND RAISING EVENT held during the period covered by this financial statement. A FUND RAISING EVENT means any event such as a dinner, reception, testimonial, cocktail party, auction or similar affair through which contributions are solicited or received by such means as purchase of a ticket, payment of an attendance fee or through purchase of goods and services.

#### FUND RAISING EVENTS

Date of Event	October 28, 1976	Date of Event	
Type of Event	Hoot Owl Buffett	Type of Event	
Address of Place Held	Henlawson, West Va.	Address of Place Held	
Name of Place Held	Chief Logan State Park Restaurant	Name of Place Held	
Total Expenditures	\$ 2,169.94	Total Expenditures	\$
Net Receipts	\$ 19,350.00	Net Receipts	\$

Date of Event		Date of Event	
Type of Event		Type of Event	
Address of Place Held		Address of Place Held	
Name of Place Held		Name of Place Held	
Total Expenditures	\$	Total Expenditures	\$
Net Receipts	\$	Net Receipts	\$

Any additional pages needed for Fund Raising Events must include all of the above requested information.



# CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
10-29-76	D. R. Winters	\$100.00			\$
10-29-76	Denver Mathis	100.00			
10-29-76	Leonard Ware	100.00			
10-29-76	Sammy Dalton	100.00			
10-29-76	Patricia Richmond	100.00			
10-29-76	Doris J. Hall	100.00			
10-29-76	Deanna Lynn Bryant	200.00			
10-29-76	Howard Dalton	200.00			
10-29-76	Phillip R. Cadd	100.00			
10-29-76	Opal Williamson	100.00			
10-29-76	Opal Combs	100.00			

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL \$ 1,300.00

## FUND RAISING EVENT

### CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EXCEED \$250 (Residence, Mailing Address, Business and Occupation must be listed)

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
10-29-76	James A. Trent	Box 145 Wilkinson, W.Va.	Machinist	\$ 1,000.00
10-29-76	George Albright, Jr.	Box 776 Logan, West Va.	Manager	400.00
10-29-76	Woodrow Lowe	613 Stratton Street Logan, West Va.	Circuit Clerk	700.00
10-29-76	J. Thomas Godby	427 Circle Drive Logan, West Va.	Assessor	400.00
10-29-76	Ervin S. Queen	West Logan, W.Va.	Self-employed	1,000.00
10-29-76	Enos Ramey	Box 37 Switzer, W.Va.	Grocery	500.00
10-29-76	Ralph Grinnett	Kistler, W.Va.	Self-employed	800.00
10-29-76	James N. Grubb	313 West Avis Avenue Man, W.Va.	Attorney	700.00
10-29-76	Andy Sos	Box 11 McConnell, W.Va.	service station operator	600.00

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL \$ 6,100.00

(E)

I further certify that all contributions received during the period covered by this financial statement have been reported above in Section C or Section D or both, and that the total amount of all such contributions

is \$ 22,900.00

I hereby certify that the following is true, complete, and itemized statement showing the date, amount and purpose of each expenditure made or liability incurred, together with the full name, residence and mailing address of each person, firm, association, or committee to whom each expenditure was made or liability incurred, and the total amount of such expenditures made and liabilities incurred during the period covered by this statement.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
10-15-76	Logan Banner	Logan, West Virginia	1,170.00
10-28-76	Logan News Printers	Logan, West Virginia	\$ 18.75
10-29-76	Park Restaurant	Logan, West Virginia	1,733.75
11-1-76	Logan Bank & Trust	Logan, W. Va. - 18,827.00 250.00 cash	19,077.00 *
	*TO DISTRICT COORDINATORS to distribute to precinct captains for the purposes set forth in Chapter 3, Article 8, Section 9, of the Code of West Virginia.		
	DISTRIBUTED TO	AMOUNT	
	Ralph Grinnett	3,750.00	
	Ralph Grinnett	1,100.00	
	Claude Ellis & Swansey Evans	5,100.00	
	Michall H. Hill & Vernon Dingess	4,150.00	
	Harold Hale	3,600.00	
	Claude Ellis	1,377.00	
		\$19,077.00	
11-8-76	Logan Coca-Cola Bot. Co.	Logan, West Va.	24.00
11-8-76	Logan News Printers	Logan, West Va.	300.00
11-29-76	Logan News Printers	Logan, West Va.	97.50
11-29-76	Jean Queen	West Logan, West Va.	136.19
Any additional pages needed for other expenditures must include all of the above requested information.			
TOTAL			\$ 22,557.19

(G)

I further certify that this statement lists all financial transactions, as reported above in Sections C, D, and F, for the period beginning on the 28th day of October, 19 76, and ending on the 1st day of December, 19 76.

(H)

I further certify that the total expenditure for the nomination, election or defeat of my candidacy (or any person or organization advocating or opposing the nomination, election or defeat of any candidate), or the passage or defeat of any issue, thing or item to be voted upon, in whose behalf an expenditure was made

or a contribution was given for the Election is \$ 22,557.19

(This total includes all expenditures made as of the date of this statement, including all expenditures previously reported in other statements.)

### OATH OR AFFIRMATION

State of West Virginia

County of Logan, ss.

Thomas A. Tomblin, being duly sworn, deposes and says that the foregoing is a true and correct statement, to the best of his knowledge and belief, of all financial transactions occurring within the period covered by this statement.

Signature of Candidate, Agent, or Treasurer

Subscribed and sworn to before me this 2nd day of December, 19 76

Notary Public

My Commission expires on the 5th day of April, 19 78

November 30, 1978

MEMO TO THE FILE

During the course of the audit of the West Virginia State Democratic Telethon Committee, the auditors performed a cursory review of disclosure reports filed by candidates for Federal office from the State of West Virginia to determine whether all transfers had been disclosed in accordance with 2 U.S.C. 434(b)(4).

As a result of the trace, it was determined that the Keep Nick Rahall In Congress Committee made the following transfers to unregistered political groups within West Virginia for apparent Get Out The Vote Activities:

Committee For a Better Logan County	5-02-78	\$5,000.00
Independent Democrats Committee (Logan County)	5-02-78	3,000.00
Independent Democrats Committee (Logan County)	5-05-78	2,000.00
Mingo County Democratic Executive Committee	5-03-78	2,500.00
Mingo County Democratic Executive Committee	5-05-78	1,500.00

Since this activity totally involves committees not within the scope of the West Virginia State Democratic Telethon Committee audit, the activity was mentioned to the Reports Analysts responsible for reviewing reports of West Virginia Committees to make them aware of the situation in order that they may deem it necessary to pursue the recipient committees as unregistered committees.

cc: ~~Tom~~ Haselhorst,  
Assistant Staff Director  
for Reports Analysis

REQUEST FOR ADDITIONAL INFORMATION - PAGE TWO  
KEEP NICK RAHALL IN CONGRESS COMMITTEE  
30 DAY POST PRIMARY REPORT

On Schedule B you list \$14,000.00 in expenditures made to unregistered committees for election day expenses. Please provide further clarification as to the nature of those expenses.

On Schedule C your report discloses loans from Nick J. Rahall. Please clarify whether the amount loaned to the committee was from the candidate's personal funds, or a note obtained from a bank through the candidate. If the loans are from a bank, please provide the name and address of the lending institution and the interest rates and terms of the loans.

7 9 9 3 3 0 3 6 5 2

**EXPENSES**  
(Operating, Transfers Out, Contributions In Kind,  
Loans, Loan Repayments and Refunds Made)  
Supporting Lines 20a, 21a, and 22a, 22b, and 22c  
of FEC FORM 3

Page 1 of 1 22b  
Line Number

(Use Separate Schedules for  
each numbered line)

Name of CAND, Date of Committee in Full	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Keep Nick Rahall In Congress Committee Full Name, Mailing Address and ZIP Code Committee For a Better Logan County 527 Stratton St. Logan, W. Va.	Expenditure for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Particulars of Expenditure	5/2/78	5,000.00
Independent Democrats Committee Full Name, Mailing Address and ZIP Code P. O. Box 810 Logan, W. Va.	Expenditure for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Particulars of Expenditure	5/2/78 5/5/78	3,000.00 2,000.00
Mingo County Democrat Exec. Full Name, Mailing Address and ZIP Code Rastie Runyon Williamson, W. Va.	Expenditure for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Particulars of Expenditure	5/3/78 5/5/78	2,500.00 1,500.00
Full Name, Mailing Address and ZIP Code	Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
SUBTOTAL of expenditures this day (optional)			\$ 14,000.00
TOTAL of expenditures this day (optional)			\$ 14,000.00





FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Bob Costa

THROUGH: Orlando B. Potter  
Staff Director

FROM: William C. Oldaker  
General Counsel

SUBJECT: Registration of Political Committee--West Virginia

DATE: May 29, 1979

The Office of General Counsel has reviewed the referral and audit report concerning the West Virginia State Democratic Executive Committee ("the Committee") and the West Virginia State Democratic Telethon Committee ("the Telethon Committee"). The audit was conducted pursuant to 2 U.S.C. § 438(a)(8). Based on the information contained in these referrals, we make the following comments.

It is apparent from the Telethon Committee's lack of any Federal activity that it is not a political committee as defined by the Act. 2 U.S.C. § 431(d). Therefore, we agree with the recommendation to administratively terminate this Committee. However, the first paragraph of the Auditors' Statement should reflect that the Committee is not subject to the reporting requirements, rather than the broader statement as to jurisdiction.

In contrast, the Executive Committee appears to have made transfers for purposes which may be characterized as Get-Out-The-Vote activities to individuals and affiliated county committees. Evidence suggests that the amount of activity allocable to influencing Federal elections is in excess of \$1,000. If such is the case, we agree that the Executive Committee falls under the Act's definition of a political committee and is required to register and file reports of receipts and expenditures. The Committee's





reference to guidance provided by the Commission in a purported communication is undocumented and unclear having no import in the present analysis. Therefore, in light of AO 78-10 the language noted on the transfer instructing the transferees to use the funds in a restricted manner does not exculpate them from the reporting and registration requirements. Furthermore, the transferee Committees may become reporting entities if they have in excess of \$1,000 activity in federal elections.

Accordingly, we would suggest that an allocation method be devised pursuant to Commission regulations, and that application be made to determine the status of the Executive Committee and of the unregistered recipient committees.

A9-10



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

May 31, 1979

MEMORANDUM

TO: TOM HASELHORST  
FROM: *RJC* BOB COSTA/JOE STOLTZ *JS*  
SUBJECT: REGISTRATION OF POLITICAL COMMITTEE

Attached is the General Counsel's response to our memorandum of February 5, 1979, in which we requested a legal analysis concerning whether the West Virginia State Democratic Executive Committee has engaged in activities which would require it to register and file reports with the Commission. The General Counsel has concurred with the Audit staff's contention that evidence suggests the amount of activity allocable to influencing Federal elections is in excess of \$1,000. Therefore, the matter is referred to your Division for possible non-filer treatment.

Any questions concerning the matter should be communicated to Ray Lisi or Charlie Hanshaw on extension 3-4155.

Attachment as **stated**





FEDERAL ELECTION COMMISSION

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

hcc  
1

MEMORANDUM

July 13, 1979

TO: WILLIAM OLDAKER

THROUGH: ORLANDO B. POTTER  
STAFF DIRECTOR

FROM: ROBERT COSTA  
THOMAS HASELHORST *THH*

SUBJECT: ALLOCATION OF EXPENSES BY PARTY COMMITTEES

As directed by the Commission, the Reports Analysis Division and the Audit Division have considered the various problems state and local party committees have had in allocating various expenses between their Federal and non-Federal committees. Based on the results of ongoing reviews, the recent audits of state party committees and present Commission Advisory Opinions, the attached recommendation in our opinion, represents a consistent and workable policy for Commission implementation for state and local party committees.

It is recommended that this document, accompanied by comments from the Office of General Counsel, be placed on the earliest possible agenda for Commission consideration.



## ALLOCATION OF EXPENSES BY PARTY COMMITTEES

### I. INTRODUCTION

Recent developments resulting from audits of the State party committees and decisions made by the Commission in Advisory Opinions have prompted the Audit and Reports Analysis Divisions to examine together the nature of required allocation of administrative expenses, pursuant to 11 CFR 106.1(e), and of voter registration and Get-Out-The-Vote (GOTV) expenses.

As a result of this examination, we propose herein certain revisions to the Commission's procedures and recommend revisions of the Code of Federal Regulations with respect to such required allocations. Please note that all of the proposals are made in reference to State and local party political committees and organizations, and not in reference to national committees and organizations of a political party.

### II. PROPOSED REMOVAL FROM 11 CFR 106.1(e) OF REQUIREMENTS FOR ALLOCATION OF ADMINISTRATIVE EXPENSES FOR STATE AND LOCAL PARTY POLITICAL COMMITTEES

The Audit and Reports Analysis Divisions recommend that the Commission's procedures and the Regulations be revised to the extent that administrative expense allocation requirements be removed for State and local party political committees, and that such expenses be handled in a manner consistent with the administrative expenses of separate, segregated funds established pursuant to 2 U.S.C. 441b. This recommendation is based upon the equitable and practical results of such a revision.

In terms of equitability, 2 U.S.C. 441b(b)(2)(C) provides that the term "contribution or expenditure" shall not include the establishment, administration, and solicitation of contributions to a separate, segregated fund utilized for political purposes by a corporation, labor organization, membership organization, cooperative, or corporation without capital stock. Because of this provision, such segregated funds can have available more monies with which to directly influence Federal elections. We suggest that State and local party political committees, established pursuant to 11 CFR 102.6(a)(2)(i), be permitted the same opportunity to reserve their fundings for such direct Federal election use.

In terms of practicality, information obtained during the audit of 67 State party political committees indicates that:

1. A majority of the committees had been established in accordance with 11 CFR 102.6(a)(2)(i), thus requiring the allocation;
2. For a substantial number of the committees, no allocation of administrative expenses existed, resulting in the non-Federal account paying all of the allocable expenses;
3. In most cases, for the committees that did allocate administrative expenses, the method of allocation was normally inadequate due to lack of knowledge by committee officials with respect to defining administrative expenses and familiarity with acceptable formulas for the allocation process.

As a result, many problems were encountered by committees in allocating their administrative expenses. 1/

#### RECOMMENDATION

It is recommended that the Commission, during its revision of Title 2 Regulations, revise 11 CFR 106.1(e) to require such allocation only by National political committees of a political party. It is further recommended that until these regulation changes are implemented, the Commission not initiate any review, audit, or compliance matters based on the provisions of 11 CFR 106.1(e), as this section applies to State and local party political committees.

### III. PROPOSED INTEGRATION OF AO 1978-10 AND 1978-28 INTO CODE OF FEDERAL REGULATIONS, TITLE 11

#### A. BACKGROUND

The Commission determined in AO's 1978-10, 1978-28, and others, that the expenses of a political party organization for voter registration and GOTV are at least in part for the purpose of influencing the election of person(s) to Federal office. The Commission therefore determined that that portion of the expenses attributable to Federal elections must be paid from funds which are lawfully contributed under the Act. (See 2 U.S.C. 441a-g and 11 CFR 102.6.)

1/

Statistics can be made available, if necessary.

For the purposes of this discussion, we shall distinguish between AO 1978-10 and AO 1978-28.

AO 1978-10 involved a registered party political committee which presumably had been established pursuant to 11 CFR 102.6 (a)(2)(i), i.e. it had separate, segregated funds. AO 1978-10 established the fact that a portion of the funds expended for voter registration and GOTV had to be paid from funds lawfully contributed under the Act. Thus, that portion of the funds expended would presumably be paid from the Federal account of the committee.

AO 1978-28 involved a registered party committee. The Commission determined in this Advisory Opinion that a portion of the funds expended for voter registration and GOTV had to be paid from funds permissible under the Act. The allocable portion in this case was not in excess of \$1,000. Thus, the Commission advised the committee to terminate its registration. Had that portion been in excess of \$1,000 or had that portion taken together with other contributions and expenditures made by the committee been in excess of \$1,000, the committee would have had to register and report as a political committee.

The Audit and Reports Analysis Divisions propose that the Commission's decisions regarding allocation of expenses, as stated in the above Advisory Opinions, be explicitly integrated into the Code of Federal Regulations, Title 11. We further propose that the Regulations specify that the allocated Federal portion may be paid from the non-Federal account provided the Federal Committee reimburses the non-Federal entity for the Federally allocated portion (a reverse of the procedure is not acceptable), or handles the portion as an obligation owed pursuant to 2 U.S.C. 434(b)(12). And in order to achieve clarity, we suggest that the definition of expenditure under 11 CFR 100.7 include that portion of voter registration and GOTV expenses which is spent by political party committees and organizations for the purposes of influencing Federal elections.

B. PROPOSED METHOD OF ALLOCATION OF VOTER REGISTRATION AND GOTV EXPENSES

In coordination with the previous proposals, the Audit and Reports Analysis Divisions propose that a Weighted Ballot method be incorporated into the Code of Federal Regulations, Title 11. This method would be used for determining the allocable Federal portion of voter registration and GOTV expenses.



At the present time, there are essentially four different methods which may be used for allocation purposes:

1. That method specified in 11 CFR 106.1(e), i.e. in proportion to the amount of funds expended on Federal and non-Federal elections;
2. Alternative method specified in 11 CFR 106.1(e), i.e. "another reasonable basis";
3. That method approved by the Commission as a guideline in September 1977, i.e. in proportion to the amount of funds received by the Federal account to the total amount received by the Federal and non-Federal accounts;
4. Weighted Ballot Methods described in e.g. AO 1976-72 and AO 1978-28.

We propose that methods 1 and 3 be abolished as alternative methods for determining the amount of voter registration and GOTV expenses which should be allocated to Federal elections, and thereby paid by permissible funds. Methods 1 and 3 clearly seem to be directed towards allocation of administrative expenses. Method 2 provides an open field of methods which may not necessarily represent a proportionate relationship of the benefit received by the Federal candidates and by the non-Federal candidates on the ballot. We therefore recommend that method 2 be revised to read, "another reasonable basis, approved in advance by the Commission and subject to audit."

We suggest then that method 4, or a variation thereof, be incorporated into the Regulations as an available method for determining the amount of voter registration and GOTV expenses which should be allocated to Federal elections. In making this suggestion however, we seek Commission guidance in determining the type of Weighted Ballot method which should be utilized for purposes of allocation.

#### C. WEIGHTED BALLOT METHOD

We present here two alternative methods for allocation based upon a Weighted Ballot scheme. Alternative 1 was prepared and is recommended by the Audit Division. Alternative 2 is a discussion of that method described in AO 1976-72 and AO 1978-28.

The Reports Analysis Division believes that Alternative 1 would provide the most accurate means of determining what benefit Federal candidates would receive through voter registration and GOTV activity, and therefore, what portion of the expenses should be allocated to Federal elections. Based on Committee activity of \$15,000 in voter registration and GOTV expenditures alternative 1 provides the Federally allocated portion to be \$2,223. In contrast, alternative 2 only provides the Federally allocated portion to be \$925.50. However, the Reports Analysis Division believes that Alternative 1 would not be practical for use by party political committees and organizations. The accuracy of the method is dependent upon the complexity of the formula. Thus it may well be the case that the accounting and mathematical sophistication of the personnel within these committees and organizations may not be of such a degree that this alternative would be useable in practice. Therefore, Reports Analysis Division prepared and recommends adoption of Alternative 2.

#### 1. ALTERNATIVE 1

By this alternative method, there is a proportionate relationship between the amount allocated for a particular office and the number of voters casting votes for that office. Thus, a committee would determine the offices which are on the ballot(s) within the area in which it is active. For each office, a weighting would be applied, based upon the fraction of the population within the area which votes and elects a person to that office. For example, a GOTV drive in a Congressional District would reach voters who may be considered, for purposes of the calculation, the electorate which decides who fills the office of Governor, U.S. Senator, U.S. Representative and State Senator which represents the District as a whole. The result is, "Weight Applied to the Office." The number of offices on the ballot is then determined. The Weight Applied to the Office is then multiplied by the Number of Offices on the Ballot. The result is the "Weight for Allocation." To determine the percentage for allocation, one divides the Weight for Allocation (Federal Office total) by Weight for Allocation (All Offices). This percentage is then applied to the amount of allocable expenditures to determine the Federally allocable amount. (See Example 1.)

With respect to the Voter Registration and GOTV expenditures, the Audit staff has encountered instances in which these expenditures, as well as total administrative expenditures, have been made from a non-Federal committee's account. There is no

problem in making the expenditures from the non-Federal account provided the Federal committee reimburses the non-Federal entity for the Federally allocated portion (a reverse of the procedure is not acceptable), or handles the portion as an obligation owed pursuant to 2 U.S.C. 434(b)(12). However, if the obligation exceeds \$1,000, a registration and reporting requirement would be triggered on the part of the non-Federal entity, absent a reimbursement by the Federal entity of that amount of the obligation which exceeds \$1,000.

## 2. ALTERNATIVE 2

The Weighted Ballot method, as described in AO 1976-72 and AO 1978-28, involves the placing of "proportionately more weight" on the Federal offices on the ballot, and then determining the ratio of the number of Federal offices, with the weighting, to the total number of expenditures subject to allocation. The resulting amount would be the Federally allocable portion.

Thus, in AO 1976-72, there were 188 separate races in Illinois, 25 of which were for Federal office, five for statewide office, and 158 for State legislative offices. The Illinois Republican State Central Committee asked whether 25/188, or 15%/85% would be a proper allocation between the Federal and non-Federal candidates.

The Commission stated that in the situation described, a reasonable allocation of Federal to non-Federal expenditures would be 1/3 to 2/3, reflecting the view "that the Federal offices should be given proportionately more weight, and not be equated on a one-to-one basis with, for example, State legislative offices."

In AO 1978-28, Washoe County Republican Party Federal Committee stated that there was one at-large seat in the United States House of Representatives, and that this was the only Federal office on the ballot. The Commission learned that other offices on the ballot were 6 statewide executive offices, at least 7 countywide executive offices, and approximately 13 State legislative offices. In this instance, the Commission considered a 10% estimate allocation for the Federal office to be reasonable.

We believe that were this alternative to be accepted, the Commission should provide a specific value with respect to the additional weighting which is to be placed on the Federal offices on a ballot. The Reports Analysis Division recommends a weighting value of 2.5, as this approximates the weighting applied in

AO 1976-72 and AO 1978-28. We emphasize however that the Commission should adopt whatever weighting it feels to be reasonable.

Thus, under this method, a committee would determine the offices which are on the ballot(s) within the area in which it is active. The number of Federal offices is multiplied by the additional weighting, e.g. 2.5. This amount is then divided by the total number of offices on the ballot, and this amount is multiplied by 100. The resulting percentage is then applied to the amount of allocable expenditures to determine the Federally allocable amount. (See Example 2.)

As with Alternative 1, it is our opinion that there is no problem in making the expenditures from the non-Federal account provided the Federal committee reimburses the non-Federal entity for the Federally allocated portion (a reverse of this procedure is not acceptable), or handles the portion as an obligation owed pursuant to 2 U.S.C. 434(b)(12). However, were that obligation to exceed \$1,000, a registration and reporting requirement would be triggered on the part of the non-Federal entity, absent a reimbursement by the Federal entity of that amount of the obligation which exceeds \$1,000.

#### D. USE OF THE WEIGHTED BALLOT METHOD

The design of the Weighted Ballot Method and the expenses to which it is to be applied are such that it should be used by political party committees and organizations on an ongoing basis.

Thus, the committees and organizations which will use the method should determine shortly after an election in which a Federal candidate is nominated or elected what the allocation should be for the next election in which a Federal candidate is nominated or elected. This determination will be based upon what offices will be on the ballot for the next election, and not what offices were on the ballot in the previous election.

Once a formulation is made, shortly after an election in which a candidate for Federal office is nominated or elected, then that formulation should be used until the next election in which a candidate for Federal office is nominated or elected. By using the method in this way, the allocation for Federal elections will reflect the weighting of the ballot for the next future election in which a candidate(s) for Federal office is on the ballot.

Under this method, conventions for nominating purposes would not be viewed as primary elections, as voter registration and GOTV activity would have little, if any, effect upon the nominations at the convention.



If a special election must be held for a Federal office, the committees and organizations will be required to allocate such expenses upon the weighting of the ballot for the special election. That allocation would be applied from the date when it was determined when the special election would be held to the date of the special election. Shortly after the special election, a new formulation would be based upon the offices on the ballot for the next election in which a candidate for Federal office is nominated or elected, and that formulation would be used until that next election.

In proposing this use of the Weighted Ballot method, we propose that GOTV expenses, made in connection with elections in which only candidates for State or local office will be nominated or elected, be exempted from those expenditures to which the allocation must be applied.

#### RECOMMENDATIONS

1. It is recommended that the Commission determine that the following methods are not acceptable for the allocation of voter registration and GOTV expenses.
  - a. That method specified in 11 CFR 106.1(e), i.e. in proportion to the amount of funds expended on Federal and non-Federal elections.
  - b. The Commission's September 1977, guideline, i.e. in proportion to the amount of funds received by the Federal account to the total amount received by the Federal and non-Federal accounts.
2. It is recommended that the Commission revise the alternative method specified in 11 CFR 106.1(e), i.e. "another reasonable basis," to read, "another reasonable basis, approved in advance by the Commission and subject to audit."
3. It is recommended that the Commission adopt the Weighted Ballot Method for the allocation of voter registration and GOTV expenditures as outlined in:
  - a. Alternative 1 which requires an allocation based on the proportionate relationship between the amount allocated for a particular office and the number of voters casting votes for that office; or
  - b. Alternative 2 which requires the Federal offices to be weighted by factor of 2.5 with this amount then divided by the total number of offices on the ballot.
4. It is recommended that the Commission, during its revision of the Title 2 Regulations, make the appropriate revisions to require such allocation.

# OVERALL RECOMMENDATION

It is further recommended the Public Information Division prepare a notice to be sent to all party committees advising them of the above policy decisions and the pending changes to the Regulations. This notice should further include an explanation of the method of allocation to be used, a description of the expenditures to which it would be applied, and an explanation of its use, as detailed under Section III.D., "Use of the Weighted Ballot Method."

## ALTERNATIVE 1

### STATEWIDE GOTV EFFORT

By using the official general election ballot of a State, the following offices were ranked and "weights" applied. Amount of allocable GOTV expenditures is \$15,000.

<u>Offices Being Sought</u>	<u>Weight Applied to the Office 2/</u>	<u>#Offices On Ballot</u>	<u>Weight for Allocation</u>
U.S. Senate	1	1	1
U.S. Representative (5 Districts)	1/5	5	1
Governor	1	1	1
Other Statewide Offices	1	7	7
State Board of Education (1/2 is used because total seats is 10, 1/2 seats up for election, 1/2 electorate votes for these seats)	1/5x1/2=1/10	5	5/10=.5
State Senate	1/40	40	40/40=1
State Representative	1/125	125	125/125=1
Other State and Local Offices	1/50*	50	50/50=1
			Total = 13.5



Allocable Portions--

Federal:  $2 \div 13.5 = 14.82\%$

Non-Federal:  $11.5 \div 13.5 = 85.18\%$

Formula

Weight for Federal Allocation x allocable GOTV and Voter Registration expenditures paid 14.82% of \$15,000 = \$2,223 Federally Allocated Portion.

\* The term other State and local offices could be further delineated if necessary based on the type of office and fraction of the statewide electorate which decides that office. For example, included in the 50 would be judge, mayor, city or county council seats, etc., which could be computed as separate line items in the calculations as follows:

<u>Office</u>	<u>Weight</u>	<u>#</u>	<u>Weight for Allocation</u>
Judge	1/10	10	1
Mayor (7 mayors elected by 50% of the State's population)	1/14	7	$\frac{1}{2}$
Council Seats (33 seats elected by 50% of the State's popula- tion)	1/66	33	$\frac{1}{2}$ adjusted incremental weight for allocation

2/ According to AO 1976-72, a Federal candidate would be weighted the same as a non-Federal candidate who is running for a statewide elective office (i.e. U.S. Senator = Governor; U.S. Representative = State Attorney General). The Audit staff feels that a Federal candidate not elected on a statewide basis (most U.S. Representatives) should not be weighted the same as a non-Federal candidate who is elected on a statewide basis, but rather weighted based on the fraction of the electorate who elects a person for that Federal office. See U.S. Representative Weighting in Example 1. Furthermore, it follows that non-Federal non-statewide elective office candidates would be assigned a proportionately lesser weight.

ALTERNATIVE 2 3/

The following offices represent a listing of the separate races, as on the general election ballot, within the jurisdiction of the State Central Committee. Amount of allocable expenditures is \$15,000.

<u>Offices Being Sought</u>	<u>Number of Separate Races for Office</u>
U.S. Senate	1
U.S. Representative (5 Districts)	5
Governor	1
Other Statewide Offices	7
State Board of Education	5
State Senate	40
State Representative	125
Other State and Local Offices	50

3/ Please note that this example uses the same figures as those used in the example to Alternative 1.

Steps to Determine Amount of Allocation (Federal)

Determine number of Federal offices	-6
Determine total number of offices	-234
Apply weighting to Federal offices (In this example, we shall apply a 2.5 weighting, as this approximates the weighting used in AO 1976-72 and AO 1978-28)	-6 X 2.5 = 15
Establish Proportion	-15/243*
Determine Percentage	-6.17%
Apply Percentage to Amount of Allocable Expenditures	-6.17% of \$15,000=\$925.50

Result: \$925.50 represents the Federal Committee's allocable portion.

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\* Number of separate races for office (234) + nine (9) additional offices due to additional weight applied to Federal candidates.

Memo to the file:

From: Bobby Werfel

Re: WV State Democratic Executive Cmte - unregistered

Date: August 20, 1979

During the course of the WV State Democratic Telethon Cmte, it was determined that the WV State Dem. Exec. Cmte. should register and report with the FEC. This recommendation was referred to OGC. OGC commented that if allocable Fed. candidate support exceeded \$1,000, the cmte. should register. They also noted that an allocation method should be devised and applied to this cmte. The above mentioned method was prepared by the Audit and Reports Analysis Divisions and as of this date is in the General Counsel's office for review.

Aug. 8 - Fred Eiland (Press Office) called me regarding an inquiry from the Press relating to this unreg. cmte. The press office released an audit of the WV Rep. State cmte. and it appears that this audit report generated questions relating to a "possible" unregistered Dem. party cmte. FE and I decided that we could not give out any information on this matter at this time.

Aug. 14 - Charlie Henshaw (audit) questioned our holding of the M letter. I explained that according to OGC's memo it appeared that we were to hold the letter until the allocation method was approved by the Commission. (FE called audit about the matter before he could reach me)

Further research of this problem indicates that application of any past allocation method used (and one of the recommended formulas) would require the cmte to register and report.

Aug. 17 - The generation of the M letter for the Exec. cmte was discussed with Tom Haselhorst. He advised that the M letters be sent to the committee and place the burden on them to register or notify us why they were not required to file with the FEC.

FYI :

The attached four SV's were referred, without backup, from Audit. The information in the Audit referrals has been incorporated into the SV notices.

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Can audit provide any backup to attach to these letters?

It seems to me that the U.V.s. letter in particular should have more explanation as to the basis for the allegations.

OSP 9/11

Memo to the File:

Allocation/West Virginia Committees  
11/7/79/Greevy  
Meeting with Ken Gross  
and: Bobby Werfel  
      Fran Hagan  
      Rick Halter  
      Dug Greevy

The above met this day to discuss the proposal which Audit and RAD jointly prepared and submitted to OGC regarding Allocation of Expenses by Party Committees/7/13/79.

Gross stated that Claire Lindsay had written a proposal in response to the Audit/RAD proposal prior to her departure. We discussed the need to have some specific guidelines for committees to follow if in fact we determine that action should be pursued against them.

However, we noted that the Commission thus far has not provided any certain guidance, particularly in the case of GOTV/ voter registration expenses made by committees which do not have segregated accounts.

Gross acknowledged our dilemma. In particular, we stated that there are several referrals received from Audit by RAD regarding WV committees which expended in excess of \$1,000 for GOTV. Based upon various formulas, the committees may or may not have to register with FEC. We stated that we did not think it right to send letters to the committees unless we could be more specific as to why they qualify as political committees.

Gross stated that he would forward to us a copy of the Lindsay proposal, and that he would review the amounts in question for the WV committees.

We are to respond to the Lindsay proposal as soon as possible so that a final decision can be made on this matter.

NOTE: COPY OF LINDSAY PROPOSAL AND GREEVY RESPONSE OVERLEAF



DRAFT

MEMORANDUM TO: Robert Costa/Tom Haselhorst  
THROUGH: Orlando B. Potter  
FROM: William C. Oldaker  
SUBJECT: Allocation of Expenses by Party Committees

The Office of General Counsel has reviewed the memorandum from the Audit and Reports Analysis Divisions concerning allocation of expenses by Party Committees, and we make the following comments.

Allocation of Administrative Expenses

2 U.S.C. § 441b prohibits corporations and labor unions from making contributions or expenditures, including direct or indirect payments, in connection with Federal elections. Consequently, 11 C.F.R. § 106.1(e) requires party committees and other political committees which have Federal committees to allocate administrative expenses on a reasonable basis between their Federal and non-Federal accounts in proportion to the amount of funds expended on Federal and non-Federal elections, or on another reasonable basis. This regulation is designed to prevent the indirect use of corporate or union funds to subsidize the operating expenses of Federal committees.

On the other hand, 2 U.S.C. § 441b(b)(2) specifically exempts from the definition of "contribution or expenditure" expenses for the establishment, administration and solicitation of contributions to a separate, segregated fund utilized for political purposes by a corporation, labor organization or membership organization. This exception permits these organizations to use monies otherwise prohibited under 2 U.S.C. § 441b to defray the administrative expenses of separate, segregated funds. However, this exception is narrowly drawn and does not include party committees. Absent a statutory amendment that exempts payment of administrative expenses on behalf of party committees from the definition of contribution or expenditure, payment of such expenses by a committee or account which contains corporate or union funds would be a violation of 2 U.S.C. § 441b.

The Commission may exercise its prosecutorial discretion in deciding whether or not to pursue instances of party committees failing to allocate administrative expenses; however, we would not recommend dropping this regulation altogether as suggested by the Audit and Reports Analysis Divisions. The regulation is consistent with the statute and to eliminate it would contravene the intent of 2 U.S.C. § 441b.

3

Allocation of Get Out the Vote and Voter Registration Expenses

The Office of General Counsel agrees with the Audit and Reports Analysis Divisions that a regulation should be written requiring party committees and PACs to allocate get out the vote and voter registration expenses along with other administrative expenses in accordance with specific methods and conditions set out in various Commission advisory opinions. We also agree that the definition of expenditure under 11 C.F.R. § 100.7 could be expanded to encompass that portion of voter registration not otherwise exempted, and get out the vote expenses which are spent by party committees and PACs for the purpose of influencing Federal elections. Alternatively, the Commission could provide in the regulations a definition of administrative expenses which included get out the vote and voter registration expenses.

Insofar as formulas for get out the vote and voter registration allocation are concerned, we recommend incorporating into the regulations those formulas approved by the Commission in 11 C.F.R. § 106.1(c), AO 1978-28 and AO 1978-102. These formulas are:

- 1) Allocate Federal and state get out the vote and voter registration expenses in a ratio of the amount of funds expended by the Federal committee for Federal elections to the amount of funds expended by the organization for state and Federal elections combined. (11 C.F.R. § 100.1(e)). 1/
- 2) Allocate Federal and state get out the vote and voter registration expenses in a ratio of the amount of funds received by reporting Federal committee to all funds received by party organization for both Federal and state election purposes (AO 1978-28).

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1/ This formula should be clarified in the revised regulations to exclude administrative expenses in the calculation of the amount of funds expended by the Federal committee and the amount of funds expended by Federal and state committees combined. The proportion, therefore, is calculated without the addition of administrative expenses. Otherwise the amount of the administrative expenses is counted into the proportion and then divided again by application of the state/federal ratio ~~divided~~ resulting in a distorted comparison.

3) ~~Allocate Federal and state get out the vote and voter registration expenses in a ratio of the amount of funds received by the Federal committee to all funds received by the organization for both Federal and state elections. (AO 1978-28).~~

3/4) Allocate Federal and state get out the vote and voter registration expenses in a ratio of the number of Federal candidates seeking election in the area of the get out the vote or voter registration effort and targeted or endorsed in the drive to the total number of all candidates -- Federal, state and local -- seeking election in that area which are targeted or endorsed by the get out the vote or voter registration effort. (AO 1978-102).

Incorporation of methods 1 and 2, above, into the regulations is consistent with the Commission's statement in AO 1978-50 that get out the vote and voter registration expenditures are considered administrative expenses and may be allocated in the same manner as administrative expenses.

Allocation method number 3, above, comes from the Commission's most recent Advisory Opinion on the subject of get out the vote and voter registration expense allocation, AO 1978-102. This advisory opinion appears to reverse two previous Commission statements -- one in AO 1976-72 and another in AO 1978-28. In AO 1976-72, the Commission stated that Federal offices should be given greater weight than state and local offices in administrative expense allocations. In AO 1978-28, the Commission noted that a reasonable formula in allocation of get out the vote and voter registration expenses is calculated by taking the ratio of the number of ballot positions for Federal office in the next election to the number of positions for "comparable" state offices in the next election. 2/

On the other hand AO 1978-102 applies an allocation formula that gives equal weight to Federal, state and local offices reached by the get out the vote and registration drives.

We believe that, in addition to the expenditure and receipt allocation formulas found in methods 1 and 2 above, the Commission should approve allocation method 3 which gives equal weight to

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2/ Comparable is not defined in the AO but we assume that this means statewide elective offices are counted in the calculation, leaving out all other state and local offices which appear on the ballot. This allocation method is also a weighted approach.

Federal, state and local candidates rather than the weighted methods recommended by the Audit and Reports Analysis Divisions. Since the Commission has recognized in AO 1978-102 an allocation formula for get out the vote expenses in which Federal, state and local offices figure equally, we believe the formulas proposed by the Audit and Reports Analysis Divisions are no longer appropriate.

Furthermore, allocation method number 3 recognizes that Federal offices may not receive any more benefit from non-Federal offices in most get out the vote and voter registration activity, be it by a political action committee, party committee or any type of political committee.

The Office of General Counsel believes that the complexity of the weighted-ballot allocation formulas proposed by the Reports Analysis Division and, particularly, the Audit Division, would ~~contribute to reduced compliance with the allocation requirement.~~ *result in* More importantly, such weighted ballot methods would place unreasonable burdens on committees ~~which must allocate expenses.~~ *by the committee*

Finally, while the Office of General Counsel agrees that other methods of allocation proposed by political committees should be approved in advance by the Commission, we do not believe that the regulation need specify what such allocation would also be "subject to audit." *10-1-*

#### RECOMMENDATIONS

In order to clarify where this Office's recommendations differ from those of the Audit and Reports Analysis Division's, we shall list our recommendations as they relate to the four recommendations from the other two Divisions:

1. That the Commission approve in revised regulations the use of the following two methods of allocation for voter registration and get out the vote expenses.
  - a. The method specified in 11 C.F.R. § 106.1(e), i.e. in proportion to the amount of funds expended on Federal and non-Federal elections -- however, with the condition that administrative expenses be excluded from the expended funds considered for purposes of drawing the ratio.
  - b. The method specified in the Commission's September 1977 guideline and AO 1978-28, i.e. in proportion to the amount of funds received by the Federal account to the total amount received by the Federal and non-Federal accounts.

2. It is recommended that the Commission revise the alternative method specified in 11 C.F.R. § 106.1(e) to read, "another reasonable basis, approved in advance by the Commission."

3. Adopt as a third method of allocation for get out the vote and voter registration, in addition to those methods recommended in recommendation 1 above, a method of allocation which uses the proportion of the number of Federal candidates targeted or endorsed by a get out the vote/voter registration drive to the total number of *(Candidates)* -- Federal, state and local -- in a region targeted or endorsed by the get out the vote/voter reegistration drive. Do not adopt the weighted ballot alternatives 1 or 2 as proposed by the Audit and Reports Analysis Divisions.

4. Direct the staff to draft appropriate revisions in Title 2 Regulations requiring allocation for get out the vote and voter registration expenses.



RAD (Garry Response)

In terms of complexity, would it not be less complex were there to be just one formula available to committees? For instance, the ballot position formula.

In terms of burden, is it not a burden for those committees which base allocation on the amount of funds expended by the Federal account, to the amount expended by both accounts, to have to subtract the amount of administrative expenses from the totals prior to determining the ratio?

Would it not be better to have just one formula, the ballot position, available? By using this formula, there would probably be a truer representation of the breakdown for each account, for administrative purposes, and for the allocation of GOTV and voter registration. In addition, it would be easier to inform the committees of the use of this formula, and the formula would apply to all committees (the first two formulas can be used only by committees which have segregated accounts.) Or does application of the third formula presume the existence of segregated accounts?

Other than these comments, I can live with OGC's memo. I believe I would however strongly recommend that the only methods available for allocation of any kind (administrative/GOTV/voter registration) be the ballot position method or any other method "approved in advance by the Commission".

If we cannot succeed in this recommendation, I would suggest that the Regulations specify that only one formula can be used during each two year period. The two year period would begin with January first following a general Federal election.

Hand Delivered to

Frank Hagan

11/21/79



Memo to the File:

Greevy

Re: Allocation

1/22/80

Ken Gross informed Bobby and me that he has a draft of a response to RAD's memo of 7/13/79. I wanted to take a look at it prior to my drafting a proposal for the Regulations involving allocation.

I saw the draft, although I was told that I could neither take it nor copy it. With respect to specific allocation methods, it more or less follows RAD's proposal, although the additional weighting for Federal candidates is not specified.



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 25, 1980

MEMORANDUM

TO: Office of General Counsel  
THROUGH: Orlando B. Potter  
FROM: Thomas J. Haselhorst *TH*  
SUBJECT: Comments on Revision of the Regulations

Attached are comments prepared by the Reports Analysis Division regarding revisions to the Regulations. If you have any questions or require clarification, please do not hesitate to contact Bobby Werfel, ext. 34048.

Attachment

106.1(e)

- (1) Party committees and other political committees which have established Federal campaign committees pursuant to 11 CFR 102.5(a)(1) shall allocate administrative expenses on a reasonable basis between their Federal and non-Federal accounts. For purposes of this allocation, one of the following methods shall be used for determining the amount of administrative expenses which shall be paid by the Federal account:
- (i) Apply the following proportion to the organization's total amount of administrative expenses. The proportion of the amount of funds expended by the Federal committee for Federal elections to the amount of funds expended by the organization for state, local, and Federal elections combined. For purposes of determining the proportion to be applied, the amount of administrative expenses paid by the Federal and non-Federal accounts shall not be used.
  - (ii) Apply the following proportion to the organization's total amount of administrative expenses. The proportion of the amount of funds received by the Federal committee, during the calendar year, to the amount of funds received by the organization, during the calendar year. For purposes of determining the proportion to be applied, receipts are contributions, transfers, loans, and funds derived from commercial and non-commercial investments.
  - (iii) Determine on a direct cost basis the amount of administrative expenses of the organization which should be paid by the Federal committee.
  - (iv) Any other reasonable method approved in advance by the Commission,

In the event that a committee chooses to use the method provided in (i) or (ii) above, that method shall be used on a calendar-year to calendar-year basis.

- (2) Party committees and other political committees which have established Federal campaign committees pursuant to 11 CFR 102.5(a)(1) shall allocate expenses for voter registration and get-out-the-vote efforts, not otherwise exempted under 11 CFR 100.7(b) or below. For purposes of this allocation, one of the following methods shall be used for determining the amount of such expenses which shall be paid by the Federal account.
- (i) Apply the proportion provided in 11 CFR 106.1(e)(1)(i).
  - (ii) Apply the proportion provided in 11 CFR 106.1(e)(1)(ii).
  - (iii) Apply the following proportion to such expenses. The proportion of the number of Federal offices on the ballot(s) in which the committee is active, multiplied by 2.5, to the total number of offices on the ballot(s) in which the committee is active. For purposes of this method, the ballot(s) to be used are those for the next election in which a Federal ~~election~~ <sup>office</sup> is or will be on the ballot.
  - (iv) Any other reasonable method approved in advance by the Commission.

For purposes of this provision, get-out-the-vote expenses are not required to be allocated if they are made during a year in which a Federal election will not be held and they are directed towards an election in which there are no Federal candidates.

106.1(e)

- (3) Party committees and other political committees which have established political committees pursuant to 11 CFR 102.5(a)(2) shall pay all of their expenses for voter registration and get-out-the-vote efforts from their single accounts.
- (4) Party committees and other committees which have not been established pursuant to 11 CFR 102.5(a) shall use the method presented in 11 CFR 106.1(2)(iii) or (iv) for determining:

(i) The amount of voter registration and get-out-the-vote expenses which shall be paid by contributions subject to the limitations and prohibitions of the Act; and

(ii) Whether the committee meets the definition of political committee in 11 CFR 100.14(a) or (c) by virtue of its expenses for voter registration and get-out-the-vote efforts, as taken together with other expenditures made by the committee.

For purposes of this provision, get-out-the-vote expenses are not to be considered as expenditures if they are made during a year in which a Federal election will not be held and they are directed towards an election in which there are no Federal candidates.

- (5) For party committees and other political committees which have established Federal campaign committees pursuant to 11 CFR 102.5(a)(1), the portion of expenses allocated to the Federal account, in accordance with 11 CFR 106.1(e)(1) and (2), may be paid by the non-Federal account(s) provided:

(i) The funds in the non-Federal account(s) are permissible under the Act; and

(ii) The amount paid by the non-Federal account on behalf of the Federal account will be reported, in accordance with 11 CFR 104, as a debt owed by the Federal committee to the non-Federal account(s). To the extent that the outstanding debt owed by the Federal account to the non-Federal account(s), under this section, does not remain outstanding for more than 30 days, the payment by the non-Federal account(s), on behalf of the Federal account, will not be an expenditure under 11 CFR 100.7(a).

REPORTS ANALYSIS REFERRAL SHEET

DATE March 28, 1980  
TO: Office of General Counsel  
THROUGH: STAFF DIRECTOR  
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

ANALYST Dug Greevy  
TEAM CHIEF Bobby Werfel  
COMPLIANCE REVIEW OK

CANDIDATE/COMMITTEE: West Virginia State Democratic Executive Committee  
TREASURER:  
ADDRESS: 2106 Kanawha Boulevard, E  
Charleston, WV 25311  
AFFILIATE(S):

ALLEGATION(S): Unregistered Political Committee CITE: 2 U.S.C. 433 & 434 ATTACHMENT(S) A & B

DATE INITIATED: 5/31/79

MANNER IN WHICH REVIEW WAS INITIATED: Referral from Audit Division  
☐ Normal Review ☐ Other: ATTACHMENT A  
☐ Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM \_\_\_\_\_ TO \_\_\_\_\_

TOTAL RECEIPTS \$ \_\_\_\_\_ TOTAL EXPENDITURES \$ \_\_\_\_\_

CASH ON HAND \$ \_\_\_\_\_ DEBTS \$ \_\_\_\_\_

HISTORY:

RESULTS OF REVIEW: ATTACHMENT  
None

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT  
None

REASON(S) FOR REFERRAL: ATTACHMENT  
See Cover Memo: Haselhorst to OGC

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT  
None

OTHER RELEVANT INFORMATION: ATTACHMENT  
Letter Prepared to Send to Committee C  
Orlando Potter's comment on Prepared Letter, 9/11/79 D  
Memo to the File: Greevy, 11/7/79 E  
Note: Attachment B discovered after preparation of Attachment C

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:  
None



## FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

May 31, 1979

MEMORANDUM

TO: TOM HASELHORST  
FROM: *RJC* BOB COSTA/JOE STOLTZ *[Signature]*  
SUBJECT: REGISTRATION OF POLITICAL COMMITTEE

Attached is the General Counsel's response to our memorandum of February 5, 1979, in which we requested a legal analysis concerning whether the West Virginia State Democratic Executive Committee has engaged in activities which would require it to register and file reports with the Commission. The General Counsel has concurred with the Audit staff's contention that evidence suggests the amount of activity allocable to influencing Federal elections is in excess of \$1,000. Therefore, the matter is referred to your Division for possible non-filer treatment.

Any questions concerning the matter should be communicated to Ray Lisi or Charlie Hanshaw on extension 3-4155.

Attachment as stated







## FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

### MEMORANDUM

TO: Bob Costa

THROUGH: Orlando B. Potter *OB.P.*  
Staff Director

FROM: William C. Oldaker *W.C.O.*  
General Counsel

SUBJECT: Registration of Political Committee--West Virginia

DATE: May 29, 1979

The Office of General Counsel has reviewed the referral and audit report concerning the West Virginia State Democratic Executive Committee ("the Committee") and the West Virginia State Democratic Telethon Committee ("the Telethon Committee"). The audit was conducted pursuant to 2 U.S.C. § 438(a)(8). Based on the information contained in these referrals, we make the following comments.

It is apparent from the Telethon Committee's lack of any Federal activity that it is not a political committee as defined by the Act. 2 U.S.C. § 431(d). Therefore, we agree with the recommendation to administratively terminate this Committee. However, the first paragraph of the Auditors' Statement should reflect that the Committee is not subject to the reporting requirements, rather than the broader statement as to jurisdiction.

In contrast, the Executive Committee appears to have made transfers for purposes which may be characterized as Get-Out-The-Vote activities to individuals and affiliated county committees. Evidence suggests that the amount of activity allocable to influencing Federal elections is in excess of \$1,000. If such is the case, we agree that the Executive Committee falls under the Act's definition of a political committee and is required to register and file reports of receipts and expenditures. The Committee's



reference to guidance provided by the Commission in a purported communication is undocumented and unclear having no import in the present analysis. Therefore, in light of AO 78-10 the language noted on the transfer instructing the transferees to use the funds in a restricted manner does not exculpate them from the reporting and registration requirements. Furthermore, the transferee Committees may become reporting entities if they have in excess of \$1,000 activity in federal elections.

Accordingly, we would suggest that an allocation method be devised pursuant to Commission regulations, and that application be made to determine the status of the Executive Committee and of the unregistered recipient committees.



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

February 5, 1979

MEMORANDUM

TO : BILL OLDAKER

THROUGH : ORLANDO B. POTTER  
STAFF DIRECTOR

FROM : BOB COSTA/JOE STOLTZ

SUBJECT : REGISTRATION OF POLITICAL COMMITTEE

The Audit staff recently completed an audit of the West Virginia State Democratic Telethon Committee ("the Telethon Committee"). Attached is a copy of the audit report which will be forwarded to the Commission subsequent to your analysis of the matters described below. (Attachment #1). The audit report contains the opinion that the Telethon Committee is not a political committee as defined by Section 431(d) of Title 2 of the United States Code. However, during the audit, a Telethon Committee official presented for the Audit staff's review the State reports and records of the West Virginia State Democratic Executive Committee ("the Executive Committee") (Attachment #2), an unregistered committee established to conduct non-Federal activities of the Democratic Party of West Virginia.

It is the opinion of the Audit Division, based upon the review of the records of the Executive Committee as outlined below, that the Executive Committee has engaged in Federal activity which would require it to register and report with the Commission.

Registration and Reporting By a Political Committee

Section 433(a) of Title 2 of the United States Code requires each political committee which anticipates receiving contributions or making expenditures during the calendar year in an aggregate amount exceeding \$1,000 to file with the Commission a statement of organization within 10 days following the date of the anticipation.



Section 434(a) of Title 2 of the United States code requires the treasurer of a political committee to file with the Commission reports of receipts and expenditure on prescribed or approved forms.

Our review of the State reports (Attachment #2) and records of the Executive Committee revealed that during November, 1976 ten (10) transfers totaling \$3,500.00 were made to two (2) unregistered county committees and eight (8) individuals for "election day expenses". Further, during October, 1978, 106 transfers totaling \$40,900.00 were made to 55 unregistered county committees for the same purpose.

According to the official that had presented the records, the Executive Committee had sought guidance from the Commission with respect to the handling of the "election day expense", and based upon information received, attached a memoranda to each transfer check informing the recipient committees and individuals of the restricted use of the amounts transferred (Attachment 3). Documentation concerning the communication with the Commission was not retained, and the official was unable to provide further information concerning it.

The official was of the opinion that handling the transfers in the above manner would exempt the Executive Committee from coming within the jurisdiction of the Commission.

It is the opinion of the Audit staff, based upon the information presented, that the transfers had been made for Get-Out-The-Vote activities. As such, according to Advisory Opinion 1978-10, the Executive Committee would normally be required to allocate the activity between Federal and non-Federal elections on a reasonable basis. It appears reasonable that the portion allocated for Federal elections would exceed \$1,000, in an aggregate amount or value, during a calendar year. Therefore, the Executive Committee would normally be required to register and report under Sections 433 and 434.

This matter is referred to your office for a legal analysis and further guidance. Any questions concerning this matter should be communicated to Ray Lisi or Charles Hanshaw on extension 3-4155.

Attachment as stated

## Statement of Receipts and Expenditures for Candidates, Agents, Treasurers or Committees

This statement is required to be filed according to the provisions of West Virginia Code §3-8-5 not less than 5 nor more than 10 days before the date of the Election with the Secretary of State, Charleston, West Virginia, for all offices to be filled or issues to be voted upon by the voters of a political division greater than a county. For all offices to be filled or issues to be voted upon by the voters of a county or district therein, file this statement with the County Clerk. For all offices to be filled or issues to be voted upon by the voters of a city, file this statement with the City Clerk or Recorder. This statement has been prepared by James R. McCartney, Secretary of State of West Virginia, pursuant to the provisions of West Virginia Code §3-8-6.

(A)

Full Name of Candidate, Agent, Treasurer or Committee West Virginia State Democratic Executive Committee-  
Robert J. Burke, Treasurer  
 (First) (Middle Initial) (Last)

Candidate for, or Agent, Treasurer or Committee in support of the following candidate or cause Entire Democratic Ticket  
 (Office sought, or candidate or cause supported)  
State of West Virginia  
 (District or Circuit if any)

Party Affiliation (if any) Democratic

Office 2106 Kanawha Blvd., E. Mailing Address 2106 Kanawha Blvd., E.  
 (Number) (Street) (Street Address or Box Number)  
Charleston 25311 Charleston 25311  
 (Town or City) (Zip) (Town or City) (Zip)  
 Residence Telephone Business Telephone 304-342-8121

(B)

The balance of cash and any other sum of money on hand at the beginning of the period covered by this financial statement is \$ 14,391.99  
 The balance of cash and any other sum of money on hand at the end of the period covered by this financial statement is \$ 60,727.73

(C)

I hereby certify that the following is a true, complete, and itemized statement of all monies and other tangible things of value contributed or advanced by anyone, together with the full names of all such persons, firms, associations or committees who have made advances or contributions, provided that any contribution totaling more than fifty dollars (\$50.00) by any one contributor is by money order or by check.

## CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
5/1976	Harry M. Huff	\$ 20.00	10/1976	Emery L. Woodall	\$ 100.00
6/1976	James B. Spicer	10.00			
6/1976	James C. Dillon, Jr.	100.00			
8/1976	Jennings B. Holiday	50.00			
9/1976	Eugene E. Tacker	10.00			
9/1976	James E. Hemann	100.00			
9/1976	Steven D. Narick	100.00			
9/1976	Katherine Honaker	25.00			
10/1976	Anonymous (mail)	3.00			
10/1976	Delorah J. Lee	3.00			

If additional page is needed for other contributions of \$250 or less must include all of the above requested information.

TOTAL \$ 521.00



	125.00		Louis J. Abraham	
	25.00		Anthony Adams, Jr.	
	25.00		Eva Adams	
	50.00		Gerald B. Adkins	50.00
	50.00		Steve Adkins	125.00
	25.00		Joseph P. Albright	100.00
	125.00		Chester E. Alzhart	100.00
	125.00		John H. Alderson	50.00
	125.00		Clyde D. Alford	50.00
	25.00		Mary Alfred	25.00
	75.00		Burl E. Allen	75.00
	250.00		Hack Alsop	75.00

Pages needed for Fund Raising Events must include all of  
requested information.

See attached pages 2 thru 19

S/T 1,875.00  
TOTAL \$92,513.50

### FUND RAISING EVENT

#### CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EXCEED \$250 (Residence, Mailing Address, Business and Occupation must be listed)

NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
-0-	-0-	-0-	\$ -0-
Imogene W. Beckett	112 Winter Drive Ripley, W. Va.	House Wife	275.00
Richard E. Crain	11 Fort Clark Estates Benwood, W. Va.	Printer	475.00
Bernard L. Crawford	1500 Harper Road Beckley, W. Va.	Automobile Salesman	375.00
John C. Cruikshank	Ivydale, W. Va.	Merchant	650.00
Paul S. Flack	4451 Kitridge Rd. Dayton, Ohio	Building Contractor	300.00
Lucian Fry	P.O. Box 187 East Lynn, W. Va.	Banker	975.00
W. Goode Gess	Bunker Hill, W. Va.	Merchant	450.00
R. William Hancock	P.O. Box 927 Morgantown, W. Va.	Heavy Equipment Dealer	375.00

Pages needed for Fund Raising Events must include all of  
requested information.

See attached one page

S/T 3,875.00  
TOTAL \$12,610.00

(E)

My that all contributions received during the period covered by this financial statement have  
been reported above in Section C or Section D or both, and that the total amount of all such contributions

01.12



CONTRIBUTOR (Full, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
Wm. D. Rockefeller IV	1515 Barberry Lane Charleston, W. Va.	Businessman	\$ 1,000.00
Robert C. Myers	Morritts Ck. Huntington, W. Va.	Nurseryman	1,000.00
Canfield-Miller Assocs.	1007 Bridge Road Charleston, W. Va.	Public Relations	440.62
Alan L. Susman	P.O. Box 1005 Beckley, W. Va.	Banker and Farmer	500.00
TOTAL			\$ 2,540.62

Additional pages needed for other contributions exceeding \$250 must include all of the above requested information.

(D)

I hereby certify that the following is a true, complete, and itemized statement of every FUND RAISING EVENT held during the period covered by this financial statement. A FUND RAISING EVENT means any event such as a dinner, reception, testimonial, cocktail party, auction or similar affair through which contributions are solicited or received by such means as purchase of a ticket, payment of an attendance fee or through purchase of goods and services.

#### FUND RAISING EVENTS

Date of Event	August 14, 1976	Date of Event	
Type of Event	Reception-Dinner and Dance	Type of Event	
Address of Place Held	Reynolds Street Charleston, W. Va.	Address of Place Held	
Name of Place Held	Beni Kedem Temple and Charleston Civic Center	Name of Place Held	
Total Expenditures	\$ 35,142.02	Total Expenditures	\$
Net Receipts	\$ 105,323.50	Net Receipts	\$

Date of Event		Date of Event	
Type of Event		Type of Event	
Address of Place Held		Address of Place Held	
Name of Place Held		Name of Place Held	
Total Expenditures	\$	Total Expenditures	\$
Net Receipts	\$	Net Receipts	\$

Any additional pages needed for Fund Raising Events must include all of the above requested information.

# CONFIDENTIAL

THE FOLLOWING IS A LIST OF CONTRIBUTORS TO THE CAMPAIGN OF 1976  
(Name, Home Address, Business and Occupation must be listed)

DATE OF CONTRIBUTION	NAME OF CONTRIBUTOR (Last, M. I., First)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
August 14, 1976	David G. Hanlon	Harrisville	Attorney	\$ 325.00
	Robert F. Hatfield	Rt. 1, Box 213 Hurricane, W.Va.	Businessman	275.00
	Robert E. Holroyd	1438 Main St. Princeton, W.Va.	Attorney	350.00
	A. Wayne King	Valley Fork, W.Va. (Clay Co.)	Attorney	350.00
	David L. Lambert	185 Bethel Road Centerville, Ohio	Contractor	300.00
	Lois L. Lambert	1425 Big Hill Rd. Dayton, Ohio	Housewife	400.00
	Marion Co. Democratic Executive Committee	313 Professional Bldg. Fairmont, W. Va.		600.00
	Ralph F. Lepore	22 Hamilton Ave. Wheeling, W. Va.	Investigator	500.00
	Robert A. Mazzella	P.O. Box 655	Restaurant Owner	275.00
	Jack R. Murray	2305 23rd St. Parkersburg, W.Va.	Murray Sheet Metal Co.-Manufacturer	300.00
	John Protan (NMI)	Sylvester, W. Va.	County Official	325.00
	Ervin S. Queen	Box 810 Logan, West Virginia	Businessman	500.00
	Arch H. Riley	Suite 200, Riley Bldg. Wheeling, W. Va.	Attorney	500.00
	William Z. Schwadron	Box 432 Charles Town, W.Va.	Manager Race Track	300.00
	Mrs. McDonald Smith, Jr.	2419 McKinley Ave. St. Albans, W. Va.	Housewife	625.00
	Wylie Stowers (NMI)	Rt. 1, Box 126 West Hamlin, W.Va.	Drilling Contractor	500.00
	Bernard O. Tice	Rt. 3 St. Marys, W. Va.	Building Contractor	275.00
	United Transportation Union	West Logan, W.Va.		375.00
	Berkeley Co. Democ. Executive Committee	Bunker Hill, W. Va.		475.00
	Eabel Vandelinde	P.O. Box 47 Hamlin, W. Va.	Housewife	285.00
	Jacqueline P. Withrow	310 Spring St. Ripley, W.Va.	Secretary	350.00
	Proceeds from sale of refreshments at dance			750.00

8/14/76

Name	Amount	Name	Amount
Frederick/Altizer	6.00	Mrs. Marvin K. Ash	12.00
C. Harold Amick	50.00	John D. Amos	125.00
Peter Anania	200.00	Alva Anderson	25.00
Elbert Anderson	25.00	I. Braxton Anderson	50.00
John A. Anderson	100.00	John P. Anderson	125.00
Millie Anderson	25.00	Opal H. Anderson	75.00
Sam J. Angotti	125.00	Hunter Armentrout	50.00
Doris T. Armstead	25.00	George E. Arnold	250.00
James s. arnold	25.00	William J. Artrip	125.00
Nick Arvon	25.00	Brooks Ash	175.00
Francis A. Atkins	75.00	Jan Atkins	25.00
Sallie Atkins	25.00	Robert S. Atlee	25.00
Jim L. Ayres	125.00	Frank A. Baer, II	125.00
Robert Bailey, Jr.	100.00	Curil Bailey	50.00
Eunice Bailey	137.00	Gene W. Bailey	50.00
Gloria <sup>3</sup> / <sub>4</sub> Bailey	250.00	Jewell <sup>R</sup> / <sub>4</sub> Bailey	250.00
Larrie Bailey	75.00	Troy S. Bailey	25.00
William C. Bailey, Jr.	25.00	Betty H. Baker	50.00
Jack A. Baldini	100.00	Margaret J. Baldwin	50.00
Dale E. Ball	50.00	Mrs. James E. Ball	50.00
John W. Ball, Jr.	31.00	Smokey Ball	125.00
Yvonne J. Ballard	50.00	Katherine Banks	102.00
Icic Barbe	25.00	Clifford E. Bargeloh	25.00
Ida Lee Barger	25.00	Lawrence W. Barker	250.00
Stonie Barker, Jr.	100.00	Norma C. Barley	125.00
David A. Barnette	25.00	Mary Ann Barrows	25.00
Arthur Barthelmess	50.00	Paul C. Bartlett	25.00
Sanford J. Barton	125.00	Robert Basil	25.00
Dominick Basile	100.00	Clement R. Bassett	50.00
George Baughman	50.00	Faustine Bauman	125.00
John W. Bays	150.00	Russell G. Beall	250.00
Worth C. Beall	125.00	Coy B. Beckett	50.00
Joel E. Bedell, III	25.00	James E. Belcher	50.00
Robert <sup>5</sup> / <sub>2</sub> Belcher	125.00	Clyde Bell	25.00

UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

DATE	NAME OF DONOR (Last, First, Middle)	AMOUNT	NAME OF DONOR (Last, First, Middle)	AMOUNT
8/16/76	Victor A. Barone	\$100.00	Hunter Bennett	\$ 25.00
	Paul L. Bennett	25.00	D. Michael Bequette	25.00
	Estil <sup>L.</sup> /Bevins	125.00	Henry C. Bias, Jr.	50.00
	Columbia Bickel	75.00	George A. Biggs	50.00
	L. Billow	25.00	William P. Bittinger	125.00
	Nancy L. Black	50.00	Thomas L. Black	100.00
	James R. Blake	75.00	Paul M. Blake, Jr.	25.00
	J. E. Bleckley, Jr.	103.00	Everett Bledsoe	250.00
	June Bledsoe	175.00	James E. Blevins	20.00
	Nellie R. Blevins	25.00	Roy M. Blizzard, Jr.	125.00
	Betty S. Blessner	25.00	Catherine Bobersky	12.50
	C. Thomas Bobbitt	125.00	William C. Bockway	25.00
	Abel Boggs	25.00	Ralph Bohannon	125.00
	Amos A. Bolen	100.00	Louis Bonasso	50.00
	Landers P. Bonenberger	125.00	Harry L. Boord	50.00
	Alex E. Booth	100.00	Aunita <sup>H.</sup> /Booth	125.00
	C. Dennis Booth	50.00	Hobart Booth, Jr.	125.00
	Dixie L. Booton	50.00	William A. Boram	25.00
	Frances <sup>M.</sup> /Bosley	31.00	Hugh H. Bosely	100.00
	Mat D. Bouldin	25.00	John M. Bowers	25.00
	J. Patrick Bower	50.00	Robert R. Bowers	125.00
	Clyde L. Bowling	25.00	Richard H. Bowman	125.00
	George J. Boyles	25.00	Wilma Hazel Boyles	25.00
	James M. Bradley, Jr.	25.00	Sarah Bragg	50.00
	Curtis Brannon	25.00	Harry <sup>H.</sup> /Brawley	50.00
	Robert A. Broce	50.00	Harry L. Broh	125.00
	Wade H. Bronson	125.00	James R. Brotherton	50.00
	Wm. T. Brotherton, Jr.	125.00	Mary Brown	25.00
	Ralph N. Brown	75.00	Walter R. Brown	25.00
	Pat Browning	12.00	Chauncey H. Browning	125.00
	Robert Browning	25.00	Simon M. Bright	125.00
	Margaret Bruffey	50.00	Butch <sup>E.</sup> /Bryan	250.00
	Don Bryant	25.00	Reddie Bryant	50.00
	George Beharrah	25.00	Thomas E. Bugardner	125.00
	David Bunn	75.00	G. Richard Bunner	25.00



201. CONTRIBUTION TO WAREHOUSE RECONSTRUCTION CONTINUATIONS FROM 8/14/76

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
8/14/76	William E. Burchett	\$ 125.00		Rex Burford	\$ 125.00
	Kenneth R. Burdette (Mrs.)	25.00		Margaret Burdette	250.00
	Robert <sup>L.</sup> Burford	250.00		Harold D. Burgess	50.00
	Billy B. Burke	225.00		Robert <sup>J.</sup> Burke	125.00
	George <sup>G.</sup> Burnette, Jr.	125.00		Cary L. Burns	25.00
	Jeanne Burton	50.00		John <sup>W.</sup> Burton	125.00
	Ronzel H. Burton	50.00		Elaine S. Bush	75.00
	Evelyn Buster	62.00		Robert C. Byrd	50.00
	James Cain	50.00		James F. Cain	25.00
	Lily W. Cain	25.00		Charles P. Caldwell	25.00
	Clarence E. Caldwell	25.00		Calhoun Co. Exe. Comm.	200.00
	David C. Callaghan	125.00		Dan S. Campaign	50.00
	Evelyn S. Campbell	25.00		Leonard R. Campbell	75.00
	Newton W. Campbell	25.00		Harry <sup>G.</sup> Camper	100.00
	John <sup>A.</sup> Canfield	125.00		W. Gaston Caperton, III	100.00
	Betty Caplan	50.00		Howard Caplan	25.00
	John S. Caplinger	125.00		David M. Cardwell	25.00
	George E. Carenbauer	50.00		Anita Sue Carman	25.00
	Chapin Carpenter, Jr.	25.00		O. F. Carroll, Jr.	125.00
	Reba Norris Carroll	250.00		Noka J. Carter	125.00
	Anthony Casella	100.00		Patrick Casey	12.00
	Sylvia Castle	50.00		Homer G. Cassidy, Jr.	100.00
	Peter Cassella	125.00		John <sup>E.</sup> Casto	25.00
	Max Casto	175.00		Russell W. Casto, III	75.00
	Joseph E. Caudle	25.00		John A. Cavacini, Jr.	125.00
	Gerald L. Chafin	225.00		Edna Channell	75.00
	Samuel W. Channell	100.00		Robert L. Childers	100.00
	Jack V. Christie	100.00		John Chuchiak, Jr.	100.00
	Forrest Clark	250.00		Danny O. Cline	125.00
	Harry J. Cline	50.00		Bernard Codispodi	25.00
	Leonard Codispodi	25.00		Charles C. Coffman	25.00
	Charles <sup>C.</sup> Coffman	25.00		O. R. Colan	125.00
	Albert E. Cole	25.00		Oncal Combs	150.00
	Edna B. Comer	50.00		Joseph Cometti	50.00
	Joseph Marion Compton	75.00		Frank R. Conrad	100.00

8/14/76	Jospeh P. Condry	\$ 50.00		Carmine Cann	\$ 100.00
	Donald H. Cookman	50.00		Carl Cooley	25.00
	John A. Convery	25.00		Edwin Don Cook	50.00
	Kermit M. Coon	12.50		John W. Cooper	25.00
	Charles D. Corman	50.00		Marcel Q. Coronel	50.00
	Mamie Cottle	25.00		Margaret A. Counts	25.00
	F. Layton Cottrill, Jr.	50.00		Reka B. Cottrill	25.00
	Samuel C. Courtney	125.00		Bertram B. Cousins, Jr.	25.00
	Edward C. Cousins	25.00		James <sup>F</sup> /Cox	25.00
	Janet Sue Cozart	25.00		Paul L. Crabtree	125.00
	Blanche E. Craig	5.00		Robert A. Crawford, Jr.	100.00
	Betty Dorsey Crookshanks	131.00		Mrs. Glen Crouse	10.00
	M. Homer Cummings, Jr.	125.00		Burnadine Currence	25.00
	Bonnie Blessing Currey	25.00		Dale Curry	125.00
	David M. Cutlip	50.00		James Copola	25.00
	Sam D'Annunzio	100.00		Stanley E. Dadisman	125.00
	John Daffin	25.00		Carl R. Daniel, Jr.	100.00
	Elmer L. Davis	50.00		John L. Davis	25.00
	James H. Davis, III	100.00		Wm. Maxwell Davis	125.00
	Gloria V. Davoli	175.00		Dama C. Dechow	31.00
	Jack R. Delligatti	100.00		Bryan C. Deem	50.00
	Patrick D. Deem	25.00		J. Raymond DePaulo	125.00
	Anthony DeSantis	75.00		Joan E. Demus	25.00
	Charlene Digmon	25.00		David L. Dickinson	125.00
	James C. Dillon, Jr.	250.00		Fred <sup>L</sup> /Dillon	75.00
	Louise Dingess	25.00		Margaret <sup>C</sup> /Dillon	250.00
	Chester Dobbins	125.00		Willie Dingess	25.00
	William L. Dodd, Jr.	125.00		Ben C. Dobkin	100.00
	Virginia Dodrill	50.00		Virginia Dodrill	50.00
	Grant E. Donohew	50.00		Mike Dolin	25.00
	Albert Donahue	25.00		Virginia <sup>L</sup> /Donovan	25.00
	Anos Doss	125.00		Reba Donahue	25.00
	Ron Doten	25.00		Barbara Doten	25.00
	Lon <sup>H</sup> /Dow	100.00		Gus R. Douglass	125.00
				Mary Gallagher Doyle	10.00



DATE OF CHECK	NAME OF CONTRIBUTOR (Print, in full)	AMOUNT	DATE OF CHECK	NAME OF CONTRIBUTOR (Print, in full)	AMOUNT
8/14/76	Leonard G. Drain	\$ 75.00		Evelyn M. Dancil	\$ 25.00
	Kenneth M. Dunn	125.00		Rudolph P. Duranti, Jr.	25.00
	Frederick Durst	25.00		Betty L. Dye	250.00
	Newman H. Dyer	100.00		Maxine Earl	25.00
	R. D. (Pete) Earle	125.00		Richard Earles	25.00
	Hettie C. Earp	25.00		Jess W. Easley Jr.	25.00
	Horton Eckard	25.00		Margarita M. Eckhart	25.00
	Robert C. Edwards	125.00		Anna J. Ehman	12.00
	Jane K. Eib	50.00		Ray Elkins	50.00
	James W. Ellars	25.00		Maywood C. Ellifritt	125.00
	Dean Elliott	50.00		Lee Ellis	100.00
	Lucille Ellis	25.00		Robert V. Ellis	125.00
	Sam Ellis	25.00		Frank M. Ellison	125.00
	C. Douglas Epperly	50.00		Romeo D. Erdie	150.00
	Joseph Eros, Jr.	125.00		Guy F. Escue	75.00
	James Esteppe	125.00		Swanzzy L. Evans	125.00
	Swanzzy L. Evans	50.00		Donald Evans	125.00
	Diana Everett	225.00		Facemire Brothers & Co.	250.00
	Douglas Facemire	125.00		Eugene Facemire(Sutton)	250.00
	Eugene Facemire (Chas)	125.00		John Daniel Facemire	125.00
	Albert H. Falvo, Sr.	150.00		Ralph A. Fandree	50.00
	George E. Farley	50.00		Nelson N. Farley	50.00
	John Fedley	25.00		Clyde L. Ferguson	50.00
	C. T. Ferguson	100.00		Sylvia R. Ferguson	50.00
	Clement L. Schulte	125.00		Maxine Fields	25.00
	Blaine Pike	25.00		James W. Finley	125.00
	James <sup>W.</sup> Finley	125.00		Rebecca I. Finley	25.00
	Gertrude V. Firth	25.00		William T. Flanagan	50.00
	Irene D. Fleck	25.00		Agnes Irene Flowers	25.00
	Carolyn Fluharty	225.00		Bernard <sup>W.</sup> Folio	125.00
	Richard H. Ford	125.00		Matt <sup>J.</sup> /Foreman	250.00
	Melorus S. Foster	50.00		Norma Fought	25.00
	Fred L. Fox, II	25.00		H. L. Frankel	25.00
	Mike Franklin	125.00		Mrs. Charles Frazier	42.00
	Charles E. Fox	125.00		Mrs. Charles W. Frazier, Jr.	125.00

CONTRIBUTORS WHOSE ADDRESSES CONTRIBUTIONS COULD NOT BE OBTAINED

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
8/14/76	John Frazier	\$ 25.00		Grace Freshour	\$ 25.00
	Robert W. Friend	125.00		Jack Fruith	25.00
	O'Dell Frye	25.00		Albert A. Fullen	125.00
	Thorold S. Funk	125.00		Mrs. Willis H. Gaine	25.00
	Carl E. Gainer	50.00		Mrs. Denzil L. Gainer	125.00
	Genevieve Gainer	25.00		Glen B. Gainer, Jr.	150.00
	Edward Gallagher, Jr.	25.00		Okay B. Gandee	25.00
	Mary Lou Gardner	25.00		Joseph R. Garrett	50.00
	Mrs. L. Earl Garrett	25.00		Robert E. Garrett	50.00
	Phyllis Gatsen	6.00		Hercil H. Gartin	125.00
	Lyllias H. Gay	125.00		Gary W. Gibson	12.50
	Fredric J. George	50.00		Nick A. George	25.00
	Lawrence Gerlach, Sr.	25.00		Agnes/Gessel	31.00
	Louise Gibbs	25.00		Jack H. Gibson	50.00
	M. Scott Gibson	25.00		Nettie L. Gidley	25.00
	Ernest H. Gilbert	125.00		Walter Gilbertson	25.00
	John A. Giles	100.00		Betty Gill	25.00
	Charles Gilliam	175.00		George W. Gilliam	25.00
	Gilmer Co. Dem. Comm.	150.00		Robert J. Gilmore	25.00
	Alexander S. Giltinan	125.00		June Gladwell	250.00
	Robert Glick	50.00		W. R. (Bob) Goe	100.00
	Mary Goff	25.00		Mary S. Goff	50.00
	Robert E. Goff	125.00		Betty Goforth	50.00
	Alex Goldberg	125.00		Vanel Golden	25.00
	Rebecca B. Goldman	125.00		Newman M. Goldston	50.00
	Claude E. Goodwin	125.00		Ellen G. Goodwin	125.00
	Daniel Gordon	75.00		John E. Gorrell	100.00
	Bernard Gottlieb	125.00		Howard S. Graham	200.00
	Everette H. Graley	25.00		Dean Gravelich	125.00
	Carroll Greene	50.00		Claud E. Greene	50.00
	John E. Greene	25.00		Donald E. Gregory	100.00
	Charles E. Gribble	50.00		Keith E. Griffith, Sr.	150.00
	Hazel Edna Grinnett	6.00		Garmon W. Grinnett	50.00
	Ralph Grinnett	125.00		Carolyn Grove	25.00
	Howard R. Guest	50.00		Mrs. Bryan Gruver	250.00

CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$100 OR LESS

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
8/14/76	Jan Douglas Hacher	12.50		Josephine J. Hach	25.00
	Sammy G. Haddad	25.00		Lawrence J. Haggerty	50.00
	Stephen Haid	100.00		Cullen G. Hall	125.00
	James Hall	25.00		Thelma N. Hall	6.00
	William R. Hall	25.00		Charles Halsey	37.00
	Mariam A. Hamblin	25.00		Pat R. Hamilton	100.00
	Walter D. Hammer	25.00		Barbara Hamon	25.00
	C. Page Hamrick, III	181.00		C. Page Hamrick, Jr.	125.00
	Chuck Hamshere	25.00		Fred L. Hanna	25.00
	Leonard B. Hanger	50.00		Beatrice Harbour	50.00
	James J. Haranzo	125.00		Richard E. Hardison	50.00
	Edwin D. Harley	25.00		John C. Harman	74.00
	Betty Jo Harris	50.00		Corlis W. Harris	125.00
	Odessa Dodd Harris	25.00		R. S. Harris	25.00
	Brenda C. Harrod	125.00		Sam R. Harshbarger	100.00
	George Hartman	50.00		I. Frank Hartman, M.D.	50.00
	Henrietta Hartman	150.00		Beatrice Burns Harvey	125.00
	Robert B. Harvit	100.00		Boyd Hash	125.00
	Boyd A. Hash	125.00		Morris E. Haskins	25.00
	Burma Hatfield	50.00		Evelyn Hatfield	250.00
	Ed Con Haught	100.00		Bonnie B. Hawkins	50.00
	Thomas J. Hawse	25.00		Allegheny Political Action Committee	50.00
	James R. Hayes	25.00		Bernard R. Hays	125.00
	William H. Hazlett	125.00		Ken Hechler	200.00
	Charles A. Heck	100.00		Homer Heck	25.00
	Janet S. Heck	75.00		Pam Heck	25.00
	G. Foster Hedges, Jr.	125.00		Mrs. Robert E. Hedrick	100.00
	Wallace Hefner	25.00		William E. Held	6.00
	R. Page Henley, Jr.	125.00		Margaret Hensley	25.00
	Robert Hensley	50.00		Luella M. Henson	25.00
	Brenda Herold	25.00		Hazel Herald	25.00
	Marguerite G. Hess	30.00		Wendell Lester	25.00
	William D. Highland	50.00		George E. Hill, Jr.	100.00
	George H. Hill, Jr.	25.00		Kenneth Hill	25.00

MEMBERSHIP LIST - 1970

NAME	ADDRESS	AGE	SEX	DATE OF BIRTH	DATE OF DEATH
8/14/70	Lorna Hill	25.00		Michael Hill	125.00
Mary Susan Hilleary	25.00	Phillip Hinerman	25.00		
Phyllis Jean Hite	50.00	Bruce <sup>5</sup> /Hobbs	125.00		
Jack <sup>R</sup> /Hobbs	50.00	Herbert R. Hobday	5.00		
E. Leslie Hoffman, III	25.00	Walter A. Holden	100.00		
Barbara K. Holmes	125.00	Darrell E. Holmes	25.00		
Steve Holmes	50.00	Morris M. Homan	225.00		
Blanche C. Hoover	125.00	Garnet B. Hoover	10.00		
James B. Hoover	25.00	Charles S. Hornor, Jr.	50.00		
William M. Houchins	125.00	Ralph Houlton	25.00		
Charles B. Howard	50.00	Rose M. Howard	25.00		
John E. Howell	100.00	Robert P. Howell	25.00		
Eugene <sup>R</sup> /Hoyer	250.00	Thom B. Huddleston	125.00		
Robert P. Hudson	75.00	Harry M. Huff	75.00		
Steven M. Huff	125.00	Wanda J. Huff	25.00		
Diana L. Huffman	25.00	Jack D. Huffman	50.00		
Kathleen Huffman	25.00	Odell H. Huffman	50.00		
Mrs. Ronald <sup>S</sup> /Huffman	125.00	Ronald <sup>S</sup> /Huffman	100.00		
Freda <sup>V</sup> /Hunt	25.00	Clara A. Hunt	50.00		
Bill Hurley	25.00	John J. Hutchinson	25.00		
Julia T. Hutchinson	12.00	Paul <sup>R</sup> /Hutchinson	175.00		
Thomas A. Hutto	125.00	Tracey <sup>W</sup> /Hylton	125.00		
P. Scott Icard	25.00	Galena Iddings	75.00		
Charles L. Ihlenfeld	125.00	Gordon <sup>T</sup> /Ikner, Jr.	50.00		
Russell L. Isaacs	125.00	Robert A. Isner	50.00		
Robert <sup>V</sup> /Jackson	25.00	William L. Jacobs	50.00		
A. Athar Jalil	12.50	Bianca M. James	18.00		
Charles H. James II	125.00	Donald H. James	25.00		
Joseph C. Janco	125.00	Howard E. Janney	25.00		
Melvin C. Jarrell	50.00	Jessie Jenkins	50.00		
Rudolph D. Jennings	25.00	Fred A. Jesser, III	25.00		
O'Dell Jessup	25.00	Debbie A. Johnson	50.00		
E. M. (Pete) Johnson	125.00	Evelyn Johnson	100.00		
George W. Johnson	150.00	Nicholas W. Johnson	50.00		
Eady A. Johnson	50.00	Robert F. Johnson	100.00		



Donations for the 1975-1976 Year

DATE	NAME OF DONOR (Last, First, Middle)	AMOUNT	DATE	NAME OF DONOR (Last, First, Middle)	AMOUNT
8/15/75	Adelyn Jones	\$ 100.00		Charles E. Jones	\$ 50.00
	Charles T. Jones	200.00		E. Forest Jones	75.00
	Karen B. Jones	100.00		Reverdy H. Jones, III	25.00
	Robert H. Jones	50.00		Roy H. Jones	25.00
	A. Dana Kahle	75.00		Jane W. Kahle	100.00
	Melvin W. Kahle, Jr.	250.00		Gabriel Kalopit	25.00
	Norris Kantor	125.00		Marianne Kapinos	25.00
	John Z. Karantonis	100.00		James F. Karinshak	25.00
	Charles I. Karnes	50.00		T. D. Kauffelt	25.00
	James N. Keen	50.00		Russell T. Keith, Jr.	125.00
	William L. Keller	50.00		Earl K. Kelley	125.00
	George D. Kemper	74.00		Woodlyn Kendrick	50.00
	Mrs. Lee M. Kenna	125.00		Loretta Faye Kennedy	100.00
	Neil H. Kennedy	25.00		Harold L. Kerns	125.00
	Gary E. Keys	25.00		Marie Kidd	50.00
	Raymond N. Kidd	25.00		Vaughn L. Kiger	25.00
	Dixie D. Kilham	250.00		Harry Kilmer	50.00
	Hugh A. Kincaid	100.00		Earl H. Kinder	50.00
	Kendrick King	25.00		O. R. Kinsey	125.00
	Matthew M. Kinsolving	25.00		Brown A. King	50.00
	Charles B. King	125.00		Clinton D. Kirk	25.00
	Mrs. Ray W. Kirkwood	75.00		Elizabeth L. Kisner	50.00
	Ruby Gem Kitchen	25.00		Sue H. Kitching	50.00
	David Kitsmiller	25.00		Roy E. Klaproth	100.00
	Lemoine J. Klug	25.00		Clarence W. Knapp, Jr.	25.00
	Miriam W. Knight	50.00		Eugene A. Knotts	50.00
	Jeff Knotts	25.00		Kenneth G. Koch	50.00
	C. Ray Kohlhepp, Sr.	200.00		Brenda Krauklis	25.00
	John A. Krumholtz, Jr.	50.00		Clovis D. Kuhn	25.00
	Mrs. C. R. Lacy	75.00		Gerald R. Lacy	50.00
	Gay Lang	50.00		Virginia Lang	25.00
	Gaylord Lankham	125.00		Clifford Lantz	125.00
	George H. Lantz	25.00		Dana Lawson	25.00
	James D. LaRosa	100.00		Harold Largent	25.00
	Nancy Largent	25.00		Frank T. Lawson	50.00

NAME		AMOUNT	
8/14/76	Diana Layne	6.00	Mrs. Thomas Leach's 247.00
	Louise N. Legg	50.00	Don Lemley 25.00
	William E. Lemon	75.00	Arthur E. Lewis 25.00
	C. Cameron Lewis	225.00	Charles C. Lewis, Jr. 125.00
	Charles S. Lewis, Jr.	225.00	Lewis Co. Dem. Exec. Co. 100.00
	Ralph C. Lewis	50.00	Benjamin Lieberman 100.00
	Karl C. Lilly	50.00	Anne D. Little 75.00
	John A. Little	25.00	Sadie V. Littleton 31.00
	Bernard R. Lively	25.00	Don P. Lively, 25.00
	Jack Lloyd	125.00	Charles M. Lobban 125.00
	Charles E. Lohr	125.00	Regina A. Lohr 50.00
	Harold V. Long	100.00	Louis E. Longanacre 25.00
	Frank Looman	25.00	Sandra W. Lopinsky 125.00
	Larry E. Losch	25.00	Charles M. Love 125.00
	Charles M. Love, III	125.00	Chester Lovett 125.00
	Bob Lowery	25.00	Mark Lowery 25.00
	Kathryn/Lucas	25.00	Elizabeth P. Lupardus 190.00
	Ben Lusk	100.00	Paul F. Lutz 50.00
	Robert E. Lynch, Jr.	100.00	John W. Lyon 100.00
	Larry B. Lyon, Jr.	50.00	Ann/Lytle 25.00
	Sam/MacCorkle	125.00	Vernon Mace 25.00
	M. K. Macpherson	25.00	Harold H. Madison 25.00
	Robert E. Magnuson	125.00	Eugene L. Mahoney 50.00
	John J. Malone	25.00	Melton E. Maloney 25.00
	George L. Malott	100.00	A. James Manchin 125.00
	Joseph H. Manypenny	125.00	Dora F. Marcum 25.00
	Stanley F. Margolis	125.00	Nat S. Marino 25.00
	Johnny O. Marko	25.00	Michael James Marlowe 25.00
	Mildred Marlowe	25.00	Joe Marozzi 50.00
	Clairbel L. Marshall	50.00	Marshall Co. Dem. 25.00
	Don A. Marshall	125.00	Sam Marsico 125.00
	Clarence E. Martin, III	25.00	Rose G. Martin 50.00
	William R. Martin	50.00	Dorothy Maruish 50.00
			Marvin W. Masters 50.00



MEMORANDUM FOR THE RECORDS OF THE BOARD OF DIRECTORS OF THE UNIVERSITY OF MICHIGAN

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M.I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M.I., Last)	AMOUNT
8/14/76	Jean Matthews	25.00		Nick Mason	25.00
	Edmund J. Matko	50.00		Gail Matthew	25.00
	Ronald E. Mastrogiuseppe	25.00		Virgil E. Matthews	50.00
	Ann Maxwell	100.00		William B. Maxwell, III	100.00
	Timothy J. May	25.00		Silvester <sup>C</sup> /Mazzella	100.00
	Paul B. McCallister	25.00		Daniel L. McCarthy	25.00
	Vincent McCauley	50.00		Jewel F. McClanahan	125.00
	Charles E. McClintic	25.00		Ira <sup>G</sup> /McCoy	125.00
	Denver Mathis	25.00		James W. McCloud	50.00
	Jack C. McClung	25.00		Mary E. McComas	50.00
	Ira McCoy	125.00		Joseph W. McCoy	50.00
	Virgil McCoy	50.00		Michael McCracken	25.00
	Thomas <sup>6</sup> /McCulloch	25.00		F. Witcher/McCullough	100.00
	Carter McDavid	50.00		Jeffrey O. McGeary	125.00
	Mary Eleanor McGee	50.00		James H. McGee	25.00
	Ruth McGill	68.00		Eleanor McGrady	25.00
	Ruth McGraw	40.00		Charles C. McGuire	25.00
	Elizabeth F. McKinstry	25.00		C. H. McKown (Jackie)	125.00
	Alice McLaughlin	50.00		James Kemp McLaughlin	175.00
	Durward N. McMillion	50.00		Julia McNeer	50.00
	Belva McVey	100.00		Howard R. McWorter	25.00
	H. R. McWhorter	100.00		Lucille S. Meadows	51.00
	Charles M. Medford, III	25.00		Ernest W. Mellow	75.00
	Henry E. Melton, Jr.	50.00		Minnie R. Mentzer	75.00
	J. Harper Meredith	25.00		Mrs. Charles Merritt	50.00
	Barbara Meyer	25.00		Martin Metz	50.00
	Charles A. Meyer	100.00		Joe C. Midkiff	50.00
	Pat Miklas	50.00		Alan R. Miller	35.00
	Arnold R. Miller	100.00		Emory R. Miller	50.00
	H. Edward Miller	125.00		James F. Miller	50.00
	Joe E. Miller	125.00		John L. Miller	25.00
	Kenneth R. Miller	100.00		Myra L. Miller	125.00
	Raymond D. Miller	50.00		Robert F. Miller	125.00
	Richard L. Miller	100.00		Thomas R. Miller	125.00
	William C. Miller	125.00		William T. Milleson	50.00
	Barbara Mills	25.00		George A. Mills, III	125.00

MEMORANDUM FOR THE RECORD: DONATIONS TO THE AMERICAN RED CROSS - 1946

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
9/14/76	Edith N. Mills	100.00		Okey Mills	125.00
	Lofton M. Milstead, Jr.	125.00		George H. Mitchell	50.00
	James <sup>M</sup> /Moler	25.00		Robert H. Mollohan	125.00
	Monon. Co. Dem. Women's Club	25.00		Joseph H. Mancypenny	125.00
	James C. Moon	250.00		Avis <sup>S</sup> /Moore	225.00
	James H. Morgan, Jr.	125.00		John G. Morgan	25.00
	Keith E. Morgan	50.00		Stanis Morton	50.00
	Marcie L. Moore	25.00		Clarence <sup>E</sup> /Moran	125.00
	William A. Moreland	50.00		Henry W. Morrow, Jr.	125.00
	Gloria F. Morris	25.00		K. D. Morris	125.00
	Pearle C. Morris	25.00		Walter T. Morris	50.00
	James Herold Morton	25.00		Larry J. Morton	12.50
	Paul Morton	100.00		William E. Morton	200.00
	James <sup>J</sup> /Mosby	50.00		M. Thurmond Moss	125.00
	R. D. Moten	125.00		Thomas O. Mucklow	50.00
	Audrey B. Mudd	25.00		Robert J. Mulroy	100.00
	Nora Murdock	25.00		Anna Mae Murphy	125.00
	Jack R. Murray	75.00		Frank Musci	25.00
	Marion S. Muselli	125.00		Andy Myers	125.00
	Jean E. Myers	50.00		Thomas E. Myles	25.00
	Yolanda L. Napple	100.00		Sarah Lee Neal	151.00
	Carrie M. Neely	25.00		Robert B. Neely	25.00
	George E. Neville	125.00		Irene C. Newsome	125.00
	<sup>Mrs.</sup> Garland B. Nibert, Sr.	225.00		Carl M. Nicholas	50.00
	Thelma Njaka	25.00		Rick Norris	25.00
	Gerald W. Nottingham	50.00		Jack R. Nuzum	50.00
	Marjorie R. Oakley	125.00		Mary O'Brien	50.00
	William O'Brien	25.00		David O'Neal	200.00
	Alva W. Olander	125.00		Arthur <sup>H</sup> /Ostrin	125.00
	Rebecca L. Ours	250.00		Hazel Owens	125.00
	Kelly L. Castleberry	250.00		Mrs. Lenora Castleberry	250.00

MEMORANDUM FOR THE RECORD

NAME		AMOUNT		NAME		AMOUNT	
NAME		AMOUNT		NAME		AMOUNT	
8/14/16	Averil L. Ramsey	\$	125.00	Brady F. Randolph	\$	50.00	
	J. Louis Pais		25.00	Mario J. Palumbo		50.00	
	Debbie Panashy		25.00	Raymond P. Park		100.00	
	Frederick L. Parker		150.00	Paul E. Parker, Jr.		50.00	
	Deborah L. Parks		125.00	Thomas R. Parks		50.00	
	John W. Parr, Mrs.		25.00	James F. Parsons		25.00	
	Kenny E. Partlow		25.00	Robert Partlow		50.00	
	Okey, Patteson		175.00	Freda N. Paul		125.00	
	Perry, Pauley, Jr.		25.00	John F. Payne		250.00	
	Linda L. Payton		25.00	Mrs. Eva. Pence		25.00	
	Beverly Penhale		100.00	Emma Lou Pennington		25.00	
	Kenneth R. Pennington		50.00	Johnny D. Perdue		25.00	
	Guy W. Perkins		50.00	Lois C. Perkins		25.00	
	J. Carter Perkins		50.00	Noah E. Perry		25.00	
	Robert, Person		125.00	Charles G. Peters (Mrs.)		62.50	
	Rose Phares		25.00	George Phares		50.00	
	David L. Pethtel		25.00	John P. Philbin		50.00	
	Philipp K. Petry		25.00	Phillip, Benny		125.00	
	Avis Phillips		25.00	Deborah F. Phillips		50.00	
	Mary B. Phillips		25.00	Leo J. Pilewski		100.00	
	Mary L. Pinchart		25.00	Abraham Pinsky		50.00	
	Richard S. Pizatella		50.00	Charles M. Polan, Jr.		125.00	
	Lake, Polan, Jr.		125.00	Mararette Polk		25.00	
	Robert, Pollitt		50.00	Joel A. Potts III		25.00	
	Jo Ann Powell		24.00	Robert W. Powell		125.00	
	William I. Powell		250.00	Frank, Powers		125.00	
	Francis X. Powers		125.00	Ruth F. Prante		31.00	
	Edgar C. Pratt		50.00	William, Preston		50.00	
	Bromley B. Price		75.00	Frances E. Price		25.00	
	John H. Price		125.00	Carl F. Prickett		25.00	
	Herbert L. Profit		50.00	William, Proklevich		50.00	
	Frank Pugh		25.00	John W. Pyles		225.00	
	John H. Queen		125.00	Amos E. Queenberry		250.00	
	Fred Raker		100.00	Nick Joe Rahall		125.00	
	R. H. Raker		125.00	R. H. Raker		25.00	

8/14/76	Jennings Randolph	50.00	H. Stanley Rawlings	25.00
	Clemmon Ray	25.00	Edith Rayburn	25.00
	Lawrence F. Raymond	50.00	Becky Rebrook	250.00
	William E. Rebrook	250.00	William Rebrook	50.00
	Clarence V. Reed	125.00	Jon A. Reed	50.00
	Robert <sup>1/4</sup> Reed	250.00	Thurman Reed	50.00
	James P. Reid	50.00	Clyde W. Reinhart	125.00
	Peggy Reitnere	25.00	Charles V. Renner	25.00
	Alfred R. Reppert	25.00	L. G. Rice	50.00
	Don R. Richardson	125.00	Herbert W. Richardson	125.00
	Robert Richmond	100.00	William B. Rife	50.00
	Blanche E. Rigglesman	75.00	Frank Rinchich	50.00
	Robert A. Ringel	25.00	Mary E. Risen	25.00
	James E. Ritchea	50.00	Walter Rollins	100.00
	Dominick <sup>1/4</sup> Romino	175.00	Nicholas Roomy, Jr.	150.00
	Holaine Rotgin	6.00	Donald A. Rude	75.00
	Fred <sup>1/4</sup> Rusmisseil	125.00	Phyllis J. Rutledge	137.00
	Jerry A. Roach	100.00	Jacob <sup>1/4</sup> Robinson	25.00
	Lucinda Robinson	25.00	John D. Rockefeller IV	250.00
	Benny F. Rodrigues	125.00	Robert J. Rogers	200.00
	Jimmy Rogers	250.00	Teddy Rogers	25.00
	Helen B. Rollins	250.00	Jack Roop	25.00
	Herschel Rose	50.00	Charles Rotgin	25.00
	H. F. Ross	50.00	Agnes Roush	25.00
	Harold Rudin	125.00	John R. Rudy	75.00
	Gary A. Sacco	125.00	James E. Sago	50.00
	Robert J. Samol	125.00	Albert L. Sommerville	125.00
	Carman Samples (1/100)	50.00	Arnold A. Samuels	25.00
	Robert M. Sanders, Jr.	125.00	Stella <sup>1/4</sup> Sargent	25.00
	F. Lyle Satten	125.00	George H. Saulson	50.00
	Roland Savilla	50.00	John A. Saxon	125.00
	Brad Sayre	25.00	Mrs. Woodrow Scarborough	50.00
	Woodrow Scarborough	75.00	Clyde A. Schau	50.00
	Mark H. Schaul	100.00	Bud Schearl	50.00
	B. Lee Schlaegel, Jr.	25.00	Robert H. Schmidt	125.00

DATE	NAME OF CONTRIBUTOR (Print Name Last)	AMOUNT	NAME OF CONTRIBUTOR (Print Name Last)	AMOUNT
8/14/76	Dewey E. Shultz	\$ 25.00	Albert Schenke II	\$ 125.00
	John Scott	125.00	James N. Sell	125.00
	Barbara Ann Selman	125.00	Don R. Sensabaugh, Jr.	25.00
	Christine Sergeant	25.00	William D. Sergeant	25.00
	James Shahan	50.00	Thomas R. Sharps	25.00
	William J. Shearer	125.00	Frances Sheets	50.00
	Robert E. Sheets	50.00	Nowlin R. Sheets	125.00
	Richard Shelton	175.00	Jimmie Sheppard	12.50
	Walton S. (Toney) Shephard	75.00	Marion V. Shiflet	200.00
	D. Truman Shrewsbury	25.00	Sterl F. Shinaberry	125.00
	Pam Sue Shuman	25.00	Edgar C. Siegrist	25.00
	Victor Skeen	25.00	Clara Lee Sibold	125.00
	Naaman L. Sidebottom	25.00	Teresa Lynn Siders	50.00
	Bernard R. Simmons	25.00	Eloise B. Simms	31.00
	Fred L. Sims, Jr.	25.00	Philip R. Simpson	25.00
	Homer W. Singleton	25.00	Mike V. Sinicropi	225.00
	Mary C. Sites	25.00	R. E. Sizemore	125.00
	William J. Skidmore	100.00	Slack for Congress Com.	250.00
	Dorothy T. Smith	62.50	Edgar L. Smith	125.00
	Geraldine J. Smith	125.00	Glenn Smith	25.00
	Guy Smith	125.00	Homer Smith	125.00
	Hulett C. Smith	225.00	Ike S. Smith	25.00
	James S. Smith	12.50	Joe F. Smith	150.00
	Joe L. Smith	125.00	Katherine Smith	50.00
	Lyle A. Smith	125.00	Paula Y. Smith	13.00
	Roy Smith	25.00	R. Gary Smith	25.00
	Richard Smith	125.00	Roger T. Smith	50.00
	Sherry Smith	25.00	Robert J. Smithinge	25.00
	Mindell Smolowitz	25.00	Tillie Snowgrass	25.00
	M. Alice Snyder	25.00	John McGarry Snyder	25.00
	Any Son	125.00	Louis S. Southworth	50.00
	Don Spangler	125.00	Bessie D. Sparks	100.00
	John Spears	250.00	Ursula M. Spears	125.00
	O. Connor Spaulding	175.00	Cheryl Spencer	25.00



6/14/75	Man R. Spensard	10.00	George I. Spensard	25.00
	Charles A. Spurlock	75.00	Rosemary Squires	25.00
	T. Ted/Stacy	125.00	Margaret B. Stafford	50.00
	Harley O. Staggers	100.00	Larry Stalnaker	25.00
	Wm. A. Stanley	12.50	Douglas Staples	250.00
	Andy Starcher	150.00	Genevieve Starcher	25.00
	Larry V. Starcher	25.00	Wavie M. Starcher	100.00
	Helen V. Stayley	25.00	Linda L. St.Clair	100.00
	Sol N. Steffan	125.00	Francis H. Stender	25.00
	Robert M. Steptoe	50.00	Julius Jay Stern	100.00
	Thomas J. Stevens	25.00	John L. Stewart	125.00
	Jon R. Stewart	5.00	R. B. Stewart, Jr.	25.00
	Garnie Stidham	100.00	Charles W. Stipe	25.00
	George W. Stokes	50.00	Thelma Stone	6.00
	William D. Stone	131.00	William K. Stone	50.00
	O. Vince Stonestreet (Mrs.)	75.00	Clarence Stover	25.00
	Thelma Stover	25.00	William O. Stover	25.00
	Samuel A. Strickland	75.00	Lucille W. Stuart	25.00
	James V. Stump	25.00	Christina Sturgell	125.00
	Elizabeth Sturm	50.00	Mrs. Albert T. Summers	100.00
	Marjorie H. Summers	50.00	Willard A. Sullivan, Jr.	125.00
	James M. Sutton	50.00	Martin P. Sweeney	25.00
	Kenneth L. Swiger	100.00	Lyle C. Tabb	50.00
	Mrs. Lyle C. Tabb	25.00	Louis R. Tabit	25.00
	Richard K. Talbott	125.00	Douglas H. Tanner	125.00
	A. Dale Taylor	125.00	Douglas J. Taylor	87.00
	Jean B. Taylor	25.00	Dr. Randall A. Taylor	25.00
	Thurman Taylor	50.00	Stephanie D. Teague	25.00
	Stanley Tenney	25.00	Venona E. Terry	125.00
	Odell B. Thorpe	25.00	Andrew J. Thomas	125.00
	Clinton C. Thomas	50.00	Harold Thomas	25.00
	J. A. Thomas	25.00	Lewis P. Thomas	125.00
	Marian Pope Thomas	125.00	Patty L. Thomas	50.00
	Ed Thompson	25.00	Loudean M. Thompson	50.00
	Harry L. Thompson	25.00	Roger L. Thompson	125.00



REPORT OF THE BOARD OF DIRECTORS OF THE CITY OF LOS ANGELES FOR 1936

Name		Amount	Name		Amount
8/14/76	Lucille W. Thornhill	\$ 201.00	Thomas Tomblin	\$ 100.00	
	Ira J. Tombllyn	25.00	Roger W. Tompkins	125.00	
	Daniel R. Tonkovich	125.00	Charles S. Townsend	25.00	
	Helen T. Treanor	31.00	Curtis <sup>2</sup> Trent	50.00	
	Charlotte Trenton	50.00	Willie A. Triplett	25.00	
	Thomas R. Troitino	250.00	Mary Lou Trump	25.00	
	C. Samuel Trump	25.00	Callie Tsapis	125.00	
	Joseph Tucker	50.00	Jack M. Tully	25.00	
	Elen Turley	25.00	Charles T. Tweel	75.00	
	Janice Umberger	50.00	Forest Underwood	50.00	
	Frank Valentine	50.00	George A. Vandale	125.00	
	Dorothy C. Vandelinde	12.50	Charles Van Horn	100.00	
	Charles Van Metre	25.00	Virginia A. Varnum	25.00	
	Elizabeth Viars	25.00	Earl M. Vickers	50.00	
	Edward L. Vorholt (Mrs.)	75.00	Grace Walker	25.00	
	Richard E. Walker	100.00	Verlin <sup>W.</sup> Walker	50.00	
	David E. Wallace	125.00	Lorena Wallace	25.00	
	Mrs. H <sup>1</sup> B. Walsh	250.00	Clarence Wamsley	10.00	
	Kenneth V. Ward	25.00	Lafe <sup>n</sup> Ward	175.00	
	Mrs. Paul <sup>B</sup> Ward	18.00	Paul H. Ward	125.00	
	Ellen <sup>B</sup> Warden	25.00	Phil W. Ware	25.00	
	Lucille Watkins	25.00	Oscar Watkins	25.00	
	J. E. Watson	50.00	William <sup>F</sup> Watson	150.00	
	John S. Watts	125.00	William C. Weaver	100.00	
	Lyle O. Weagel	25.00	F. Alvin Webb	100.00	
	Haymer P. Webb	25.00	Hays Webb	25.00	
	Henry B. Wehrle, Jr.	125.00	Russell S. Wehrle	250.00	
	John R. Welmer	25.00	Michael R. Wenger	50.00	
	June Westfall	50.00	Mrs. Maxine Wharton	50.00	
	Vernon C. Whitacre	125.00	Clarence C. White	50.00	
	Clyde White	50.00	John E. White	125.00	
	Mary Lou White	50.00	Elson White	25.00	
	Samuel R. White	100.00	Sara Louise White	25.00	
	William C. White	25.00	William R. White, Jr.	25.00	
	John H. Whittemer	25.00			

UNITED STATES DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT

DATE	NAME OF DONOR (First, M. I., Last)	AMOUNT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
8/14/76	Albert Whitmer	\$ 25.00	David Wilberty	\$ 25.00
	Ruth Ann Widmeyer	125.00	Pamela K. Wiggins	25.00
	Barbara Wilburn	25.00	Daniel Wilburn	25.00
	Lorraine Wilcoxon	25.00	Robert E. Wilkinson	100.00
	Gene Hal Williams	50.00	Mary Margaret Williams	25.00
	Ralph D. Williams	50.00	Ray A. Williams	25.00
	Mrs. Helen Williamson	31.00	Willis E. Williamson	50.00
	Martin Willis	50.00	K. Ralph Willman	25.00
	Richard H. Wilson	25.00	Robert E. Wilson	25.00
	Robert Wingett	25.00	Mrs. Andy Winnebrenner	25.00
	Henry D. Winnell	25.00	Thomas A. Winner	125.00
	Socia A. Winter	93.00	Robert Withrow	250.00
	Reba A. Wolf	25.00	Bessie R. Wolfe	25.00
	L. Emery Woodall	125.00	Corbett C. Woodrum	25.00
	Anna Mary Woods	25.00	Lonzo Woods	25.00
	Elizabeth Wooton	125.00	William R. Wooton	25.00
	Bonnie N. Worden	50.00	C. L. (Babe) Workman	50.00
	D. Kyle Workman	125.00	M. A. Workman	50.00
	Thurman Workman	25.00	Elizabeth K. Wysong	25.00
	Forrest B. Wysong, Jr.	50.00	John W. Yago	25.00
	Anthony Yanero	125.00	Phyllis Yarnevic	30.00
	Don Yoak	125.00	Frank R. Yoke, Jr.	25.00
	Chalmer L. Young	25.00	William J. Young	25.00
	Joseph S. Zambito	125.00	George D. Zambias	250.00
	Stanley C. Ziemnick	50.00	United Steelworkers of America	100.00x

STATE OF WEST VIRGINIA, COUNTY OF KANAWHA, BEING DULY SWORN, DEPOSES AND SAYS THAT THE FOLLOWING IS A TRUE AND CORRECT STATEMENT, TO THE BEST OF HIS KNOWLEDGE AND BELIEF, OF ALL FINANCIAL TRANSACTIONS OCCURRING WITHIN THE PERIOD COVERED BY THIS STATEMENT.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
5/17/76	Blue Cross Hospital Service	Commerce Square Charleston, W. Va.	\$ 60.42
5/17/76	(Daily paper) Charleston Newspapers	1001 Virginia St. Charleston, W. Va.	8.45
5/17/76	C. & P. Telephone Company	408 Broad St., Charleston, W. Va.	103.37
5/17/76	S. Spender Moore Co. (office supplies)	113 Capitol St. Charleston, W. Va.	6.39
5/29/76	Quick Copy, Inc.	240 Capitol St. Charleston, W. Va.	5.98
5/27/76	U.S. Postmaster-Charleston	Post Office Charleston, W. Va.	100.00
5/29/76	Daniel Boone Hotel (Reception)	Washington & Capitol Sts. Charleston, W. Va.	223.49
6/2/76	John E. Howell (Refreshments for Reception)	3803 Venable Ave., S. E. Charleston, W. Va.	83.77
Any additional pages needed for other expenditures must include all of the above requested information. See attached seven pages			S/T 596.67
TOTAL			\$ 62,055.38

(G)

I further certify that this statement lists all financial transactions, as reported above in Sections C, D, and F, for the period beginning on the 12th day of May, 19 76, and ending on the 22 day of October, 19 76.

(H)

I further certify that the total expenditure for the nomination, election or defeat of my candidacy (or any person or organization advocating or opposing the nomination, election or defeat of any candidate), or the passage or defeat of any issue, thing or item to be voted upon, in whose behalf an expenditure was made or a contribution was given for the Election is \$ 62,055.38.  
(This total includes all expenditures made as of the date of this statement, including all expenditures previously reported in other statements.)

## OATH OR AFFIRMATION

State of West Virginia

County of Kanawha, ss.

Robert J. Burke, being duly sworn, deposes and says that the foregoing is a true and correct statement, to the best of his knowledge and belief, of all financial transactions occurring within the period covered by this statement.

*[Signature]*  
Notary Public

Subscribed and sworn to before me this 28th day of October, 19 76.

*[Signature]*  
Notary Public

My Comm. expires on the 17 day of January, 19 89.

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The following is a statement of the expenditures made by the Committee for the purpose of carrying out the program of the Committee, and of the income received by the Committee, during the period covered by this statement.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
6/1/76	Terrace Park East (Rent)	2106 Kanawha Blvd. E. Charleston, W. Va.	\$ 250.00
6/6/76	Holiday Inn (meeting room)	600 Kanawha Blvd., E. Charleston, W. Va.	36.53
6/12/76	Blue Cross Hospital Ser. Inc. (Insurance)	1600 Commerce Square Charleston, W. Va.	60.42
6/12/76	C & P Telephone Co.	408 Broad St. Charleston, W. Va.	117.76
6/12/76	Gulf Oil Corp.	P.O. Box 51157 Atlanta, Ga.	108.84
6/12/76	Woman's Club of Charleston (dues)	Va. & Elizabeth St. Charleston, W. Va.	15.00
6/12/76	Phillips (restaurant service)	600 Kanawha Blvd. E. Charleston, W. Va.	873.33
6/12/76	Xerox Corp. (machine rental & use)	644 Linn Street Cincinnati, Ohio	178.28
6/12/76	Xerox Corp. (Office equipment)	644 Linn St. Cincinnati	140.60
6/15/76	Quick Copy (Service)	240 Capitol St. Charleston, W. Va.	6.96
6/17/76	U. S. Postmaster, Charleston (postage for machine)	Federal Building Charleston, W. Va.	100.00
6/26/76	<sup>A.</sup> Victor/Barone Legal Service	1598 Virginia St., E. Charleston, W. Va.	500.00
6/26/76	Democratic Conv. Housing Room Deposits)	1625 Mass. Ave., N.W. Washington, D. C.	200.00
6/28/76	<sup>A.</sup> Victor/Barone, Travel Expenses	1598 Virginia St., E. Charleston, W. Va.	57.00
7/2/76	Mountaineer Tour & Travel Travel Expenses	216 Main St. Beckley, W. Va.	152.00
7/2/76	Terrace Park East Rent	2106 Kanawha Blvd., E. Charleston, W. Va.	250.00
7/2/76	U. S. Postmaster, Chas. Postage Machine	Post Office Charleston, W. Va.	200.00
7/9/76	Nat. Bank of Com. Travelers Cks. of Expenses at Nat. Conv.	Commerce Square Charleston, W. Va.	350.00
7/9/76	Blue Cross Hospital Ser. Insurance	1600 Commerce Sq. Charleston, W. Va.	60.42
7/11/76	Adams Valley Inst. Ser. Coffee Machine	2900 Fourth Ave. Charleston, W. Va.	38.55
7/23/76	U.S. Postmaster-Charleston (dues)	Post Office Charleston, W. Va.	156.00
7/24/76	International Shops Gifts	600 Kanawha Blvd. E. Charleston, W. Va.	36.97

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... and the amount of such expenses and amounts incurred during the period covered by this statement.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
7/28/76	Quick Copy duplicating service	240 Capitol St. Charleston, W. Va.	\$ 6.03
7/30/76	A. Victor/Barone Travel expenses	1598 Virginia St. E. Charleston, W. Va.	219.92
7/30/76	C & P Telephone Co. Service	408 Broad St. Charleston, W. Va.	230.39
7/30/76	Gulf Oil Corporation Travel Expense	P.O. Box 51157 Atlanta, Ga.	78.75
8/3/76	Terrace Park East Rent	2106 Kanawha Blvd. Charleston, W. Va.	250.00
5/15/76	Jewell Bailey Payroll	1923 Hudson St. Charleston, W. Va.	605.82
5/17/76	Kanawha Banking & Trust Int. on Note	Capitol St. Charleston, W. Va.	400.00
6/1976	Jewell Bailey Payroll	1923 Hudson St. Charleston, W. Va.	605.82
6/12/76	W.Va. State Tax Dept. Withholding	State Capitol Charleston, W. Va.	12.76
6/12/76	Nat. Bank of Comm. Federal Tax Dep.	Commerce Square Charleston, W. Va.	175.00
7/1976	Jewell Bailey Payroll	1923 Hudson St. Charleston, W. Va.	605.82
7/1/76	W.Va. Dept. of Employment Security	State Capitol Charleston, W. Va.	5.85
7/8/76	Nat. Bank of Summers Int. on Note	Hinton, West Va.	897.53
8/1976	Jewell Bailey Payroll	1923 Hudson St. Charleston, W. Va.	605.82
8/3/76	Blue Cross Hospital Ser. Insurance	1600 Commerce Sq. Charleston, W. Va.	60.42
8/3/76	C & P Telephone Co. Service	408 Broad St. Charleston, W. Va.	187.97
8/3/76	S. Spencer Moore Co. Supplies	118 Capitol St. Charleston, W. Va.	24.72
8/5/76	U. S. Postmaster-Chas. Postage	Post Office Bldg. Charleston, W. Va.	200.00
8/7/76	W.Va. Dept. Employment Sec.	State Capitol Charleston, W. Va.	30.11
8/7/76	W.Va. Workman's Comp. Fund	State Capitol Charleston, W. Va.	9.43
8/7/76	W.Va. State Tax Dept.	State Capitol Charleston, W. Va.	25.40
8/7/76	Internal Revenue Ser. Fed. Tax.	3131 Democrat. Rd. Memphis, Tenn.	177.05



DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
8/9/76	Jones Printing Co., Inc. Office Supplies	P.O. Box 6038 Charleston, W. Va.	\$ 38.58
8/9/76	Xerox Corp. Office Equipment	644 Linn St. Cincinnati, Ohio	112.66
8/9/76	Pitney Bowes Office Equipment	Walnut & Pacific Sts. Stamford, Conn.	168.92
8/9/76	Fraternal Order of Police Contribution	P.O. Box 222 Charleston, W. Va.	10.00
8/9/76	Charleston Newspaper Agency Daily newspaper	1001 Virginia St. Charleston, W. Va.	8.45
8/9/76	Association of State Dem. Chairman - dues	1625 Mass. Ave. N.W. Washington, D.C.	50.00
8/9/76	Mike Keith maintenance	2106 Kanawha Blvd., E. Charleston, W. Va.	10.00
8/10/76	National Bank of Commerce Fed. Tax Deposit	Commerce Square Charleston, W. Va.	175.00
8/17/76	Victor <sup>A</sup> /Barone Legal Services	1598 Virginia St. E. Charleston, W. Va.	500.00
8/20/76	Kanawha Banking & Trust Interest on Note	Capitol Street Charleston, W. Va.	400.00
8/24/76	Rebecca Rebrook, R.N. (Prof. Service-St. Conv.)	#9 Woodsedge Charleston, W. Va.	40.00
8/30/76	Kanawha Valley Restaurant Service - Coffee	2909 Fourth Ave. Charleston, W. Va.	25.75
8/30/76	Piedmont Airlines Travel Expenses	Airport Charleston, W. Va.	76.00
8/31/76	American Express Co. Hotel-Nat. Conv.	P.O. Box 16000 New York, N. Y.	1,156.45
9/1/76	Jewell Bailey Payroll	1923 Hudson St. Charleston, W. Va.	605.82
9/1/76	J. C. Dillon, Jr. Expenses-St. Ch. Mtg.	2106 Kan. Blvd. E. Charleston, W. Va.	100.00
9/1/76	Terrace Park East Rent	2106 Kan. Blvd., E. Charleston, W. Va.	350.00
9/10/76	Quick Copy Service Co. Duplicating Service	240 Capitol St. Charleston, W. Va.	13.65
9/13/76	Victor <sup>A</sup> /Barone Legal Services	1598 Virginia St. E. Charleston, W. Va.	500.00
9/13/76	Victor <sup>B</sup> /Barone Travel Expenses	1598 Virginia St., E. Charleston, W. Va.	122.44
9/14/76	Barnett V. McGraw, Jr. Contribution	2018 Kanawha Blvd. E. Charleston, W. Va.	1,500.00
9/14/76	W. H. Bailey Contribution	5 Jo Henry Road Fairmont, W. Va.	1,500.00



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and the amount of each expenditure made and liability incurred during the period covered by this statement.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
9/14/76	Glen B. Gainer, Jr. Contribution	1431 Washington Ave. Parkersburg, W.Va.	\$1,500.00
9/14/76	A. James Manchin Contribution	#1 Stella St. Farmington, W.Va.	1,500.00
9/14/76	Sam R. Harshbarger Contribution	Trenol Heights Milton, W. Va.	1,500.00
9/14/76	Thomas B. Miller Contribution	102 Maple Ave. Wheeling, W. Va.	1,500.00
9/21/76	W.Va. Dept. Employment Sec.	State Capitol Charleston, W.Va.	54.99
9/23/76	National Bk. of Commerce Fed. Tax Deposit	Commerce Square Charleston, W. Va.	175.00
9/23/76	Gus R. Douglass Contribution	Griggs Landing, West Virginia	1,500.00
9/23/76	Chauncey H. Browning, Jr. Contribution	709 Canterbury Drive Charleston, W. Va.	1,500.00
9/14/76	Blue Cross Hospital Ser. Insurance	1600 Commerce Square Charleston, W.Va.	60.42
9/24/76	Internal Revenue Service Penalty	3131 Democrat Rd. Memphis, Tenn.	9.22
9/27/76	Jones Printing Co. Office Supplies	P.O. Box 6038 Charleston, W. Va.	92.86
9/27/76	R. L. Polk & Co. Suburban Directory	P.O. Box 26285 Richmond, Virginia	30.90
9/27/76	Roytype Division-Litton Bus. Systems, Inc.- Office Supp.	1031 New Britain Ave. West Hartford, Conn	17.78
9/27/76	Zerex Corp. Office Equipment	644 Linn St. Cincinnati, Ohio	221.32
9/27/76	Gulf Oil Corp. Travel Expenses	P.O. Box 51157 Atlanta, Georgia	85.03
9/28/76	B.J.W. Printers Printing	P.O. Box 1309 Beckley, W. Va.	2,060.00
9/28/76	Jarrett Printing Co. Printing	501 Capitol St. Charleston, W. Va.	303.85
9/28/76	Discount Office Center Office Supplies	901 Virginia St. E. Charleston, W.Va.	463.50
9/28/76	Martin Printing Co. Printing	P.O. Box 524 Clarksburg, W.Va.	66.44
9/28/76	Allen Blueprint & Supply Co. Picture blowups	811 Virginia St. E. Charleston, W.Va.	668.47
9/29/76	U.S. Postmaster-Charleston Postage Machine	Post Office Charleston, W. Va.	200.00

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
9/30/76	The Fruit Bowl Gift	Summers Street Charleston, W. Va.	15.45
9/30/76	Directory Sales Co. Criss Cross Dir.-Chas.	P.O. Box 1764 Charleston, W.Va.	18.75
9/30/76	J. C. Dillon, Jr. Organization mtg. expenses	2106 Kanawha Blvd. E. Charleston, W.Va.	266.25
10/1/76	Terrace Park East Rent	2106 Kanawha Blvd. E. Charleston, W. Va.	300.00
10/4/76	Jan's Flowers	303 Washington St., W. Charleston, W. Va.	20.00
10/4/76	Blue Cross Hospital Ser. Insurance	1600 Commerce Sq. Charleston, W. Va.	60.42
10/4/76	Patterson, Bell & Crane Insurance	P.O. Box 2551 Charleston, W. Va.	165.00
10/4/76	I.B.M. Machine maint.	P.O. Box 6947 Cleveland, Ohio	47.05
10/4/76	C & P Telephone Co. service & extra lines	408 Broad St. Charleston, W. Va.	492.32
10/4/76	C & P Telephone Co. reg. serv.	408 Broad St. Charleston, W.Va.	213.19
10/4/76	Gulf Oil Corp. Travel	P.O. Box 51157 Atlanta, Ga.	79.52
10/4/76	National Bank of Summers Interest on Note	Hinton, West Virginia	907.40
10/4/76	W.Va. St. Tax Dept. Income Withholding	State Capitol Charleston, W. Va.	12.70
10/4/76	W.Va. State Tax Dept. Income With-holding	State Capitol Charleston, W. Va.	12.70
10/5/76	W.Va. Workmen's Comp. Fund	State Capitol Charleston, W. Va.	11.48
10/5/76	Internal Revenue Ser. Federal With holding	3131 Democrat Rd. Memphis, Tenn.	177.05
10/6/76	Gov's. Conf. on International Women's Year - Registration	266 Oakwood Road Charleston, W. Va.	14.00
10/6/76	United Air Lines Travel to St. Ch. Mtg.	Air port Charleston, W. Va.	102.00
10/11/76	Victor Sarone Legal Services	1598 Virginia St. E. Charleston, W. Va.	500.00
10/15/76	Jewell Bailey Payroll	1923 Hudson St. Charleston, W. Va.	391.64
10/18/76	Woodruff Rental of Organ	602 Virginia St. Charleston, W. Va.	35.00
10/18/76	Xerox Supplies	12200 Alameda Dr. Strongsville, Ohio	84.93

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
8/4/76	Quick Copy Duplicating	240 Capitol St. Charleston, W. Va.	\$ 9.22
8/10/76	Lawrence Barker Reimbursement-postage	2008 Kanawha Ave. Dunbar, W. Va.	3.96
8/9/76	Ronald Fisher Reimbursement-postage	Post Office Charleston, W. Va.	5.40
8/11/76	Cle'ments Dinner Club Advance for J.J. Dinner	2805 Kanawha Blvd. E. Charleston, W. Va.	7,000.00
8/12/76	Beni Keden Temple Donation	100 Quarrier St. Charleston, W. Va.	100.00
8/14/76	James Beane Professional Service	509C Nancy St. Charleston, W. Va.	150.00
8/14/76	Jules Michaux Professional Service	P.O. Box 4371 Charleston, W. Va.	25.00
8/12/76	W. Alexander, Inc. Professional Service	660 Madison Avenue New York, New York	1,500.00
8/14/76	Warren Covington Professional Service	660 Madison Avenue New York, New York	1,500.00
8/17/76	John <sup>E</sup> /Howell Refreshments-J.J.	3803 Venable Ave. Charleston, W. Va.	1,612.78
8/24/76	Daniel Boone Hotel Women's meeting-J.J.	P.O. Box 2153 Charleston, W. Va.	2,409.50
9/14/76	Charleston Civic Center J-J expenses	Reynolds St. Charleston, W. Va.	12,858.39
9/14/76	Rose City J-J meals	702 Lee St. Charleston, W. Va.	71.25
9/14/76	The Peanut Shoppe Favors-J.J.	126 Capitol St. Charleston, W. Va.	154.50
9/14/76	Pritt, graphic arts decorations J.J.	714 Jane St. Charleston, W. Va.	1,339.00
9/14/76	Kanawha Valley Regional Trans- portation Auth. - bus rental	P.O. Box 1188 Charleston, W. Va.	90.00
9/14/76	S. Spencer Moore Co. Supplies	118 Capitol St. Charleston, W. Va.	100.00
9/14/76	Gardner Photographics Professional Services	1552 Quarrier St. Charleston, W. Va.	135.96
9/14/76	International Shops Program gifts	600 Kanawha Blvd. E. Charleston, W. Va.	56.95
9/14/76	Samart Printing Co. Printing	501 Capitol St. Charleston, W. Va.	2,757.67
10/4/76	Winter Floral Co. Flowers	707 Lee St. Charleston, W. Va.	171.50
10/4/76	Sam's Flowers Flowers	303 W. Washington St. Charleston, W. Va.	22.50

I, \_\_\_\_\_, of \_\_\_\_\_, State of \_\_\_\_\_, do hereby certify that the foregoing is a true and correct statement of the amount of cash expenditures made and liabilities incurred during the period covered by this statement.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
10/4/76	Kanawha Co. Women's Democratic Club-Favors	2106 Kanawha Blvd. E. Charleston, W. Va.	\$ 50.00

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# Statement of Receipts and Expenditures for Candidates, Agents, Treasurers or Committees

This statement is required to be filed according to the provisions of West Virginia Code §3-8-5 within 30 days after the date of the Election with the Secretary of State, Charleston, West Virginia, for all offices to be filled or issues to be voted upon by the voters of a political division greater than a county. For all offices to be filled or issues to be voted upon by the voters of a county or district therein, file this statement with the County Clerk. For all offices to be filled or issues to be voted upon by the voters of a city, file this statement with the City Clerk or Recorder. This statement has been prepared by James R. McCartney, Secretary of State of West Virginia, pursuant to the provisions of West Virginia Code §3-8-6.

(A)

Full Name of Candidate, Agent, Treasurer or Committee West Virginia State Democratic Executive Committee  
Robert J. Burke, Treasurer  
 (First) (Middle Initial) (Last)

Candidate for; or Agent, Treasurer or Committee in support of the following candidate or cause Entire Democratic Ticket  
 (Office sought, or candidate or cause supported)

State of West Virginia  
 (District or Circuit if any)

Party Affiliation (if any) Democratic

Office Residence 2106 Kanawha Blvd., E. Mailing Address 2106 Kanawha Blvd., E.  
 (Number) (Street) (Street Address or Box Number)

Charleston 25311 Charleston 25311  
 (Town or City) (Zip) (Town or City) (Zip)

Residence Telephone Business Telephone 304-342-2121

(B)

The balance of cash and any other sum of money on hand at the beginning of the period covered by this financial statement is \$ 60,727.73

The balance of cash and any other sum of money on hand at the end of the period covered by this financial statement is \$ 62,989.06

(C)

I hereby certify that the following is a true, complete, and itemized statement of all monies and other tangible things of value contributed or advanced by anyone, together with the full names of all such persons, firms, associations or committees who have made advances or contributions, provided that any contribution totaling more than fifty dollars (\$50.00) by any one contributor is by money order or by check.

## CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
11/1976	C. Herbert Traubert	\$ 100.00	11/1976	Mrs. James J. Arcure	\$ 200.00
11/1976	Eugene P. Weitzel	50.00			
11/1976	Blanche E. Rigglesman	10.00			
11/1976	Richard E. Evans, Sr.	10.00			
11/1976	Patricia B. Hunter	5.00			
11/1976	Mrs. Harry A. Daque	100.00			
11/1976	John D. Foshel-Leller IV	100.00			
11/1976	Helvin G. Armentrout	50.00			
11/1976	Joe N. DeAntonis	250.00			
11/1976	John E. Howell	100.00			

Any additional pages needed for other contributions of \$250 or less must include all of the above requested information.

TOTAL \$ 975.00



DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
11/1976	Anthony J. Yanero	Fairmont, W.Va. P.O. Box 643,	Wholesaler	\$2,000.00
11/1976	Vincent F. D'Annunzio	202 Candlelight Dr. Clarksburg, W.Va.	Beverage Distributor	500.00
11/1976	Vincent F. D'Annunzio for David D'Annunzio	110 Emerson Rd. Clarksburg, W.Va.	Beverage Distributor	500.00
11/1976	Josephine Faix (NMI)	200 Ferry St. Clarksburg, W. Va.	Beverage Distributor	1,000.00
11/1976	United Auto Workers U.A.W. - V - CAP	8000 E. Jefferson Ave. Detroit, Michigan	Union	5,000.00
10/1976	Gus R. Douglass	Grimes Landing, W.Va.	W.Va. Commissioner of Agriculture	1,500.00 *
	* Return of Contribution.			
TOTAL				\$10,500.00

Any additional pages needed for other contributions exceeding \$250 must include all of the above requested information.

(D)

I further certify that the following is a true, complete, and itemized statement of every FUND RAISING EVENT held during the period covered by this financial statement. A FUND RAISING EVENT means any event such as a dinner, reception, testimonial, cocktail party, auction or similar affair through which contributions are solicited or received by such means as purchase of a ticket, payment of an attendance fee or through purchase of goods and services.

#### FUND RAISING EVENTS

Date of Event	August 14, 1976	Date of Event	
Type of Event	J. J. Dinner (Reported on Pre-Election Report)	Type of Event	
Address of Place Held		Address of Place Held	
Name of Place Held	" "	Name of Place Held	
Total Expenditures	\$ " "	Total Expenditures	\$
Net Receipts	\$ 1,509.50 in addition to Net Receipts of \$105,323.50 Reported on Pre-Election Report)	Net Receipts	\$

Date of Event		Date of Event	
Type of Event		Type of Event	
Address of Place Held		Address of Place Held	
Name of Place Held		Name of Place Held	
Total Expenditures	\$	Total Expenditures	\$
Net Receipts	\$	Net Receipts	\$

Any additional pages needed for Fund Raising Events must include all of the above requested information.



# FUND RAISING EVENT

CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
8/14/76	Cecil L. Hedrick	\$ 100.00	8/14/76	Margaret D. Friedman	\$ 50.00
	Mason Co. Democratic Women's Org.	25.00		Mildred McClung Craig (Mrs.)	25.00
	Elaine Coronel	25.00		George F. Neville	75.00
	C. Edgar Pratt	50.00		M. P. McHale	25.00
	Leatrice J. Stout	25.00		C. M. Long	50.00
	Virginia D. Stewart	50.00			
	Stanley M. Sears	50.00			
	James C. Cain	25.00			
	John W. Hefner	25.00			
	Paul M. Scott	50.00			
	Wm. H. Johnson	25.00			
	Ralph E. Hayes	50.00			

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL \$ 725.00

# FUND RAISING EVENT

CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EXCEED \$250  
(Residence, Mailing Address, Business and Occupation must be listed)

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
8/14/76	Mason County Dem. Exec. Com.	Rt. 1, Box 98-B Pt. Pleasant, W. Va.		\$ 475.00
	Harry C. Beale	P.O. Box 109 Rupert, West Virginia	Salesman Mobile Homes	309.50

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL \$ 784.50

(E)

I further certify that all contributions received during the period covered by this financial statement have been reported above in Section C or Section D or both, and that the total amount of all such contributions is \$ 12,911.50

I further certify that the following is a true, complete, and itemized statement showing the date, amount and purpose of each expenditure made or liability incurred, together with the full name, residence and mailing address of each person, firm, association, or committee to whom such expenditure was made or liability incurred, and the total amount of such expenditures made and liabilities incurred during the period covered by this statement.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
10/25/76	Campaign Contribution George G. Griffith	3720 Collins Way Weirton, West Virginia	\$ 200.00
10/25/76	Campaign Contribution Dan Tonkovich	506 Benwood Hill Rd. Benwood, West Virginia	200.00
10/25/76	Campaign Contribution David G. Hanlon	111 S. Court St. Harrisville, West Virginia	200.00
10/25/76	Campaign Contribution R. T. Sizemore, Jr.	P.O. Box 34 Clay, West Virginia	200.00
10/30/76	Payroll Jewell Bailey	1923 Hudson St. Charleston, West Virginia	391.64
11/1/76	Office Supplies Kanawha Valley Rest. Service	2909 Fourth Ave. Charleston, West Virginia	35.28
11/1/76	Terrace Park East - Rent	2106 Kanawha Blvd., E. Charleston, West Virginia	300.00
11/1/76	Election Day Expenses-General Wayne County Democratic Ex. Com.	P.O. Box 187 East Lynn, West Virginia	1,000.00
Any additional pages needed for other expenditures must include all of the above requested information.			Sub Total 2,526.92
See attached pages 2 and 3			TOTAL \$ 10,723.17

(G)

I further certify that this statement lists all financial transactions, as reported above in Sections C, D, and F, for the period beginning on the 23rd day of October, 1976, and ending on the 23rd day of November, 1976.

(H)

I further certify that the total expenditure for the nomination, election or defeat of my candidacy (or any person or organization advocating or opposing the nomination, election or defeat of any candidate), or the passage or defeat of any issue, thing or item to be voted upon, in whose behalf an expenditure was made

or a contribution was given for the Election is \$ 72,778.55.  
(This total includes all expenditures made as of the date of this statement, including all expenditures previously reported in other statements.)

#### OATH OR AFFIRMATION

State of West Virginia

County of Kanawha, ss.

Robert J. Burke, being duly sworn, deposes and says that the foregoing is a true and correct statement, to the best of his knowledge and belief, of all financial transactions occurring within the period covered by this statement.

*Robert J. Burke, Treasurer*  
Signature of Candidate, Agent, or Treasurer

Subscribed and sworn to before me this 23rd day of November, 1976.

*Jewell Bailey*  
Notary Public

My Commission expires on the 17th day of January, 1985.

3 1 2 4 2 2 1 2 1 1 1  
 The following are the items which were paid for during the period covered by this statement.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
11/1/76	General Election day expenses Cabell Co. Dem. Exec. Com.	P.O. Box 1965 Huntington, West Virginia	\$ 500.00
11/9/76	Insurance Blue Cross Hospital Ser.	1600 Commerce Sq. Charleston, West Virginia	60.42
11/9/76	Service C & P Telephone Co.	Broad Street Charleston, West Virginia	143.88
11/9/76	Subscription Charleston Newspapers	The Gazette - Virginia St. Charleston, West Virginia	8.45
11/9/76	Travel Expenses Gulf Oil Corporation	P.O. Box 51157 Atlanta, Georgia	42.15
11/9/76	Dues Assoc. of State Dem. Chairmen	1625 Mass. Ave. Washington, D. C.	100.00
11/9/76	Special Service Lines C & P Telephone Co.	P.O. Box 3163 Charleston, West Virginia	938.09
11/9/76	Xerox Machine & Supplies Xerox Corp.	644 Linn St. Cincinnati, Ohio	170.76
11/12/76	Legal Services Victor Barone	1598 Virginia St. E. Charleston, West Virginia	500.00
11/15/76	Jewell Bailey - Payroll	1923 Hudson St. Charleston, West Virginia	391.64
11/15/76	Income Tax Division W. Va. State Tax Dept.	State Capitol Charleston, West Virginia	20.82
11/15/76	Tax Deposit National Bk. of Commerce	Commerce Square Charleston, West Virginia	200.00
11/1/76	Gen. Election Day Expenses Mr. Steve Adkins (NMI) (Dispersed as follows:	P.O. Box 327 Delbarton, West Virginia	600.00
	Mr. Howard Bailey (NMI)	Delbarton, W. Va.	\$50.00)
	Mr. Bernie Maynard (NMI)	Ragland, W. Va.	50.00)
	Mr. Paul Sizemore (NMI)	Delbarton, W. Va.	50.00)
	Mr. Jack Spence (NMI)	Rt. 1, Delbarton, W. Va.	50.00)
	Mr. Wilson Currey (NMI)	Rt. 1, Delbarton, W. Va.	50.00)
	Mr. James H. Varney	Delbarton, West Virginia	50.00)
	Mr. Grover Vance (NMI)	Delbarton, West Virginia	50.00)
	Mr. Woodrow Protter (NMI)	Delbarton, West Virginia	50.00)
	Mr. Jim Hignite (NMI)	Rt. 1, Lenore, W. Va.	50.00)
	Mr. Teddy Hall (NMI)	Rt. 1, Williamson, W. Va.	50.00)
	Mr. Deway Chafin (NMI)	Rt. 1, Lenore, W. Va.	50.00)
	Mr. Harold Williamson (NMI)	Rt. 1, Williamson, W. Va.	50.00)
11/1/76	Gen. Election Day Expenses Mr. E. Donald Evans (Dispersed as follows:	P.O. Box 2235 Williamson, West Virginia	200.00
	Mr. Columbus Avery	232 Mulberry St. Williamson, W. Va.	50.00)
	Mr. William Accord (NMI)	521 Goshain Ave. Williamson, W. Va.	50.00)
	Mr. A. H. Maynard	P.O. Box 592 Williamson, W. Va.	50.00)
	Mr. York Smith, Jr. (NMI)	605 E. 7th Ave. Williamson, W. Va.	50.00)

This statement is being filed with the Commission on Governmental Ethics and Public Administration, showing the date, amount, and purpose of each expenditure made or liability incurred, and the full name, residence and mailing address of each person, firm, association, or committee to whom such expenditure was made or liability incurred, and the total amount of such expenditures made and liabilities incurred during the period covered by this statement.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
11/1/76	Gen. Election day expenses. Mr. R. Doyle Van Meter (Dispensed as follows: Mr. George Ward (NMI) Mr. Johnny Hatfield Mr. John W. (Bill) Keese Mr. Bill Webb Alice Ketchum (NMI)	P.O. Box 1348 Williamson, West Virginia Goodman Manor, Williamson, W. Va. Gen. Delivery Williamson, W. Va. 310 Slater St. Williamson, W. Va. Park Way Drive Williamson, W. Va. Gen. Delivery Williamson, W. Va.	300.00 50.00 50.00 50.00 100.00 50.00
11/1/76	Gen. Election Day Expenses Mr. Johnny Mahon (Dispensed as follows: Mr. Herman J. Mahon Mr. Ralph Jack Vance	Rt. 1 Delbarton, W. Va. Myrtle, W. Va. Myrtle, W. Va.	200.00 100.00 100.00
11/1/76	Gen. Election Day Expenses Mr. Joey Kohari (NMI) (Dispensed as follows: Mr. Mose Pinson (NMI) Mr. Ben Sammons (NMI) Mr. Jim Kohari (NMI) Mr. Charles Scott (NMI) Mr. Calvin Johnson (NMI) Jean Chapman (NMI)	General Delivery Chattaroy, W. Va. Chattaroy, W. Va. Chattaroy, W. Va. Chattaroy, W. Va. Chattaroy, W. Va. Chattaroy, W. Va.	300.00 50.00 50.00 50.00 50.00 50.00
11/1/76	Gen. Election Day Expenses Mr. Wallace Miller (NMI) (Dispensed as follows: Mr. Alex Mannard (NMI) Ms. Susie Preece (NMI) Mr. Reaford Markham (NMI) Mr. John Preece (NMI)	Kermit, W. Va. Kermit, W. Va. Kermit, W. Va. Kermit, W. Va. Kermit, W. Va.	200.00 50.00 50.00 50.00 50.00
11/1/76	Gen. Election Day Expenses Mr. Watson Simpkins (NMI) (Dispenses as follows: Mr. Watson Simpkins (NMI) Mr. Jack Simpkins (NMI)	Route 1, Meador, West Virginia Meador, West Virginia Meador, West Virginia	100.00 50.00 50.00
11/1/76	Gen. Election Day Expenses Mr. Elliott Burke (NMI) (Dispenses as follows: Mr. Joe Justice (NMI) Mr. Elliott Burke (NMI)	Route 3, Delbarton, West Virginia Rt. 1, Delbarton, W. Va. Rt. 1, Delbarton, W. Va.	100.00 50.00 50.00
11/3/76	Political Advertising Canfield, Miller & Assoc.	P.O. Box 1424 Charleston, West Virginia	3,115.02*

\* Out of the above amount, \$2,782.11 was disbursed as per the attached schedule to daily and weekly newspapers.



News Leader

\$ 10.00

10.00

12.50

11.20

10.40

9.00

20.00

21.00

14.00

10.00

11.50

County Courier

25.00

Democrat & Republican

21.10

Leader

21.00

Price

18.20

9.00

12.00

10.00

3.00

14.00

Article

10.20

21.00

18.00

20.20

14.00

14.00

18.00

75.79

# CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EXCEED \$250 OR LESS

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
8/19/78	Anthony Adams, Jr. NMI	\$ 25.00	8/19/78	Donald R. Adams	\$ 25.00
	Menis C. Adkins	50.00		Cline Adkins NMI	25.00
	Mrs. Gerald B. Adkins	50.00		John Adkins NMI	25.00
	Johnnie Adkins NMI	25.00		Larry C. Adkins	50.00
	Larry L. Adkins	25.00		Ralph D. Adkins	25.00
	M. William Adler	25.00		Jack C. Adrian	50.00
	M. Jamil Ahmed	100.00		William E. Albers	100.00
	Thomas J. Alford	100.00		Lillian F. Alfred	25.00
	Robert E. Alfred	25.00		June L. Allen	250.00
	Jack Alsop NMI	25.00		Dennis Altizer NMI	25.00
	Marjorie H. Altizer	25.00		Amalgamated Transit Un.	200.00
	C. H. Amick	50.00		COPE	
				John A. Anderson	100.00
sub-total					1,425.00
TOTAL					\$55,278.00

Any additional pages needed for Fund Raising Events must include all of the above requested information.

See attached 14 pages

## FUND RAISING EVENT

### CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EXCEED \$250 (Residence, Mailing Address, Business and Occupation must be listed)

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
8/19/78	Johnnie Adkins NMI	Hamlin, WV	Transportation Bd. of Ed.	\$ 625.00
	Harold S. Albertson	710 Virginia St. E. Charleston, WV	Attorney	400.00
	Russell G. Beall	2102 Maxwell Ave. Parkersburg, WV	Contractor	275.00
	Robert J. Burke	36 Orchard St. Wheeling, WV	President Warwood Tool Co.	300.00
	W. Gaston Caperton	1014 Kanawha Blvd. E. Charleston, WV	Insurance	500.00
	John J. Cafaro	2445 Belmont Ave. Youngstown, Ohio	Construction	1,000.00
	Robert L. Childers	1551 Ritchie Drive Huntington, WV	Adj. Gen. W. Va.	500.00
	Gail R. Clark	1033 Quarrier St. E. Charleston, WV	Elect. Contractor	350.00
	J. C. Dillon, Jr.	2106 Kanawha Blvd. E. Charleston, WV	Merchant Clerk, St. Senate	500.00
sub-total				4,450.00
TOTAL				\$ 14,625.00

Any additional pages needed for Fund Raising Events must include all of the above requested information.

See attached one page

(E)

I further certify that all contributions received during the period covered by this financial statement have been reported above in Section C or Section D or both, and that the total amount of all such contributions

71,161.03



DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
5/16/78	Expenses - Wash. dinner for Sen. Byrd, Jewell Bailey	2106 Kanawha Blvd. E. Charleston, WV	\$ 44.00
5/16/78	Jewell Bailey, Payroll	1923 Hudson St. Charleston, WV	460.91
5/22/78	Fed. Tax Deposit National Bank of Commerce	Charleston, WV	350.00
5/22/78	W. Va. State Tax Dept. Withholding - Income	State Capitol Charleston, WV	28.38
5/23/78	Kanawha Valley Restaurant Ser. Office coffee and supplies	2909 Fourth Ave. Charleston, WV	46.56
5/17/78	Piedmont Airlines to Washington, DC	Airport Charleston, WV	176.00
5/24/78	Quick Copy News release duplicating	Capitol St. & Lee St. Charleston, WV	5.67
5/31/78	Jewell Bailey, Payroll	1923 Hudson St. Charleston, WV	460.91
Any additional pages needed for other expenditures must include all of the above requested information.			sub-total 1,572.43
See attached 8 pages			TOTAL \$ 60,721.47

(G)

I further certify that this statement lists all financial transactions, as reported above in Sections C, D, and E, for the period beginning on the 10th day of May, 19 78, and ending on the 29th day of October, 19 78.

(H)

I further certify that the total expenditure for the nomination, election or defeat of my candidacy (or any party or organization advocating or opposing the nomination, election or defeat of any candidate), or the passage or defeat of any issue, thing or item to be voted upon, in whose behalf an expenditure was made or a contribution was given for the Election is \$ 60,721.47  
(This total includes all expenditures made as of the date of this statement, including all expenditures previously reported in other statements.)

### OATH OR AFFIRMATION

State of West Virginia

County of Kanawha, ss.

Robert J. Buckle

being duly sworn, deposes and says that the foregoing is a true and correct statement, to the best of his knowledge and belief, of all financial transactions occurring within the period covered by this statement.

*Robert J. Buckle*  
Signature of Candidate, Agent, or Treasurer

Subscribed and sworn to before me this 2nd day of November, 19 78

Notary Public

Commission expires on the 17th day of January, 19 85

	NAME OF CONTRIBUTOR (Print, in full)	ADDRESS AND CITY, STATE AND ZIP	OCCUPATION	AMOUNT
8/19/78	Kenneth R. Douglass	13 136th Street Chesapeake, W. Va.	Asst. Police Chief	300.00
	Richard T. Douglass	Pensacola, Fl.	Businessman	300.00
	Swansey Evans nmi	Box 1495 Logan, W. Va.	Supervisor Dept. of Agri.	1,000.00
	Lucian Fry nmi	East Lynn, W. Va.	Banker Wayne, W. Va.	350.00
	R. W. Hancock III	P.O. Box 927 Morgantown, W. Va.	Heavy Equipment Sales	375.00
	F. R. Lavendar, Sr.	20 138th St. Chesapeake, W.Va.	Retired	300.00
	Jack B. Lavendar	20 138th St. Chesapeake, W.Va.	Investigator A.B.C. Comm.	600.00
	Ralph F. LePore	22 Hamilton Ave. Wheeling, W. Va.	Retired	750.00
	J. R. Nalle,	Surface Street East Bank, W. Va.	Retired	300.00
	L. Kim O'Neal	Fayetteville, W.Va.	Businessman	300.00
	Charles M. Polan, Jr.	P.O. Box 637 Huntington, W.Va.	Real Estate	300.00
	John Protan nmi	P.O. Box 82 Sylvester, W. Va.	Sheriff	850.00
	Nick Joe Rahall	1801 Harper Road Beckley, W. Va.	Congressman	300.00
	John D. Rockefeller IV	State Capitol Charleston, W.Va.	Governor of West Virginia	500.00
	Sharon P. Rockefeller	Governor's Mansion Charleston, W.Va.	First Lady of West Virginia	1,000.00
	Hulett C. Smith	Harper Road Beckley, W. Va.	Insurance	400.00
	Alan L. Susan	P.O. Box 1005 Beckley, W. Va.	Banker	400.00
	Mrs. Katharine B. Tierney	625 Mountain View Ave. Bluefield, W.Va.	Housewife	300.00
	Woodrow Trent nmi	Box 298 Laager, W. Va.	Mine Operator Long Pole, W.Va.	400.00
	United Mine Workers- Political Action Com.	U.M.W. Bldg. Washington, D. C.	labor	400.00
	W.Va. Com. on Political Action - AMT-CIO	Stanley Bldg. Charleston, West Va.	labor	450.00
	E. F. West	66 Express St. Buckhannon, W. Va.	Car salesman	300.00

CONFIDENTIAL - THESE ARE THE NAMES OF THE PERSONS WHOSE NAMES ARE ON THE LIST

DATE OF BIRTH	NAME OF CONTRIBUTOR	AMOUNT	DATE OF BIRTH	NAME OF CONTRIBUTOR	AMOUNT
MM/DD/YY	First, M.I., Last		MM/DD/YY	First, M.I., Last	
8/19/78	Paul H. Anderson	25.00		Arvist F. Andrick	25.00
	Ronald F. Anello	100.00		Albert Anson, Jr., nmi	25.00
	Michael R. Arbogast	25.00		Forrest Armentrout A.	100.00
	Melvin G. Armentrout	25.00		Sue Armentrout nmi	25.00
	G. E. Arnold	100.00		John Arthur nmi	50.00
	Nick Arvon nmi	25.00		James M. Ashley	25.00
	Robert J. Atkins	100.00		Sallie Atkins nmi	55.00
	Louis Averson nmi	50.00		Encil Bailey nmi	50.00
	Everett Bailey nmi	25.00		Everette K. Bailey	25.00
	Faye Bailey nmi	25.00		Gene W. Bailey	25.00
	Gregory W. Bailey	25.00		Lynn Bailey NMI	25.00
	R. Lane Bailey	25.00		Larrie Bailey nmi	50.00
	Larry D. Bailey	25.00		Troy S. Bailey	100.00
	Jack A. Baldine	100.00		Wallace R. Bailey	50.00
	James T. Baldwin	50.00		Arthur K. Banks	100.00
	Icie Barba nmi	25.00		Clyde A. Bare, Jr.	50.00
	Clifford E. Bargeloh	25.00		Joe Barker nm i	25.00
	Lawrence W. Barker	100.00		Jerry S. Barnes	20.00
	Arthur R. Barthelmess	200.00		B. Randall Barton	50.00
	Eileen Basil nmi	25.00		Robert W. Basil	25.00
	Dominick Basile nmi	50.00		Betty L. Batusic	50.00
	Donna M. Bayes	25.00		Harry C. Beale	50.00
	Worth C. Beall	25.00		Carl G. Beard II	100.00
	James W. Beaghley	25.00		A. J. Belcher	25.00
	B. E. Belcher	50.00		Mrs. Ed P. Belcher	25.00
	J. R. Belcher	25.00		James Belcher nmi	25.00
	Harry Bell, Jr. nmi	25.00		Betty K. Bennett	25.00
	Homer L. Bennett	25.00		Norward Bentley nmi	100.00
	Berkley Co. Dam. Women	10.00		Cheryl A. Bergstrom	100.00
	Pete Berl nmi	25.00		Thornton G. Berry, Jr.	200.00
	Woodrow H. Berry	25.00		Estil L. Bevins	25.00
	Donald K. Bischoff	25.00		Patrick B. Boggs	25.00
	Leno S. Bouchian	25.00		Charlotte C. Braun	50.00
	B. Rodney Bupp, Sr.	12.50		Nancy K. Buntsett	25.00
	Evelyn M. Buser	50.00		Henry C. Blas, Jr.	25.00

CONFIDENTIAL

# 3 1 0 1 0 1 1 1 3 MONTHLY CONTRIBUTIONS TO THE UNITED METHODIST CHURCH - EQUAL STAFF OR LESS

DATE TIME	NAME OF CONTRIBUTOR (First, M., Last)	AMOUNT	DATE TIME	NAME OF CONTRIBUTOR (First, M., Last)	AMOUNT
8/19/78	James A. Ribby	25.00	8/19/78	H. F. Rickel	50.00
	Henry C. Blas, Jr.	25.00		Susannah B. Bittinger	100.00
	James R. Blake	25.00		P. Lee Blackhurst	100.00
	George D. Blizzard II	100.00		Jean D. Block	200.00
	Raymond O. Blume	25.00		A. Alan Bober	50.00
	Charles H. Bockway	25.00		Donald Boggess	50.00
	Robert L. Boggs	25.00		C. Dennis Booth	200.00
	Dixie L. Borton	100.00		Colen P. Bowen	25.00
	Etta M. Dowers	50.00		Richard R. Bowers	25.00
	George R. Bowling	25.00		Ray Bragg rmi	25.00
	Ray R. Bragg	75.00		James E. Brandon	25.00
	Curtis Brannon	100.00		Mary Anne Briggs	25.00
	Danny Broom rmi	50.00		Edward A. Broome	50.00
	Charles G. Brown	125.00		Chauncey H. Browning	200.00
	Margaret J. Bruffey	50.00		James N. Bryan	100.00
	Ronald G. Bryant	25.00		Debbie Buchanan rmi	25.00
	Polly Buckingham (M. B.)	50.00		Junior Bugg rmi	25.00
	David A. Bunn	100.00		W. E. Burchett	100.00
	Marjorie H. Burke	200.00		Patricia L. Burns	100.00
	Farris H. Burton	25.00		Jeanne A. Burton	25.00
	John W. Burton	200.00		Ronzel H. Burton	50.00
	J. Gordon Butterfield	50.00		Donnie Byrd rmi	50.00
	James F. Cain	25.00		Mrs. Charles P. Caldwell	25.00
	David C. Callahan	100.00		Basil A. Callen	50.00
	Newton W. Campbell	100.00		John A. Canfield	25.00
	W. Gaston Caperton	100.00		John S. Coplinger	100.00
	Corrine Caren rmi	100.00		George E. Carenbauer	100.00
	W. W. Carlile	25.00		Ruth C. Carnes	50.00
	Grover Carpenter, Sr. rmi	100.00		George Carroll	50.00
	Ben Carr rmi	50.00		Thomas H. Carroll	50.00
	William F. Carroll	25.00		Mrs. Tom T. Carter	25.00
	T. L. Carter	25.00		Tom T. Carter	25.00
	Fred/Cason	200.00		Loren R. Castleberry	200.00
	Ollie D. Casto	25.00		Mrs. Robt. G. Casto	25.00
	J. D. Catalano	100.00		Earl W. Catlett	25.00



MEMBERSHIP AND CONTRIBUTION RECORDS

DATE OF ENTRY	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
8/19/78	Howard H. Clark	50.00	8/19/78	Charles Clonche nmi	100.00
	James T. Clark	50.00		Ray A. Crockett	25.00
	Cerald L. Chafin	100.00		Vincent V. Chaney	150.00
	Tennys W. Cheatwood	25.00		Arthur J. Chestnut	25.00
	Bethel J. Childers	25.00		John Chuchiak, Jr. nmi	75.00
	Michael G. Clagett	25.00		Jo Carol Clark	25.00
	Mrs. R. F. Clark	25.00		R. Forrest Clark	25.00
	Bob Clarke nmi	50.00		Doug Clarke nmi	50.00
	Michael W. Cobb	25.00		Charles C. Coffman	25.00
	O. R. Colan	200.00		Marshall N. Colebank	50.00
	James U. Colombo	100.00		Edna B. Comer	25.00
	Edwin D. Cook	50.00		Stephen L. Cook	100.00
	Phyllis J. Conklin	50.00		Bobby Joe Cooper	50.00
	Ennio J. Corte	75.00		Gloria E. Counts	25.00
	Samuel C. Courtney	50.00		Dennis O. Cottrill	25.00
	Frank L. Cottrill, Jr.	100.00		J. E. Cox	50.00
	Paul L. Crabtree	100.00		Warren E. Craddock	50.00
	William B. Criado	50.00		Kenneth Critchfield nmi	25.00
	Eugene Crutchfield, E	50.00		Piff Cruse nmi	50.00
	W. T. Cruze	50.00		David M. Cutlip	50.00
	Charles H. Dameron	100.00		Carl R. Daniel, Jr.	50.00
	Richard W. Davis	25.00		William M. Davis	100.00
	Gloria V. Davoli	100.00		Hope T. Dawkins	12.50
	Hobart Day nmi	25.00		Miles E. Dean	100.00
	Angelo Deiricqi nmi	25.00		Daniel B. Denning	25.00
	M. G. Dearborn	200.00		Brady Debrular nmi	25.00
	Noah Dell'Orso	125.00		Frances Jean Dempsey	25.00
	Mrs. J. Raymond DePaulo	50.00		Vinson T.E. DeVilbiss	25.00
	Bobby Dial nmi	50.00		Robert Digges, jr. nmi	25.00
	Betty L. Divita	100.00		Mary B. Dixon	100.00
	Milton L. Dinoff	25.00		William A. Dockl	50.00
	John F. Dolan	50.00		Ruth M. Dole	25.00
	Mrs. O. E. Donaldson	125.00		James M. Donohoe	25.00
	Curtis Dotson nmi	125.00		D. Royal Dotson, Jr.	25.00
	Danina B. Dotson	25.00		Opal B. Dotson	25.00

CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$750 OR LESS

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
8/19/78	Hallie J. Douglass	200.00	8/19/78	Eli Dragisick	100.00
	Donald G. Drain	75.00		Kenneth M. Dunn	200.00
	Betty Lee Dye	200.00		Robert S. Earle	25.00
	Richard L. Earles	25.00		Betty J. Easter	25.00
	Ellars, Virginia Mae	25.00		Dimple Ellis NMI	25.00
	Ermal E. Ellis	25.00		Frank M. Ellison	125.00
	Nancy Eplin NMI	50.00		C. O Erickson	100.00
	Charles F. Erickson	50.00		Arnanson Evans NMI	25.00
	Bob Evans NMI	25.00		Clifford Evans NMI	25.00
	Ira Evans NMI	25.00		Leslie L. Evans	25.00
	Facemire Brothers & Co.	125.00		Eugene Facemire NMI	100.00
	James W. Facemire	50.00		Raymon D. Fallen	25.00
	Albert Falvo NMI	175.00		George E. Farley	50.00
	Constance J. Farris	100.00		John E. Faulconer	100.00
	Norman L. Fagan	50.00		S. John Fragale	50.00
	John C. Fealy	25.00		Fred H. Ferguson	25.00
	Bernard Ferrell NMI	50.00		Wirt Ferrell	50.00
	Fields, Tim W.	50.00		Lee Craner Fittro	25.00
	Hugh C. Flaherty	200.00		Terrence R. Flaherty	25.00
	George W. Fleshman	50.00		Robert C. Fleshman	75.00
	E. S. Frame III	25.00		F. F. Flint	25.00
	Barbara Fruth NMI	25.00		Jack Fruth NMI	25.00
	S. John Fragale	50.00		Drexell Frame	50.00
	Billy M. Frame	25.00		Ralph A. Frame, Sr.	50.00
	Robert E. Frame	5.00		Grace Freshour NMI	25.00
	Jack O. Friedman	200.00		Carl E. Gainer	50.00
	Glen B. Gainer	50.00		Glen B. Gainer, Jr.	100.00
	J. K. Callahan	50.00		S. H. Galperin	200.00
	Kenneth Gardner NMI	25.00		Mary Lou Gardner	25.00
	Mrs. Robert H. Garrett	25.00		Kyle Garretson NMI	25.00
	Phillip D. Garjot	100.00		Frank Gaylock Jr. NMI	25.00
	Frederic J. George	50.00		Agnes T. Cessell	25.00
	James J. Gessler	125.00		Ann H. Giacomario	25.00
	Ann H. Giacomario	25.00		Elmer Gibson NMI	50.00

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DATE	NAME OF CONTRIBUTOR (Last, M., and Initial)	AMOUNT	DATE	NAME OF CONTRIBUTOR (Last, M., and Initial)	AMOUNT
8/19/78	Eugene Gibson NMI	\$ 25.00	8/19/78	Judy Gibson	\$ 25.00
	Linda L. Gibson	25.00		W. B. Gibson	125.00
	Ernest H. Gilbert	100.00		Walter Gilbertson	25.00
	Elizabeth S. Gill	50.00		Wm. H. Gillespie	100.00
	Leon H. Ginsberg	200.00		Newman M. Goldston	50.00
	Anthony P. Gonzalez	50.00		K. M. Griffith	50.00
	W. R. Goe	125.00		Sandra G. Goodwin	50.00
	Thomas R. Goodwin	200.00		Bernard Gottlieb NMI	100.00
	Richard E. Gottlieb	25.00		John S. Governor, IV	100.00
	Jerome R. Graham	125.00		Ben Greene NMI	200.00
	Gary L. Greeson	25.00		Carolyn Grove	25.00
	Carolee Gum NMI	50.00		Mary Ann Gum	50.00
	George Haddad NMI	50.00		Edward J. Hafer, Jr.	100.00
	Clyde W. Gagedarb	25.00		Lawrence J. Haggerty	50.00
	V. Odell Haines	25.00		D. Hale NMI	25.00
	James J. Haley	50.00		Jack E. Hall	100.00
	Norman S. Halliday	100.00		Ted Halstead	50.00
	Miriam A. Hamblin	25.00		Larry and Judith Hamrick NMI	200.00
	William K. Hamilton	100.00		Cletus B. Hanley	100.00
	Homer W. Hanna, Jr.	200.00		Howard C. Hardesty	50.00
	Herna Hanshaw NMI	25.00		David C. Hardesty, Jr.	100.00
	Richard E. Hardison	25.00		John Harman	25.00
	Corlis W. Harris	200.00		Elizabeth W. Harris	200.00
	Ethel Hartley NMI	25.00		Victor Hartley NMI	25.00
	Henrietta H. Hartman	200.00		Patricia O. Hartman	50.00
	Eldon J. Haught	100.00		Mrs. Wm. D. Hawley	25.00
	Sharon Gay Hayden	200.00		Wesley F. Hayden	25.00
	James R. Hayes	25.00		Clifford Haynes NMI	50.00
	Alfred K. Hays	25.00		Bernard R. Hays	200.00
	C. B. Holley	25.00		D. Fred Heater	25.00
	Mary Alice Heddlestick	100.00		R. Ray Heddlestick	25.00
	Paula Hedrick NMI	25.00		Helen D. Hedrick	25.00
	Thomas Hedrick NMI	125.00		Virgil Hedrick NMI	50.00
	Mrs. Bonnie Hefer	50.00		Watt W. Helnick	50.00

CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$500 OR LESS

DATE OF GIFT	NAME OF CONTRIBUTOR FIRM, M. L. LAST	AMOUNT	DATE OF GIFT	NAME OF CONTRIBUTOR FIRM, M. L. LAST	AMOUNT
8/19/78	Aubrey Hendricks NMI	25.00	8/19/78	James Hendricks NMI	25.00
	Hazel Hendricks NMI	25.00		Thomas M. Hennessy	25.00
	Randall G. Henry	25.00		John Hensley NMI	50.00
	Mrs. Robert W. Hensley	50.00		Sarah A. Hensley	25.00
	Stephen D. Herndon	50.00		Linda L. Hershberger	25.00
	Neil E. Hewitt	25.00		Grace Hickman NMI	25.00
	Paul Hinkle	25.00		Louise B. Hogan	25.00
	Gary Hoke NMI	25.00		Ray Holbert	50.00
	Walter A. Holden	100.00		Alan P. Holmes	200.00
	Robert E. Holroyd	200.00		Morris M. Horton	100.00
	Blanche C. Hoover	25.00		James B. Hoover	25.00
	Margaret C. Horn	25.00		Echaed Horton NMI	25.00
	D. R. Hostietle	50.00		Stanley M. Hostler	200.00
	Mrs. John E. Howell	25.00		John E. Howell	25.00
	Robert P. Howell	25.00		Eugene Hoyer	200.00
	Fred W. Huddleston	25.00		Barbara Huffman NMI	25.00
	J. C. Huffman	100.00		Odell H. Huffman	50.00
	Robert B. Huffman	25.00		Troy Huffman	25.00
	J. Steven Hunter	50.00		John G. Hutchinson	200.00
	Nancy Hypes NMI	25.00		Charles L. Ihlenfeld	200.00
	Cynthia L. Ikner	25.00		Walter R. Imler	100.00
	Russell L. Isaacs	200.00		Diana Isado NMI	50.00
	Patricia S. Ivey	25.00		O. E. Jack	25.00
	Jimmy F. Jackson	100.00		Robert W. Jackson	50.00
	Lloyd G. Jackson	250.00		Barbara J. Jennings	25.00
	Louis J. John	200.00		George Johnson NMI	25.00
	Keith Johnson NMI	25.00		Mack L. Johnson	200.00
	Nucgikas W. Johnson	25.00		Phillip Johnson	25.00
	Rady A. Johnson	50.00		Ruth Johnson NMI	25.00
	William H. Johnson	25.00		Margie S. Johnston	25.00
	Frank E. Jolliffe	100.00		H. Alva Jones, Jr.	100.00
	Charles T. Jones	50.00		James E. Jones	25.00
	Robert H. Jones	25.00		Sandy Joseph NMI	50.00

DATE	NAME OF CONTRIBUTOR (PRINTED NAME)	AMOUNT	DATE	NAME OF CONTRIBUTOR (PRINTED NAME)	AMOUNT
3/19/78	Melvin W. Kahle, Jr.	200.00	8/19/78	Gabriel G. Kalafat	25.00
	Marianne Kapinos NMI	50.00		J. M. Kass, Jr.	50.00
	Jo Ann Keister	50.00		Earl K. Kelley	25.00
	George D. Kemper	25.00		Mrs. Geo. D. Kemper	25.00
	Richard A. Kennedy	25.00		Dennis O. Kernes	50.00
	Katherine A. Ketchum	100.00		Gary C. Keys	50.00
	Kent T. Keyser	25.00		Vaughn L. Kiger	50.00
	Harry N. Kilmer	100.00		Norman L. Kilpatrick	50.00
	E. R. Kincaid	25.00		E. Robert Kincaid	25.00
	Hugh A Kincaid	100.00		Kyle King NMI	25.00
	Ruth Kingery NMI	25.00		Matthew M. Kinsolving	25.00
	Karen Kirby NMI	50.00		Richard Kirby	50.00
	Elizabeth L. Kisner	50.00		Anna F. Krajc	25.00
	Frank C. Krajc	25.00		Karen E. Krajc	25.00
	Mrs. Wm. F. Krieg	25.00		Rex L. Kuhl	10.00
	Jack Kyle	50.00		Albert J. Lane	50.00
	T. L. LaNeve	125.00		Richard D. Ladd	200.00
	George E. Lantz	25.00		James D. LaRosa	100.00
	Fred Larzo NMI	50.00		L.C.L. Lavender	100.00
	Betty Lawrence NMI	25.00		Cora Lawson	25.00
	Nicholas Lazaris	50.00		Norlene L. Leach	25.00
	H. E. Legg	25.00		Thomas B. Legg	25.00
	W. E. Lemon	50.00		Mrs. John M. Lesner	10.00
	B. R. Lester	25.00		Charles S. Lewis, Jr.	100.00
	E. E. Lewis	50.00		Mrs. Thos. B. Leww	25.00
	Betty Stone Light	200.00		L. E. Lilly	125.00
	Catherine A. Linger	75.00		Samuel A. Linger	25.00
	Ann Livesay NMI	50.00		Rosezetta Lloyd NMI	50.00
	Charles E. Lohr	200.00		Frank R. Looman	50.00
	Tony Lopez	50.00		J. R. Iosh	50.00
	Albert D. Loundman	100.00		Mrs. C. L. Lowe	25.00
	Charles M. Love	100.00		Jane Lovell	25.00
	Stephen Lovell	25.00		Chester Lovett	100.00

Date	Name	Amount	Date	Name	Amount
2/19/73	Madden, John T.	50.00	8/19/73	Maddy, James D.	100.00
	Magnuson, R. E.	100.00		Maloney, Melton M.	25.00
	Mandeville, C.C.	75.00		Mansour's Food Mkt.	50.00
	Manypenny, Mrs.				
	Joseph H.	100.00		Margolis, Newton	50.00
	Marlowe, Michael J.	25.00		Marshall, Dan A.	50.00
	Marshall, Max L.	125.00		Martin, J. B.	100.00
	Martin, Ralph W.	50.00		Maruish, Peter J.	25.00
	Mason, Thomas L.	5.00		Massey, Herbert NMI	50.00
	Mathias, Thomas W.	100.00		Matthews, Virgil E.	75.00
	Maxwell, Wm. B. III	100.00		McBrayer, Ruth NMI	25.00
	McCabe, Brooks F, Jr	25.00		McCallister, Elmer C.	25.00
	McCann, Charles NMI	25.00		McClanahan, J.F.	200.00
	McClanahan, Lois M.	25.00		McClausland, George	25.00
	McClausland, Margie				
	NMI	25.00		McClintic, Charles E.	25.00
	McConnell, J. Knox	50.00		McCoy, Ira NMI	200.00
	McCloud, Verneeda B	75.00		McClung, Jack C.	25.00
	McComas, Mary E.	25.00		McCulloch, Thomas M.	100.00
	McCullough, F.W.	100.00		McDavid, Carter	25.00
	McDonald, Charles B.	12.50		McDonald, Dan NMI	100.00
	McElwee, Charles R.	100.00		McGee, Thomas L.	50.00
	McGraw, Darrell V, Jr.	100.00		McGraw, Ruth F.	100.00
	McIntyre, James B.	25.00		McManus, Lewis N.	100.00
	McVey, Everett NMI	100.00		McWhorten, H.R.	100.00
	Meadows, Edna NMI	35.00		Meadows, Francis NMI	25.00
	Meadows, Mrs. Lucile S	25.00		Meadows, Mike NMI	25.00
	Mellow, Ernest W.	25.00		Metzgar, James K.	25.00
	Michael, Minnie NMI	25.00		Michael, M. Blane	200.00
	Mick, Larry H.	25.00		Miller, Alan R.	25.00
	Miller, Charles E.	50.00		Miller, Charles Lloyd	100.00
	Miller, Joe E.	200.00		Miller, Raymond D.	25.00
	Miller, Robert F.	200.00		Miller, Sharrell NMI	25.00
	Miller, Thomas B.	50.00		Miller, Walter N.	200.00



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 10. PAYMENTS TO THE AMERICAN LUTE CONTINUATION OF EQUAL SIZED OR LESS

DATE	NAME OF CONTRIBUTOR	AMOUNT	DATE	NAME OF CONTRIBUTOR	AMOUNT
8/17/72	Millex, William C.	100.00	8/17/72	Mills, Barbara J.	25.00
	Mills, Hugh H.	100.00		Mills, Lewis G.	25.00
	Milstead, Ann L.	100.00		Mitchell, George H.	50.00
	Mollohan, Paul S.	25.00		Mollohan, Robert H.	100.00
	Moon, James C.	100.00		Mooney, E.G., H.F., Jr.	200.00
	Moore, Avis S.	25.00		Moore, Barbara NMI	25.00
	Moore, Cecil B, Jr.	25.00		Moore, Kathy G.	200.00
	Moreland, William A.	50.00		Morgan, Glen D.	25.00
	Mork, John L.	50.00		Morris, I.L.	100.00
	Morris, James V.	100.00		Morris, Virgil S.	25.00
	Morrow, John W.	25.00		Morton, James H.	100.00
	Morton, James P.	50.00		Morton, Paul NMI	150.00
	Moss, Warren H.	100.00		Moyer, Martha A.	200.00
	Mullenax, John W.	100.00		Mullens, John W.	50.00
	Mullins, Donald NMI	25.00		Mulroy, Robert J.	50.00
	Murad, George R.	100.00		Murphy, Mary R.	25.00
	Myers, Andy NMI	50.00		Myers, Lloyd L.	25.00
	Myers, Ray E.	100.00		Nalle, J. W.	100.00
	Narick, Steven D.	100.00		Naseef, Charles J.Sr.	50.00
	Nasser, Myrna G.	25.00		Neal, Sarah L.	25.00
	Neely, Betty H.	25.00		Nibert, G. B.	25.00
	Nichols, J. Pat	25.00		Nisbet, Wallace NMI	25.00
	Njaka, Thelma D.	25.00		Norris, Ricki L.	25.00
	Nunnery, Mrs. Larry E.	50.00		Nutter, Joseph E.	25.00
	O'Brien, Mary M.	25.00		O'Brien, Mildred E.	25.00
	O'Brien, William L.	50.00		O'Brien, William T.	50.00
	O'Dell, Sherri A.	25.00		Ohio Co. Dem. Exec. Cm.	50.00
	O'Neal, Dave NMI	75.00		Orndorff, A. W.	100.00
	Palumbo, Mario J.	100.00		Page, James NMI	25.00
	Parker, Frederick L.	25.00		Parker, Judith H.	50.00
	Parr, John W.	25.00		Parsons, James F.	50.00
	Parsons, Paul NMI	50.00		Paspos, Andy NMI	50.00
	Patterson, Okey L.	200.00		Paul, Freda Noble	200.00
	Paulay, Boyd D.	25.00		Paulay, Herb L.	25.00

CONTRIBUTORS WHOSE AGES, DATE CONTRIBUTIONS TOTAL LESS 100.00

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
3/12/73	Pauley, Marie E.	25.00	8/19/73	Payne, Eugene	25.00
	Payne, Norma L.	25.00		Pennington, Emma L.	25.00
	Pensabene, D. V.	50.00		Perdue, Robin L.	25.00
	Perkins, J. Carter	50.00		Perry, W. C.	100.00
	Person, Robert L.	100.00		Pete, William L.	25.00
	Peters, Bob NMI	50.00		Peters, Esther NMI	25.00
	Petrolo, Anthony J.	25.00		Pickett, George E.	200.00
	Pitts, Clarence J.	25.00		Prendergast, Thomas M.	50.00
	Prezioso, Marie L.	25.00		Pullen, Mrs. S. L.	100.00
	Reed, Mrs. William D.	25.00		Piercy, Sara B.	25.00
	Polan, William J. H.	200.00		Pollitt, Robert D.	25.00
	Poole, George D., Jr.	25.00		Post, Robert Roy	25.00
	Potts, Ira NMI	25.00		Potts, Jewell NMI	25.00
	Powell, Lawrence NMI	25.00		Powell, Robert W.	200.00
	Powers, Clara NMI	25.00		Powers, Frank NMI	50.00
	Powers, Robert NMI	25.00		Price, B. C.	50.00
	Pridemore, Helen W.	12.50		Prichard, Robert L.	25.00
	Prodan, John M.	50.00		Prudich, Joseph J.	25.00
	Purinton, John B.	25.00		Rafferty, Edith A.	25.00
	Rafferty, Victor J.	25.00		Ragimo, Fernandico B.	25.00
	Rahall, Nick Joe II	200.00		Randolph, James R.	25.00
	Randolph, Jennings NMI	25.00		Rayburn, Dana G.	25.00
	Reed, Jon Anthony	75.00		Reed, Robert NMI	25.00
	Reese, Juanita G.	50.00		Renstrom, Gordon E.	12.50
	Richardson, Sally K.	100.00		Riggleman, Leldon M.	25.00
	Riggs, David B.	50.00		Rinchart, Mary L.	25.00
	Roberts, Mrs. Belford NMI	200.00		Robertson, Roy A.	50.00
	Rollyson, William R.	25.00		Ronning, Lawrence M.	50.00
	Rorta, Nora E.	50.00		Rose, Herschel NMI	100.00
	Roy, Jesse J.	25.00		Rudman, Sharri L.	25.00
	Russell, Franklin D.	25.00		Russo, James J.	25.00
	Ruth, P. Wiley	100.00		Rutledge, Phyllis J.	100.00
	Sargent, Stella A.	25.00		Sattos, P. Lyle	50.00
	Saulton, Ruth H.	25.00		Saunders, John W.	100.00



CONTRIBUTORS WHOSE ACTING DATE CONTRIBUTIONS EQUAL \$25.00 OR LESS

DATE OF ACTING	NAME OF CONTRIBUTOR (Print, M. & Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (Print, M. & Last)	AMOUNT
8/17/78	Savilla, Roland	50.00	8/17/78	Scarberry, Shirley L.	25.00
	Schafer, John H.	50.00		Schaub, C. Robert	50.00
	Scheirman, Joe E. III	25.00		Schreiber, Robert J.	25.00
	Schulte, Clemet L.	200.00		Schultz, Mrs. Dorey E.	25.00
	Schweizer, Frances S.	25.00		Scott, Paul J.	25.00
	Segal, George S.	100.00		Sergent, W. D.	25.00
	Serpe, Michael E.	25.00		Sevy, William R.	25.00
	Sharp, Jane F.	25.00		Shaw, Richard G.	100.00
	Shearer, Ruth P.	250.00		Shepard, Frank NMI	25.00
	Sherman, Jerry	25.00		Shingleton, W. E.	100.00
	Simon, Dorothy M.	50.00		Skidmore, Ruby K.	25.00
	Sibold, Clara L.	25.00		Sidebottom, Howard NMI	25.00
	Sidebottom, Mike	25.00		Siegworth, Fred S.	25.00
	Simons, E. R.	25.00		Simpson, Donald J.	25.00
	Sims, Juanita Rexrode	100.00		Skelton, Mrs. Jack R.	50.00
	Slater, Kenneth NMI	50.00		Smaidi, Bill (NMI)	50.00
	Smidi, Bill NMI	50.00		Smith, Billy Joe	25.00
	Smith, Charles S.	100.00		Smith, Charles NMI	25.00
	Smith, Dorothy T.	25.00		Smith, Guy Ross	200.00
	Smith, Homer NMI	25.00		Smith, R. Gary	25.00
	Smith, Howard R.	50.00		Smith, I. N.	150.00
	Smith, Marion E.	25.00		Smithers, C. E.	50.00
	Snead, Billy G.	25.00		Snyder, Carolyn M.	100.00
	Snelson, Thomas P.	25.00		Snyder, John M.	25.00
	Solomon, David L.	50.00		Somerville, Paul R, Jr.	10.00
	Sommers, Peter NMI	25.00		Sommers, Jo Ann	25.00
	Sowards, Chris K.	50.00		Spangler, Ben NMI	100.00
	Sparks, Bessie D.	100.00		Spears, Lawrence E.	100.00
	Spencer, James T.	50.00		Sprouse, James M.	100.00
	Stalnaker, Daril NMI	25.00		Stanley, Spiro C.	50.00
	Stanley, William A.	45.50		Starcher, Rex NMI	25.00
	St. Clair, Gary L.	25.00		Sheets, Philip J.	50.00
	Staggers, Harley O.	50.00		Stalnaker, Larry W.	25.00

## DONATIONS RECEIVED FROM 1978 TO 1979 (TOTAL \$750.00 OR LESS)

DATE	NAME OF DONOR (Last, First, Middle)	AMOUNT	DATE	NAME OF DONOR (Last, First, Middle)	AMOUNT
8/19/78	Staples, Douglas M.	100.00	8/19/78	Starcher, Andy	50.00
	Starcher, Wavie M.	100.00		Steele, Thomas J.	25.00
	Steptoe, Robert M.	50.00		Stern, Julius Jay	200.00
	Stevens, Thomas J.	100.00		Stine, Paul B.	25.00
	Stokes, George W.	25.00		Stone, Riley V.	25.00
	Stout, Perry G.	25.00		Stowers, Lyle NMI	25.00
	Stowers, Wylie NMI	125.00		Stuart, Lucille W.	25.00
	Sturgell, Christina S.	100.00		Stutler, Timothy J.	50.00
	Sullivan, Willard W, Jr.	100.00		Summers, Albert T.	50.00
	Sunderland, Betty B.	10.00		Sweeney, M. F.	25.00
	Tabb, Lyle C.	25.00		Talbott, R. K.	100.00
	Tanner, Douglas H.	25.00		Tanzey, Gene A.	50.00
	Tarron, Michael B.	25.00		Taylor, Albert Z.	50.00
	Taylor, Hubert T.	50.00		Taylor, L. P.	25.00
	Taylor, Robert R.	25.00		Thaw, William P.	200.00
	Thayer, Ethel W.	25.00		Thomas, Clinton C.	50.00
	Thomas, John J.	50.00		Thomas, Marian Pope	100.00
	Thomas, Layman L.	25.00		Thomas, Lewis P.	75.00
	Thomas, Marvin Doyal	50.00		Thomas, Richard P.	25.00
	Thurman, Frank D.	50.00		Tibbs, Harry G.	100.00
	Tomasky, Michael NMI	125.00		Tomblin, Harold NMI	25.00
	Tompkins, Roger W.	200.00		Toney, W. D.	50.00
	Toothman, Woodrow C.	50.00		Totten, Paul NMI	250.00
	Trail, A. J.	25.00		Triplett, George R.	50.00
	Tucci, Silvio NMI	75.00		Tucker, Larry A.	25.00
	Tuckwiller, Lowell J.	25.00		Turley, J. C. Jr.	200.00
	Twonig, Kevin B.	25.00		United Parcel Service	100.00
	Valentine, Mrs. W. Frank	50.00		Valero, Walter NMI	200.00
	Vandelinde, Mabel NMI	75.00		VanHorn, Robert A.	50.00
	VanTol, Alice C.	100.00		VanMeter, R. Doyle II	100.00
	Varha, B. J.	25.00		Vickers, Earl M.	50.00
	Vinson, Frank M.	25.00		Wagy, Rebecca NMI	25.00
	Walker, Richard NMI	50.00		Walkup, Christopher R.	100.00
	Walker, Mrs. Richard E.	50.00		Wandling, Anne Little	25.00

# 3 1.2 1.2 1.2 1.2 1.2 1.2 CONTRIBUTIONS TO THE 1978-1979 BUDGET

DATE	NAME OF CONTRIBUTOR (Print, M. L., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (Print, M. L., Last)	AMOUNT
8/19/78	Ward, Lafe P.	100.00	8/19/78	Ward, Betty	25.00
	Watson, William E.	100.00		Watts, Geraldine NMI	25.00
	Waybright, James W.	200.00		Weaver, Jack G.	25.00
	Weaver, Robert J.	50.00		Webb, Barbara H.	25.00
	Webb, Harry NMI	25.00		Webster, Buddy L.	25.00
	Weese, Mary M.	50.00		Wehrle, R. S.	200.00
	Weimer, Elizabeth M.	25.00		Wellam, Howard NMI	25.00
	Wellman, David NMI	25.00		Wellman, Dollie J.	25.00
	Wellman, Lester NMI	25.00		Wenger, R. Michael	100.00
	Westfall, Betty J.	50.00		White, Bill NMI	50.00
	White, Clarence E.	50.00		White, Harry NMI	50.00
	White, John S.	50.00		White, Marie NMI	25.00
	White, Phyllis R.	50.00		White, William C.	50.00
	Whitlock, Ernestine NMI	25.00		Whitten, Kenneth NMI	25.00
	Whittington, Cathie D.	25.00		Whited, Mrs. E. L.	25.00
	Wildt, Mac Ellen	25.00		Williams, Harry D.	50.00
	Williams, Raymond NMI	50.00		Williams, Terry A.	25.00
	Williams, W. E.	50.00		Willman, Mrs. K. R.	25.00
	Wilmer, Hope F.	100.00		Wilson, Brian K.	50.00
	Wilson, Georgia NMI	25.00		Wilson, James NMI	25.00
	Wingett, Robert NMI	25.00		Winnell, Henry D.	25.00
	Winnor, Thomas A.	200.00		Womack, John H.	50.00
	Woodall, Murrel NMI	25.00		Wood, Janet White	25.00
	Wood, Mark NMI	25.00		Woodall, Emery NMI	100.00
	Woodrum, Norma C.	25.00		Woofter, Perry W.	25.00
	Word, J. W. Jr.	100.00		Worden, Donza T.	50.00
	Workman, Junior NMI	25.00		Wood, William W.	50.00
	Woodrum, Corbett C.	25.00		Wright, Joni NMI	25.00
	Wynne, John L.	50.00		Wysong, Karen L.	25.00
	Yago, John W.	25.00		Yahn, Robert A.	100.00
	Yanero, Anthony J.	200.00		Yates, John M.	25.00
	Yanero, Felix NMI	200.00		Yerrid, Lester L.	75.00
	Yoak, Don NMI	75.00		Yoak, Mrs. Lveretia NMI	25.00
	Zimmerman, E. G.	200.00			

RECEIVED BY: [redacted] DATE: [redacted] TIME: [redacted]

DATE	NAME OF CONTRIBUTOR	AMOUNT	DATE	NAME OF CONTRIBUTOR	AMOUNT
8/19/78	Dean T. Lowry	25.00	8/19/78	Attilio M. Lucci	75.00
	Dominic Luciano	25.00		Dominic Luciano, Jr.	25.00
	W. E. Lamstrum	25.00		Mrs. Frank U. Lytle	100.00

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
6/1/78	Piedmont Airlines to Washington, D.C.	Airport, Charleston, W.Va.	180.00
6/2/78	Terrace Park East Rent	2106 Kanawha Blvd. E. Charleston, W. Va.	300.00
6/3/78	U.S. Postmaster Stamps	Post Office Charleston, W. Va.	100.00
6/3/78	Three Printers Duplicating	1609 Kanawha Blvd.E. Charleston, W.Va.	39.30
6/5/78	J.C.Dillon, Jr. Wash. hotel reimbursement	2106 Kanawha Blvd. E. Charleston, W. Va.	76.79
6/5/78	Cash- Expenses for D.N.C. meeting in Washington	2106 Kanawha Blvd. E. Charleston, W. Va.	100.00
6/9/78	Lodging, Sheraton Park Hotel	Washington, D. C.	347.00
6/14/78	Lance's Office supplies	812 Quarrier St. Charleston, W. Va.	3.09
6/19/78	J.C.Dillon, Jr. travel reimbursement	2106 Kanawha Blvd. E. Charleston, W. Va.	200.00
6/20/78	Three Printers Printing-Del. Selection	P.O. Box 4403 Charleston, W.Va.	7.29
6/20/78	Harper Picture Framing Office pictures	32 1/2 Capitol St. Charleston, W. Va.	154.50
6/20/78	Payroll-Jewell Bailey	1923 Hudson St. Charleston, W. Va.	460.91
6/26/78	Phillips Restaurant State Comm. Meeting lunch	600 Kanawha Blvd. E. Charleston, W.Va.	824.90
6/26/78	Culf Oil Corp. Traveling	Atlanta, Ga.	78.79
6/27/78	Payroll-Jewell Bailey	1923 Hudson St. Charleston, W. Va.	460.91
7/1/78	Terrace Park East Rent	2106 Kanawha Blvd.E. Charleston, W.Va.	300.00
7/12/78	S. Spencer Moores Office Supplies	Capitol Street Charleston, W. Va.	11.87
7/12/78	Petty Cash - Office	2106 Kanawha Blvd. E. Charleston, W. Va.	50.00
7/13/78	W.Va. State Tax Dept. Income Tax	State Capitol Charleston, W. Va.	56.76
7/13/78	National Bank of Commerce Federal Tax Deposit	Charleston, W. Va.	350.00
7/13/78	C & P. Telephone Co. Service	Charleston, W. Va.	10.00
7/13/78	Blue Cross Hospital Service, Insurance	Commerce Square Charleston, W. Va.	120.34
7/13/78	Kanawha Valley Restaurant Ser. Office Supplies	2909 Fourth Ave. Charleston, W.Va.	41.20



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DATE PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name) RESIDENCE AND MAILING ADDRESS AMOUNT

7/15/78	Dept. Employment Security	State Capitol Charleston, W.Va.	21.60
7/15/78	Payroll-Jewell Bailey	1923 Hudson St. Charleston, W.Va.	460.91
7/15/78	U.S. Postmaster, Stamps	Charleston, W. Va.	30.00
7/13/78	W.Va. Workmen's Comp.	State Capitol Charleston, W. Va.	5.04
7/14/78	National Bank of Comm. Fed. Tax. Deposit	Charleston, W.Va.	274.20
7/25/78	Greyhound Lines, Inc. express delivery	Summers Street Charleston, W. Va.	8.50
7/25/78	Quick Copy Duplicating	Capitol St. Charleston, W. Va.	22.70
7/27/78	C & P Telephone Co. Measured Service	Charleston, W. Va.	554.53
7/28/78	C & P Telephone Co. Regular Service	Charleston, W.Va.	416.61
7/28/78	Jan's Flowers	Washington St., E. Charleston, W. Va.	63.85
7/28/78	Jones Printing Company Office Supplies	Pennsylvania Ave. Charleston, W. Va.	59.54
7/28/78	S. Spencer Moore Co. Office Supplies	Capitol St. Charleston, W. Va.	25.32
7/28/78	Xerox, Corp.	12200 Alameda Dr. Strongsville, Ohio	164.65
7/28/78	Gulf Oil Corp. travel	Atlanta, Ga.	66.58
7/28/78	I.B.M. Corp. Service Contract	Cleveland, Ohio	73.65
7/28/78	Pitney Bowes Office machines	Stanford, Ct.	168.92
7/31/78	Jewell Bailey Retirement fund	1923 Hudson St. Charleston, W.Va.	100.00
7/31/78	payroll-Jewell Bailey	1923 Hudson St. Charleston, W. Va.	460.91
8/1/78	Terrace Park East Rent	2106 Kanawha Blvd. E. Charleston, W. Va.	300.00
8/1/78	C & P Telephone Measured service	Charleston, W. Va.	259.95
8/1/78	Blue Cross Hospital Ser. Insurance	Commerce Square Charleston, West Virginia	60.42
8/7/78	U. S. Postmaster Postage machine	Charleston, W. Va.	100.00
8/12/78	Gulf Oil Corp	Atlanta, Ga.	63.42



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DATE PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name) RESIDENCE AND MAILING ADDRESS AMOUNT

8/12/78	C & P Telephone Co. Reg. Service	Charleston, W. Va.	159.18
8/12/78	C & P. Telephone co Measured Service	Charleston, W. Va.	208.00
8/12/78	Xerox Corp.	Cincinnati, Ohio	159.57
8/12/78	National Bank of Commerce Fed. Tax Deposit	Commerce Square Charleston, W. Va.	400.00
8/12/78	W. Va. State Tax Dept- Income tax withholding	State Capitol Charleston, W. Va.	13.38
8/15/78	Payroll-Jewell Bailey	1923 Hudson St. Charleston, W. Va.	460.91
8/24/78	Kanawha Valley Rest. Office Supplies	Charleston, W. Va.	40.00
8/31/78	Terrace Park East. Rent	2106 Kanawha Blvd. E. Charleston, W. Va.	300.00
8/31/78	Payroll-Jewell Bailey	1923 Hudson St. Charleston, W. Va.	460.91
8/31/78	Jewell Bailey Retirement fund	1923 Hudson St. Charleston, W. Va.	100.00
9/1/78	National Bank of Commerce Fed. Tax Deposit	Commerce Square Charleston, W. Va.	400.00
9/1/78	W. Va. State Tax Dept. Income Tax	State Capitol Charleston, W. Va.	23.38
9/1/78	J. C. Dillon, Jr. Expenses - Clarksburg	2106 Kanawha Blvd. E. Charleston, W. Va.	94.65
9/1/78	Charleston Newspapers	Virginia St. Charleston, W. Va.	8.45
9/1/78	Blue Cross Hospital Ser. Insurance	Commerce Square Charleston, W. Va.	60.42
9/1/78	Jan's Flowers	Washington St., W. Charleston, W. Va.	12.88
9/1/78	Jones Printing Co. Office Supplies	Pennsylvania Ave. Charleston, W. Va.	59.54
9/1/78	Jarrett Printing Co. Office Supplies	Capitol St. Charleston, W. Va.	70.92
9/1/78	I.B.M., Corp. Office Supplies	Cleveland, Ohio	12.31
9/1/78	C & P Telephone Co. Reg. service	Charleston, W. Va.	190.78
9/18/78	Payroll-Jewell Bailey	1923 Hudson St. Charleston, W. Va.	460.91
9/18/78	U. S. Postmaster,	Charleston, W. Va.	115.00
9/20/78	Randolph for Sen. G. M. dinner ticket	Fairmont, W. Va. Treasurer	25.50
9/30/78	Payroll-Jewell Bailey	1923 Hudson St. Charleston, W. Va.	460.91

460.91

NAME OF DONOR  
AND TO WHOM  
(First Name, M. I., Last Name)

RESIDENCE AND MAILING ADDRESS

DATE	NAME OF DONOR AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
10/10/78	Jewell Bailey Bathhouse Fund	1923 Hudson St. Charleston, W. Va.	100.00
10/12/78	Terrace Park East Rent	2106 Kanawha Blvd. E. Charleston, W. Va.	300.00
10/10/78	Manan's Club of Charleston Rental	Virginia St., E. Charleston, W. Va.	100.00
10/12/78	Blue Cross Hospital Ser. Insurance	Commerce Square Charleston, W. Va.	60.41
10/12/78	C & P Telephone Co. Measured Service	Charleston, W. Va.	259.95
10/12/78	C & P Telephone Co. Reg. Service	Charleston, W. Va.	170.00
10/12/78	Gulf Oil Corp. travel	Atlanta, Ga.	64.80
10/12/78	Fraternal Order of Police - Contribution	Charleston, W. Va.	12.50
10/12/78	Xerox, Corp. copies	Cincinnati, Ohio	4.22
10/13/78	Internal Revenue Service Federal Tax	Memphis, Tenn.	174.20
10/15/78	Payroll-Jewell Bailey	1923 Hudson St. Charleston, W. Va.	460.91
10/13/78	General Elec. day expenses The Chairman, Clay Co. Democratic Exec. Comm. Mr. Robert Reed	P.O. Box 228 Clay, W. Va.	200.00
	Doddridge Co. Democratic Executive Comm. Mr. W. E. Williams, Sr. Election expenses	202 Louise Ave. West Union, W. Va.	200.00 - 200.00 # 1714
	General Elec. Expenses Mr. Max Marshall	Sand Fork, W. Va.	200.00 - 200.00 # 1663
	Gen. Election Day Expenses Mr. Richard Mongold Greene Co.	Petersburg, W. Va.	200.00 - 200.00 # 173
	Gen. Election Day Expenses Mr. Guy Long Harrison County	P.O. Box L Moorefield, W. Va.	200.00 - 200.00 # 1667
	Gen. Election Day Expenses Mr. Fred Parker Thomas Co.	Rt. 1, Box 40 Greenville, W. Va.	200.00 - 200.00 # 1663
	Gen. Election Day Expenses Mr. Charles E. Miller, Jr. Wayne County	RFD #1 Berkeley Springs, W. Va.	200.00 - 200.00 # 1667
	Gen. Election Day Expenses Mr. Paul Barton Wayne County	P.O. Box 455 Franklin, W. Va.	200.00 - 200.00 # 1667
	Gen. Election Day Expenses Mr. Bernard Tice Wayne County	Rt. 2 St. Marys, W. Va.	200.00 - 200.00 # 1667
	Gen. Election Day Expenses Mr. Guy Fuller Wayne County	1510 Hantonsville Rd. Murlinton, W. Va.	200.00 - 200.00 # 1667
	Gen. Election Day Expenses Mr. Howard Hume Wayne County	Saltville, W. Va.	200.00 - 200.00 # 1667

NAME AND TO WHOM (Last Name, M. I., and Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT	
Gen. Election Day Expenses Mr. Robert Ammentrout Spencer, W. Va.	211 2nd St. Spencer, W. Va.	200.00	101.50
Gen. Election Day Expenses Mr. Robert Ammentrout Parsons, West Virginia	202 Fourth St. Parsons, West Virginia	200.00	101.50
Gen. Election Day Expenses Mr. Eric Miklas Sistersville, W. Va.	Route 3 Sistersville, W. Va.	200.00	101.50
Gen. Election Day Expenses Mr. L. F. Hartman Buckhannon, W. Va.	P.O. Box 669 Buckhannon, W. Va.	200.00	101.50
Gen. Election Day Expenses Mrs. Augustine Kahan Elizabeth, W. Va.	P.O. Box 158 Elizabeth, W. Va.	200.00	101.50
Gen. Election Day Expenses Mr. David Cain Bigbend, West Virginia	P.O. Box 669 Bigbend, West Virginia	200.00	101.50
Gen. Election Day Expenses Mrs. Anna Mae Murphey Philippi, W. Va.	P.O. Box 222 Philippi, W. Va.	300.00	101.50
Gen. Election Day Expenses Mr. Grode Gess Bunker Hill, W. Va.	Bunker Hill, W. Va.	300.00	101.50
Gen. Election Day Expenses Mr. John Protan Sylvester, West Va.	Sylvester, West Va.	300.00	101.50
Gen. Election Day Expenses Mr. Eugene Facevine Sutton, W. Va.	290 N. Braxton St. Sutton, W. Va.	300.00	101.50
Gen. Election Day Expenses Ms. Mary Ciccololla Follansbee, W. Va.	R 528 Banfield Ave. Follansbee, W. Va.	300.00	101.50
Gen. Election Day Expenses Mr. Chris Walkup White Sulphur Springs, W. Va.	White Sulphur Springs, W. Va.	300.00	101.50
Gen. Election Day Expenses Mr. Vernon Whitacre High View, W. Va.	P.O. Box 5 High View, W. Va.	300.00	101.50
Gen. Election Day Expenses Mr. Eli Dragesich Weirton, W. Va.	100 Powers Road Weirton, W. Va.	300.00	101.50
Gen. Election Day Expenses Mr. Joseph R. Goodwin Ripley, W. Va.	500 Church St. Ripley, W. Va.	300.00	101.50
Gen. Election Day Expenses Mr. Lyle C. Tabb Kearneysville, W. Va.	Route 3, Box 265 Kearneysville, W. Va.	300.00	101.50
Gen. Election Day Expenses Mr. Tom Alfred Weston, West Virginia	Rt. 4, Box 36-10 Weston, West Virginia	300.00	101.50
Gen. Election Day Expenses Mr. Wylie Stowers Hamlin, West Virginia	Rt. 2 Hamlin, West Virginia	300.00	101.50
Gen. Election Day Expenses Mr. James Tennant Moundsville, West Virginia	P.O. Box 617 Moundsville, West Virginia	300.00	101.50
Gen. Election Day Expenses Mr. Forrest Clark Pt. Pleasant, W. Va.	2212 Jackson Avenue Pt. Pleasant, W. Va.	300.00	101.50
Gen. Election Day Expenses Mr. Kenneth V. Ward Keyser, West Virginia	80 Maple Avenue Keyser, West Virginia	300.00	101.50
Gen. Election Day Expenses Mr. Shirley Gullip Craigsville, W. Va.	Craigsville, W. Va.	300.00	101.50
Gen. Election Day Expenses Mr. Robert Cline Bowlingburg, W. Va.	Spring Street Bowlingburg, W. Va.	300.00	101.50



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 ... and ... incurred during the period covered ...

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
10/13/78	Gen. Election Day Expenses Mr. Bill Snyder Putnam County	222 Beechwood Estates Scott Depot, W. Va.	2300.00 - 700.00 CL # 1707
	Gen. Election Day Expenses Mr. Wimpy Valentine Randolph County	Robert Lee Avenue Elkins, West Virginia	300.00 - 500.00 # 1634
	Gen. Election Day Expenses Mr. Gary Deeds Summers County	P.O. Box 106 Jumping Branch, W. Va.	300.00 - 500.00 # 1625
	Gen. Election Day Expenses Mr. C. R. Kinsey Taylor County	Route #3, Box 410 Grafton, W. Va.	300.00 - 500.00 + 1686
	Gen. Election Day Expenses Mr. Lucian Fry Wayne County	P.O. Box 2007 Wayne, West Va.	300.00 - 700.00 # 1703
	Gen. Election Day Expenses Mr. Eugene Goff Webster County	P.O. Box 278 Cowen, W. Va.	300.00 - 700.00 # 1707
	Gen. Election Day Expenses Mr. Gene Wayne Weitzel County	P.O. Box 12 Hastings, W. Va.	300.00 - 200.00 # 1711
	Gen. Election Day Expenses Mr. Bill Bailey Wyoming County	Pineville, W. Va.	300.00 - 700.00 # 1710
	Gen. Election Day Expenses Mr. Robert Nelson Cabell County	P.O. 1965 Huntington, W. Va.	500.00 - 500.00 # 1687
	Gen. Election Day Expenses Mr. Ray A. Goforth Fayette County	P.O. Box 218 Charlton Heights, W. Va.	500.00 - 500.00 # 1688
	Gen. Election Day Expenses Mr. Jim Shaffer Harrison County	230 Maple Ave. Clarksburg, W. Va.	500.00 - 500.00 # 1689
	Gen. Election Day Expenses Mr. William Brotherton Bancroft County	State Capitol Charleston, W. Va.	1,000.00 * (1,000.00)
	Gen. Election Day Expenses Mr. Dominick Romano Marion County	313 Professional Bldg. Faintmont, W. Va.	500.00 - 500.00 + 1690
	Gen. Election Day Expenses Mr. Paige Wooldridge Meigs County	800 Princeton Ave. Bluefield, W. Va.	500.00 - 500.00 + 1691
	Gen. Election Day Expenses Mr. John Hoff Monongalia County	Assessor's Office Morgantown, West Virginia	500.00 - 500.00 + 1692
	Gen. Election Day Expenses Mr. Melvin Kahle, Jr. Ohio County	28 Maple Ave. Wheeling, W. Va.	500.00 - 500.00 # 1693
	Gen. Election Day Expenses Mr. Cameron Lewis Raleigh County	P.O. Box 21 Daniels, W. Va.	500.00 - 500.00 # 1693
	Gen. Election Day Expenses Mr. Jack Murray Wood County	2305 23rd St. Parkersburg, W. Va.	500.00 - 500.00 # 1614
	Gen. Election Day Expenses Mr. S. L. Evans Logan County	P.O. Box 1495 Logan, W. Va.	500.00 - 500.00 # 1695
	Gen. Election Day Expenses Mr. Albert Falvo McDowell County	Roderfield, W. Va.	500.00 - 500.00 # 1696
	Gen. Election Day Expenses Mr. Johnny Oans Mingo County	England, W. Va.	500.00
10/17/78	Em. Valley Restaurant Service.	Charleston, W. Va.	40.00
10/20/78	J.C. Dillon, Jr. - expenses reimbursement for Sept. & Oct.	2106 Kanawha Blvd. Charleston, W. Va.	126.62

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DATE PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name) RESIDENCE AND MAILING ADDRESS AMOUNT

7/15/78	U.S. Postmaster, Postage	Charleston, W. Va.	\$ 500.00
8/11/78	Catering-J.J. Dinner Cle'ments (advance)	Charleston, W.Va.	5,000.00
8/16/78	Charleston Newspapers Advertising	Charleston, W.Va.	254.36
8/17/78	Civic Center-Auditorium deposit on building	Charleston, W.Va.	700.00
8/25/78	Boni Kudem Temple Rental on Building	Charleston, W. Va.	225.05
8/25/78	Cle'ments Catering-J.J. Dinner	Charleston, W. Va.	6,402.10
8/19/78	Lucky Jazz Band Music for Dinner	Huntington, W.Va.	480.00
8/25/78	Laury's - Catering J.J. Reception	14 1/2 Capitol St. Charleston, W. Va.	3,142.50
8/25/78	Pritt Graphic Arts decorating-J.J. Dinner	714 Jane St. Charleston, W. Va.	1,339.00
9/7/78	Dept. Finance & Administration State of W.Va. - Rental on airplane	State Capitol Charleston, W.Va.	630.00
9/7/78	Patterson, Bell & Crane Co. Insurance	1110 One Valley Square Charleston, W. Va.	25.00
9/7/78	Nick Wieppert Signs	1016 Grant Street Charleston, W.Va.	60.00
9/7/78	Lance's - decorations supplies	Quarrier St. Charleston, W. Va.	3.71
9/7/78	Barco Display supplies	2098 Oakridge Dr. Charleston, W.Va.	44.40
9/7/78	Modern Restaurant & Store Equipment Co. Candles	1305 Wash. St. E. Charleston, W. Va.	30.00
9/7/78	Franklin D. Roosevelt Library pictures	Hyde Park, N.Y.	3.25
9/7/78	Gen. Services Adm. pictures	819 Taylor St. Fort Worth, Tx.	9.30
9/7/78	Royal Oak - Printing	112 Main St. Oak Hill, W. Va.	589.71
9/7/78	Jarrett Printing Co.	501 Capitol St. Charleston, W. Va.	2,540.91
9/7/78	Gardner Photographies Pictures	1552 Quarrier St. Charleston, W.Va.	128.75
8/15/78	Piedmont Airlines Boardate's Advance man exp.	Airport Charleston, W. Va.	60.00
8/4/78	Three Printers duplicating	Charleston, W. Va.	29.02
8/16/78	Quick Copy duplicating	Charleston, W. Va.	7.01

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... PROVIDE THE DATE, AMOUNT, AND ...  
 ... OF EXPENDITURE ...  
 ... AND THE TOTAL AMOUNT OF SUCH EXPENDITURE MADE AND PAID DURING THE PERIOD COVERED BY THE REPORT.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
7/19/78	Quick Copy, duplicating	Charleston, W. Va.	\$ 12.31
9/20/78	reimbursement-advance cash expenses Mrs. Sharon Rockefeller	Charleston, W. Va.	222.31
9/20/78	Supplies S. Spencer Moore Co.	Capitol Street Charleston, W. Va.	51.06
9/20/78	Ladish Photography Pictures	826 Carroll Road Charleston, W. Va.	117.00
9/20/78	Peggy Workman reimbursement for supplies	Charleston, W. Va.	18.42
9/20/78	Allen Blueprint & Supply Co. Picture enlargements	811 Virginia St. E. Charleston, W. Va.	395.52
9/22/78	Democratic National Committee Aircraft expense-Vice President	1625 Massachusetts Ave. Washington, D. C.	1,469.38
9/22/78	Democratic National Committee Inflight services-Vice Pres.	Washington, D. C.	65.75
9/22/78	Avis Rent A Car V.Pres's advance man's use	Room 207, Old Executive Off. Building, Washington, D. C.	129.23
9/7/78	Marie Prezioso supplies	Charleston, W. Va.	43.75
9/7/78	Emilie Holroyd Bus express postate reimbursement	Princeton, W. Va.	4.50
10/3/78	Charleston Civic Center-balance Dinner Expenses	Charleston, W. Va.	2,229.61
10/11/78	Shanklin Greenhouse 2626 Conner Dr.	Charleston, W. Va.	80.00



3 1 2 1 2 1 2 1 1 2

Full Name of Candidate, Agent, <sup>(A)</sup> West Virginia State Democratic Executive Committee  
Treasurer or Committee Robert J. Burke, Treasurer  
(Print) (Signature) (Date)

Candidate for or Agent, Treasurer or Committee in support of the following candidate or cause \_\_\_\_\_  
\_\_\_\_\_

(Office sought, or candidate or cause supported)

State of West Virginia \_\_\_\_\_

Office 2106 Kanawha Blvd., E. Mailing Address Same  
 (Number) (Street) (Street Address or Box Number)

Charleston	25311	Same	
(Town or City)	(Zip)	(Town or City)	(Zip)

Residence \_\_\_\_\_  
Telephone \_\_\_\_\_ none \_\_\_\_\_

Business \_\_\_\_\_  
Telephone \_\_\_\_\_ 304-342-8122 \_\_\_\_\_

(3)

The balance of cash and any other sum of money on hand at the beginning of the period covered by this financial statement is \$ 39,483.84

The balance of cash and any other sum of money on hand at the end of the period covered by this financial statement is \$ 12,153.87

(C)

I hereby certify that the following is a true, complete, and itemized statement of all monies and other tangible things of value contributed or advanced by anyone, together with the full names of all such persons, firms, associations or committees who have made advances or contributions, provided that any contribution totaling more than fifty dollars (\$50.00) by any one contributor is by money order or by check.

## CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
11/1973	Eva Ruth Drorio	\$ 5.00			\$
11/1973	Emory Woodall	200.00			
11/1973	Wm. K. Hamilton	50.00			
11/1973	C. H. Amick	50.00			
11/1973	Albert Paolo	50.00			
11/1973	Point Dist. Co.	50.00			
11/1973	James H. Davis III	100.00			

\* For a limited period, reserved for other contributions of \$500 or less, must be submitted by the above-mentioned deadline.

10131	\$505.00
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Any additional pages needed for other contributions exceeding \$250 must include all of the above requested information.

I further certify that the following is a true, complete, and itemized statement of every FUND RAISING EVENT held during the period covered by this financial statement. A FUND RAISING EVENT means any event such as a dinner, reception, testimonial, cocktail party, auction or similar affair through which contributions are solicited or received by such means as purchase of a ticket, payment of an attendance fee or through purchase of goods and services.

Date of Event		Date of Event	
Type of Event		Type of Event	
Address of Place Held		Address of Place Held	
Name of Club or Club		Name of Place Held	
Total		Total	
Expenditures		Expenditures	
Net Receipts		Net Receipts	

• **Approved personnel** for Fund Raising events must include all of the following information:

... ..

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Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL	8 None
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## FUND RAISING EVENT

CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EXCEED \$250  
(Residence, Mailing Address, Business and Occupation must be listed)

(Residence, Mailing Address, Business and Occupation must be listed)

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 2NAME OF CONTRIBUTOR  
(Print, Mr. J., Ltd.)

RESIDENCE AND MAILING ADDRESS

## BUSINESS AND OCCUPATION

A.C. 57

[illegible]

Any additional pages needed for Fund Raising Events must include all of the above requested information.

	None
TOTAL	5

Table 1. *Continued*

(17)

It is necessary that all contributions received during the period covered by the financial statements are

in Section C above, in Section D or both, and that the total amount of all such contributions

231

I, \_\_\_\_\_, of \_\_\_\_\_, West Virginia, do hereby certify that the foregoing is a true and correct statement of the expenditures made by me or by any person or organization for the purpose of influencing the outcome of the election of \_\_\_\_\_, held on \_\_\_\_\_, 19\_\_\_\_, and that the same were made during the period beginning on the \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_, and ending on the \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (Last name, first name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
10/24/78	Calhoun Co. Committee Gen. Election Day Expenses Mr. David Cain	Big Bend, W. Va.	\$ 300.00
	Gilmer Co. Committee Gen. Election Day Expenses Mr. Art L. Smith	Sand Fork, W. Va.	300.00
	Hardy Co. Committee Gen. Election Day Expenses Mr. Guy Lantz	P.O. Box 1 Moorefield, W. Va.	300.00
	Monroe Co. Committee Gen. Election Day Expenses Mr. Fred Parker	Rt. 1, Box 40 Greenville, W. Va.	300.00
	Morgan Co. Committee Gen. Election Day Expenses Mr. Charles Miller	RD #1 Boykeley Springs, W. Va.	300.00
	Pendleton Co. Committee Gen. Election Day Expenses Mr. Paul Norton	P.O. Box 455 Franklin, West Virginia	300.00
	Pleasants Co. Committee Gen. Election Day Expenses Mr. Bernard Fica	Rt. 2 St. Marys, West Virginia	300.00
	Pocahontas Co. Committee Gen. Election Day Expenses Mr. Guy Baltz	1510 Huntersville Rd. Marlinton, W. Va.	300.00
Sub-total			2,400.00
TOTAL			\$ 27,329.97

Any additional pages needed for other expenditures must include all of the above requested information.

(G)

I further certify that this statement lists all financial transactions, as reported above in Sections C, D, and F, of the period beginning on the 31st day of October, 1978, and ending on the 30th day of November, 1978.

(H)

I further certify that the total expenditure for the nomination, election or defeat of my candidacy (or any other person or organization advocating or opposing the nomination, election or defeat of any candidate) or for the nomination, election or defeat of any issue, thing or item to be voted upon, in whose behalf an expenditure was made, was given for the Election is \$ 88,551.44. This total includes all expenditures made as of the date of this statement, including all expenditures previously reported in other statements.)

OATH OF AFFIRMATION

I, \_\_\_\_\_, of \_\_\_\_\_, West Virginia, do hereby certify that the foregoing is a true and correct statement of the expenditures made by me or by any person or organization for the purpose of influencing the outcome of the election of \_\_\_\_\_, held on \_\_\_\_\_, 19\_\_\_\_, and that the same were made during the period beginning on the \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_, and ending on the \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_.

Robert J. Burke  
being duly sworn, deposes and says that the foregoing is a true and correct statement, to the best of his knowledge and belief, of all financial transactions made by him or by any person or organization for the purpose of influencing the outcome of the election of \_\_\_\_\_, held on \_\_\_\_\_, 19\_\_\_\_, and that the same were made during the period beginning on the \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_, and ending on the \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_.

\_\_\_\_\_  
Signature of Candidate, Agent, or Treasurer

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_.

\_\_\_\_\_  
Notary Public

17th day of January, 1985



REPORT OF THE COMMISSIONERS OF THE LAND OFFICE, WEST VIRGINIA, FOR THE YEAR 1904. THE COMMISSIONERS HAVE THE HONOR TO ACKNOWLEDGE THE RECEIPT OF THE FOLLOWING REPORTS FROM THE SEVERAL COUNTIES, AND TO STATE THAT THE SAME HAVE BEEN EXAMINED AND FOUND CORRECT.

REPORT OF THE COMMISSIONERS OF THE LAND OFFICE, WEST VIRGINIA, FOR THE YEAR 1904.

RESIDENCE AND ADDRESS OF THE COMMISSIONERS.

Amount.

Ritchie Co. Committee

10/30/73	Gen. Election Day Expenses	Smithville, W. Va.	300.00
	Mr. Eldon Haught		
	Roane Co. Committee		
	Gen. Election Day Expenses	211 2nd St.	
	Mr. Rex Starcher	Spencer, W. Va.	300.00
	Tucker Co. Committee		
	Gen. Election Day Expenses	202 Fourth St.	
	Mr. Forrest Ammentrout	Parsons, W. Va.	300.00
	Wirt Co. Committee		
	Gen. Election Day Expenses	P.O. Box 153	
	Mrs. Faustine Bauman	Elizabeth, W. Va.	300.00
	Berkeley Co. Committee		
	Gen. Election Day Expenses		
	Mr. Goode Cess	Bunker Hill, W. Va.	300.00
	Brooke Co. Committee		
	Gen. Election Day Expenses	R 528 Banfield Ave.	
	Ms. Mary Ciccolella	Follansbee, W. Va.	300.00
	Hampshire Co. Committee		
	Gen. Election Day Expenses	P.O. Box 5	
	Mr. Vernon Whitacre	High View, West Va.	300.00
	Mineral Co. Committee		
	Gen. Election Day Expense	80 Maple Ave.	
	Mr. Kenneth V. Ward	Keyser, W. Va.	300.00
	Preston Co. Committee		
	Gen. Election Day Expenses	Spring Street	
	Mr. Robert Cline	Rowlesburg, W. Va.	300.00
	Jackson Co. Committee		
	Gen. Election Day Expenses	500 Church St.	
	Mr. Joseph R. Goodwin	Ripley, W. a.	500.00
	Lewis Co. Committee		
	Gen. Election Day Expenses	Rt. 4, Box 36-10	
	Mr. Tom Alfred	Weston, W. Va.	500.00
	Randolph Co. Committee		
	Gen. Election Day Expenses	Robert Lee Avenue	
	Mr. Wimpy Valentine	Elkins, W. Va.	500.00
	Summers Co. Committee		
	Gen. Election Day Expenses	P.O. Box 106	
	Mr. Gary Deeds	Jumping Branch, W. Va.	500.00
	Taylor Co. Committee		
	Gen. Election Day Expenses	Rt. 3, Box 410	
	Mr. C. R. Kinsey	Grafton, W. Va.	500.00
	Cabell Co. Committee		
	Gen. Election Day Expenses	P.O. Box 1965	
	Mr. Robert Nelson	Huntington, W. Va.	500.00
	Fayette Co. Committee		
	Gen. Election Day Expenses	P.O. Box 218	
	Mr. Ray A. Goforth	Charlton Heights, W. Va.	500.00
	Harrison Co. Committee		
	Gen. Election Day Expenses	230 Maple Ave.	
	Mr. Jim Shaffer	Clarksburg, West Virginia	500.00
	Marion Co. Committee		
	Gen. Election Day Expenses	313 Professional Bldg.	
	Mr. Dominick Marino	Fairmont, W. Va.	500.00
	Marion Co. Committee		
	Gen. Election Day Expenses	800 Princeton Ave.	
	Mr. Paige Woodbridge	Bluefield, W. Va.	500.00
	Monongalia Co. Committee		
	Gen. Election Day Expenses	Assessor's Office	
	Mr. John Roff	Morgantown, West Virginia	500.00
	Raleigh Co. Committee		
	Gen. Election Day Expenses	P.O. Box 21	
	Mr. C. W. Lewis	Daniels, W. Va.	500.00
	Rockwell Co. Committee		
	Gen. Election Day Expenses	2305 23rd St.	
	Mr. Jack Manning	Parkersburg, W. Va.	500.00

OFFICE OF THE COMMISSIONER  
AND TO THE  
(First Name, Last Name)

RESIDENCE AND MAILING ADDRESS

AMOUNT

DATE	NAME	RESIDENCE AND MAILING ADDRESS	AMOUNT
9/30/78	Logan Co. Committee Gen. Election Day Expenses Mr. S. L. Evans	P.O. Box 1495 Logan, West Virginia	500.00
	McDowell Co. Committee Gen. Election Day Expenses Mr. Albert Falvo	Roderfield, W. Va.	500.00
	Mingo Co. Committee Gen. Election Day Expenses Mr. Johnny Owens	Ragland, West Virginia	500.00
	Ohio Co. Committee Gen. Election Day Expenses Mr. Melvin Kahle, Jr.	28 Maple Ave. Wheeling, W. Va.	500.00
	Doone Co. Committee Gen. Election Day Expenses Mr. John Protan	P.O. Box 82 Sylvester, W. Va.	700.00
	Braxton Co. Committee Gen. Election Day Expenses Mr. Eugene Facemire	290 N. Braxton St. Sutton, W. Va.	700.00
	Greenbrier Co. Committee Gen. Election Day Expenses Mr. Chris Walkup	White Sulphur Springs, W. Va.	700.00
	Hancock Co. Committee Gen. Election Day Expenses Mr. Eli Dragesich	100 Powers Road Weirton, W. Va.	700.00
	Lincoln Co. Committee Gen. Election Day Expenses Mr. Wylie Stowers	Rt. 2 Hamlin, W. Va.	700.00
	Marshall Co. Committee Gen. Election Day Expenses Mr. James L. Tennant	P.O. Box 617 Moundsville, W. Va.	700.00
	Mason Co. Committee Gen. Election Day Expenses Mr. Forrest Clark	2212 Jackson Ave. Point Pleasant, W. Va.	700.00
	Nicholas Co. Committee Gen. Election Day Expenses Mr. Shirley Cutlip	Craigsville, W. Va.	700.00
	Putnam Co. Committee Gen. Election Day Expenses Mr. Bill Snyder	222 Beechwood Estates Scott Depot, W. Va.	700.00
	Wayne Co. Committee Gen. Election Day Expenses Mr. Lucian Fry	P.O. Box 2007 Wayne, W. Va.	700.00
	Webster Co. Committee Gen. Election Day Expenses Mr. Eugene Goff	P.O. Box 278 Cowen, West Virginia	700.00
	Wyoming Co. Committee Gen. Election Day Expenses Mr. Bill Bailey	Pineville, W. Va.	700.00
	Wetzel Co. Committee Gen. Election Day Expenses Mr. Gene Wayne	P.O. Box 12 Hastings, W. Va.	200.00
	Tyler Co. Committee Gen. Election Day Expenses Mr. Pat Niklas	Rt. 3 Sistersville, W. Va.	200.00
	Grant Co. Committee Gen. Election Day Expenses Mr. Richard Hargold	Petersburg, W. Va.	200.00
	Dunklin Co. Committee Gen. Election Day Expenses Mr. W. E. Williams, Sr.	202 Louise Ave. West Union, W. Va.	200.00
	Additional Contribution Mr. E. Rayan	#4 Hilltop St. Philippi, W. Va.	600.00
	Summers Co. Committee Gen. Election Day Expenses Mr. Gary Deeks	P.O. Box 106 Jumping Branch, W. Va.	200.00



RECORD OF EXPENDITURES  
AND TO WHOM  
(First Name, M. I., Last Name)

RESIDENCE AND MAILING ADDRESS

AMOUNT

11/ 1/78	Office Rent Currae Park East	Charleston, W. Va. 2106 Kanawha Blvd., E.	375.00
11/2/78	Payroll, Jewell Bailey	Charleston, W.Va.	460.91
11/3/78	Political Contribution Roger W. Tompkins	P.O. Box 1336 Charleston, W.Va.	500.00
11/3/78	Political Contribution Lyle Sattes	12 Capitol St. Charleston, W. Va.	500.00
11/5/78	C & P Telephone Co.	Charleston, W. Va.	203.00
11/5/78	Gulf Oil Corp.	Atlanta, Ga.	91.30
11/1/78	Blue Cross Hospital Ser.	Charleston, W.Va.	60.42
11/13/78	Nat. Party Conference-Rooms Dem. Conf. Housing Acct.	Memphis, Tenn.	150.00
11/14/78	Nat. Party Conference-Rooms Dem. Conf. Housing Acct.	Memphis, Tenn.	50.00
11/15/78	Payroll, Jewell Bailey	Charleston, W.Va. -	460.91
11/17/78	C & P Telephone Co. Reg.Ser.	Charleston, W.Va.	217.84
11/17/78	C & P Telephone Co. Measured Service	Charleston, W.Va.	242.63
11/17/78	Xerox Corporation Service	Cincinnati, Ohio	352.05
11/30/78	Payroll-Jewell Bailey	Charleston, W.Va.	460.91
11/1/78	Retirement-Jewell Bailey	Charleston, W.Va.	100.00
Total			<u>\$27,829.97</u>

## ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,  
Other Income, Loans, Refunds)Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3Page 12 of 13 forLine Number 15(a)(Use Separate Schedules for  
each numbered line)

of Candidate or Committee in Full

Kanawha County Democratic Executive Committee

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
West Virginia Democratic Executive Committee Terrace Park East Charleston, West Virginia 25311	Same Occupation Political Committee	10/23/78	\$1,100.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 1,100.00		
West Virginia Democratic Executive Committee Terrace Park East Charleston, West Virginia 25311	Same Occupation Political Committee	11/4/78	\$1,000.00.
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 2,100.00		
Slack for Congress Committee Charleston National Plaza Charleston, West Virginia 25301	Same Occupation Political Committee	10/31/78	\$2,000.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 2,000.00		
Randolph for Senate 807 Virginia Street Charleston, West Virginia 25301	Same Occupation Political Committee	11/3/78	\$4,700.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 4,700.00		
Kanawha County Democratic Women's Club 2442 Kanawha Blvd., East Charleston, West Virginia 25311	Same Occupation Political Committee	11/4/78	\$1,000.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 1,000.00		
Citizens for Boettner Charleston National Plaza Charleston, West Virginia 25301	Same Occupation Political Committee	11/4/78	\$1,925.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 1,925.00		
AFL-CIO COPE Kanawha Blvd., East Charleston, West Virginia 25311	Same Occupation Political Committee	10/19/78	\$ 100.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 100.00		

SUBTOTAL of receipts this page (optional) \$ 11,825.00

TOTAL this period (last page this line number only) \$ 49,441.45



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Robert J. Burke, Treasurer  
West Virginia State Democratic  
Executive Committee  
2106 Kanawha Blvd., E  
Charleston, West Virginia 25311

Dear Mr. Burke:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. It has come to our attention that your organization may have made expenditures to influence Federal elections during calendar years 1976 and 1978. In particular, your committee appears to have made transfers totaling \$3,500 in 1976, and \$40,900 in 1978, for election day expenses.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" for calendar years 1976 and 1978. As such, your organization may be subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant information materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

-2-

Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have any questions, please contact David Greevy, in our Reports Analysis Division at (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Thomas J. Haselhorst  
Assistant Staff Director

Enclosure

FYI :

The attached four SV's were referred, without backup, from Audit. The information in the Audit referrals has been incorporated into the SV notices.

---

Can audit provide any backup to attach to these letters?

It seems to me that the U.V. letters in particular should have more explanation as to the basis for the allegations.

ABP  
9/11

Memo to the File:

Allocation/West Virginia Committees

11/7/79/Greevy

Meeting with Ken Gross

and: Bobby Werfel

Fran Hagan

Rick Halter

Dug Greevy

The above met this day to discuss the proposal which Audit and RAD jointly prepared and submitted to OGC regarding Allocation of Expenses by Party Committees/7/13/79.

Gross stated that Claire Lindsay had written a proposal in response to the Audit/RAD proposal prior to her departure. We discussed the need to have some specific guidelines for committees to follow if in fact we determine that action should be pursued against them.

However, we noted that the Commission thus far has not provided any certain guidance, particularly in the case of GOTV/ voter registration expenses made by committees which do not have segregated accounts.

Gross acknowledged our dilemma. In particular, we stated that there are several referrals received from Audit by RAD regarding WV committees which expended in excess of \$1,000 for GOTV. Based upon various formulas, the committees may or may not have to register with FEC. We stated that we did not think it right to send letters to the committees unless we could be more specific as to why they qualify as political committees.

Gross stated that he would forward to us a copy of the Lindsay proposal, and that he would review the amounts in question for the WV committees.

We are to respond to the Lindsay proposal as soon as possible so that a final decision can be made on this matter.



REPORTS ANALYSIS REFERRAL SHEET

DATE March 28, 1980 ANALYST Dug Greevy 11/3/11  
 TO: Office of General Counsel TEAM CHIEF Bobby Werfel 11/3/11  
 THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW as/  
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS JH

CANDIDATE/COMMITTEE: 1976 Logan County Democratic Campaign Committee  
 TREASURER: Mr. Thomas A. Tomblin  
 ADDRESS: Justice Addition  
 Logan, West Virginia 25601  
 AFFILIATE(S):

ALLEGATION(S): CITE: ATTACHMENT(S)  
 Unregistered Political Committee 2 U.S.C. 433 & 434 A

DATE INITIATED: 2/12/79

MANNER IN WHICH REVIEW WAS INITIATED: Referral from Audit Division  
☐ Normal Review ☐ Other: ATTACHMENT A  
☐ Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM \_\_\_\_\_ TO \_\_\_\_\_

TOTAL RECEIPTS \$ \_\_\_\_\_ TOTAL EXPENDITURES \$ \_\_\_\_\_

CASH ON HAND \$ \_\_\_\_\_ DEBTS \$ \_\_\_\_\_

HISTORY:

RESULTS OF REVIEW: ATTACHMENT

None

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT

None

REASON(S) FOR REFERRAL: ATTACHMENT

See Cover Memo: Haselhorst to OGC

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT

None

OTHER RELEVANT INFORMATION: ATTACHMENT

Letter Prepared to Send to Committee  
 Orlando Potter's comment on Prepared Letter, 9/11/79  
 Memo to the File: Greevy, 11/7/79

B  
C  
D

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

None



## FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

February 12, 1979

MEMORANDUM

TO: TOM HASELHORST

FROM: *RPC* BOB COSTA/JOE STOLTZ *JS*

SUBJECT: UNREGISTERED POLITICAL ORGANIZATION

During a recent audit of the West Virginia State Democratic Telethon Committee, the Audit staff was presented with a copy of a State disclosure report of the 1976 Logan County Democratic Campaign Committee ("the County Committee") (Attachment #1), an unregistered political organization.

Based upon a review of the report as outlined below, it is the opinion of the Audit staff that the County Committee has engaged in activity which would require it to register and report in accordance with Sections 433 and 434 of Title 2 of the United States Code.

Registration and Reporting by a Political Committee

Section 433(a) of Title 2 of the United States Code requires each political committee which anticipates receiving contributions or making expenditures during the calendar year in an aggregate amount or value exceeding \$1,000 to file with the Commission a statement of organization within 10 days following the date of the anticipation.

Section 434(a) of Title 2 of the United States Code requires the treasurer of a political committee to file with the Commission reports of receipts and expenditures on prescribed or approved forms.

Our review of the State report revealed a fundraising event held October 28, 1976 which netted proceeds of \$19,350.00. The proceeds of the event were disbursed by the County Committee to district coordinators for distribution to precinct captains for the purposes set forth in Chapter 3, Article 8, Section 9 of the Code of West Virginia. According to a representative of the West Virginia Attorney General's office, the section of the code



cited above deals with expenditures of a political committee, a portion of which deals specifically with election day expenses.

It is the opinion of the Audit staff, based upon the information presented, that the distribution mentioned above was made for Get-Out-The Vote activities. As such, according to Advisory Opinion 1978-10, the County Committee would normally be required to allocate the activity between Federal and non-Federal elections on a reasonable basis. It appears reasonable that the portion allocated for Federal elections would exceed \$1,000. As such, the County Committee would normally be required to register and report in accordance with Sections 433 and 434. Therefore, the matter is referred to your Division for consideration along with the matter referred on November 30, 1978 (Attachment #2).

Any questions concerning the matter should be communicated to Ray Lisi on extension 3-4060 or Charlie Hanshaw on extension 3-4155.

Attachments as stated



## Statement of Receipts and Expenditures for Candidates, Agents, Treasurers or Committees

This statement is required to be filed according to the provisions of West Virginia Code §3-8-5 within 30 days after the date of the Election with the Secretary of State, Charleston, West Virginia, for all offices to be filled or issues to be voted upon by the voters of a political division greater than a county. For all offices to be filled or issues to be voted upon by the voters of a county or district therein, file this statement with the County Clerk. For all offices to be filled or issues to be voted upon by the voters of a city, file this statement with the City Clerk or Recorder. This statement has been prepared by James R. McCartney, Secretary of State of West Virginia, pursuant to the provisions of West Virginia Code §3-8-6.

(A)

Full Name of Candidate, Agent, Treasurer or Committee Thomas A. Tomblin  
(First) (Middle Initial) (Last)

Candidate for; or Agent, Treasurer or Committee in support of the following candidate or cause 1976 Logan County Democratic Campaign Committee  
(Office sought, or candidate or cause supported)  
Logan County  
(District or Circuit if any)

Party Affiliation (if any) Democratic

Residence Justice Addition Mailing Address Box 813  
(Number) (Street) (Street Address or Box Number)

Logan, West Virginia 25601 Logan, West Virginia 25601  
(Town or City) (Zip) (Town or City) (Zip)

Residence Telephone 752-2219 Business Telephone 752-3100

(B)

The balance of cash and any other sum of money on hand at the beginning of the period covered by this financial statement is \$ 10,761.25  
The balance of cash and any other sum of money on hand at the end of the period covered by this financial statement is \$ 342.81

(C)

I hereby certify that the following is a true, complete, and itemized statement of all monies and other tangible things of value contributed or advanced by anyone, together with the full names of all such persons, firms, associations or committees who have made advances or contributions, provided that any contribution totaling more than fifty dollars (\$50.00) by any one contributor is by money order or by check.

## CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
11-1-76	Mike Hill	\$ 50.00			\$
11-1-76	Claude Ellis	50.00			
11-1-76	Swanzy Evans	50.00			
11-1-76	Paul White	50.00			
11-1-76	David White	50.00			

Any additional pages needed for other contributions of \$250 or less must include all of the above requested information.

TOTAL \$ 250.00

(Residence, Mailing Address, Business and Occupation must be listed)

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
	Mrs. Amos Doss	Box 77 Wilkinson, W. Va.	Grocery	\$1,000.00
	Joe Dingess	Box 987 Chapmanville, W.Va.	Contractor	1,500.00
	Donald D. Lambert	Kistler, West Va.	Foreman	300.00
	Logan County Democratic Executive Committee	Logan, W.Va.		500.00
TOTAL				\$3,300.00

Any additional pages needed for other contributions exceeding \$250 must include all of the above requested information.

(D)

I further certify that the following is a true, complete, and itemized statement of every FUND RAISING EVENT held during the period covered by this financial statement. A FUND RAISING EVENT means any event such as a dinner, reception, testimonial, cocktail party, auction or similar affair through which contributions are solicited or received by such means as purchase of a ticket, payment of an attendance fee or through purchase of goods and services.

#### FUND RAISING EVENTS

Date of Event	October 28, 1976	Date of Event	
Type of Event	Hoot Owl Buffett	Type of Event	
Address of Place Held	Henlawson, West Va.	Address of Place Held	
Name of Place Held	Chief Logan State Park Restaurant	Name of Place Held	
Total Expenditures	\$ 2,169.94	Total Expenditures	\$
Net Receipts	\$ 19,350.00	Net Receipts	\$

Date of Event		Date of Event	
Type of Event		Type of Event	
Address of Place Held		Address of Place Held	
Name of Place Held		Name of Place Held	
Total Expenditures	\$	Total Expenditures	\$
Net Receipts	\$	Net Receipts	\$

Any additional pages needed for Fund Raising Events must include all of the above requested information.

# FUND RAISING EVENT

## CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
10-29-76	D. R. Winters	\$100.00			\$
10-29-76	Denver Mathis	100.00			
10-29-76	Leonard Ware	100.00			
10-29-76	Sammy Dalton	100.00			
10-29-76	Patricia Richmond	100.00			
10-29-76	Doris J. Hall	100.00			
10-29-76	Deanna Lynn Bryant	200.00			
10-29-76	Howard Dalton	200.00			
10-29-76	Phillip R. Cadd	100.00			
10-29-76	Opal Williamson	100.00			
10-29-76	Opal Combs	100.00			

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL \$ 1,300.00

# FUND RAISING EVENT

## CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EXCEED \$250 (Residence, Mailing Address, Business and Occupation must be listed)

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
10-29-76	James A. Trent	Box 145 Wilkinson, W.Va.	Machinist	\$ 1,000.00
10-29-76	George Albright, Jr.	Box 776 Logan, West Va.	Manager	400.00
10-29-76	Woodrow Lowe	613 Stratton Street Logan, West Va.	Circuit Clerk	700.00
10-29-76	J. Thomas Godby	427 Circle Drive Logan, West Va.	Assessor	400.00
10-29-76	Ervin S. Queen	West Logan, W.Va.	Self-employed	1,000.00
10-29-76	Enos Ramey	Box 37 Switzer, W.Va.	Grocery	500.00
10-29-76	Ralph Grimmett	Kistler, W.Va.	Self-employed	800.00
10-29-76	James N. Grubb	313 West Avis Avenue Man, W.Va.	Attorney	700.00
10-29-76	Andy Sos	Box 11 McConnell, W.Va.	service station operator	600.00

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL \$ 6,100.00

(E)

I further certify that all contributions received during the period covered by this financial statement have been reported above in Section C or Section D or both, and that the total amount of all such contributions is \$ 22,900.00



I further certify that the following is a true, complete, and itemized statement showing the date, amount and purpose of each expenditure made or liability incurred, together with the full name, residence and mailing address of each person, firm, association, or committee to whom each expenditure was made or liability incurred, and the total amount of such expenditures made and liabilities incurred during the period covered by this statement.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
10-15-76	Logan Banner	Logan, West Virginia	1,170.00
10-28-76	Logan News Printers	Logan, West Virginia	\$ 18.75
10-29-76	Park Restaurant	Logan, West Virginia	1,733.75
11-1-76	Logan Bank & Trust	Logan, W. Va. - 18,827.00	250.00 cash
	*TO DISTRICT COORDINATORS to distribute to precinct captains for the purposes set forth in Chapter 3, Article 8, Section 9, of the Code of West Virginia.		19,077.00 *
	<u>DISTRIBUTED TO</u>	<u>AMOUNT</u>	
	Ralph Grimmett	3,750.00	
	Ralph Grimmett	1,100.00	
	Claude Ellis & Swansey Evans	5,100.00	
	Michall H. Hill & Vernon Dingess	4,150.00	
	Harold Hale	3,600.00	
	Claude Ellis	1,377.00	
		<u>\$19,077.00</u>	
11-8-76	Logan Coca-Cola Bot. Co.	Logan, West Va.	24.00
11-8-76	Logan News Printers	Logan, West Va.	300.00
11-29-76	Logan News Printers	Logan, West Va.	97.50
11-29-76	Jean Queen	West Logan, West Va.	136.19
Any additional pages needed for other expenditures must include all of the above requested information.			TOTAL \$ 22,557.19

(G)

I further certify that this statement lists all financial transactions, as reported above in Sections C, D, and F, for the period beginning on the 28th day of October, 19 76, and ending on the 1st day of December, 19 76.

(H)

I further certify that the total expenditure for the nomination, election or defeat of my candidacy (or any person or organization advocating or opposing the nomination, election or defeat of any candidate), or the passage or defeat of any issue, thing or item to be voted upon, in whose behalf an expenditure was made

or a contribution was given for the Election is \$ 22,557.19

This total includes all expenditures made as of the date of this statement, including all expenditures previously reported in other statements.)

### OATH OR AFFIRMATION

State of West Virginia

County of Logan, ss.

Thomas A. Tomblin, being duly sworn, deposes and says that the foregoing is a true and correct statement, to the best of his knowledge and belief, of all financial transactions occurring within the period covered by this statement.

Signature of Candidate, Agent, or Treasurer

Subscribed and sworn to before me this 2nd day of December, 19 76

Notary Public

My Commission expires on the 5th day of April, 19 78

Statement of Receipts and Expenditures for Candidates, Agents, Treasurers or Committees

This statement is required to be filed according to the provisions of West Virginia Code §3-8-5 within 30 days after the date of the Election with the Secretary of State, Charleston, West Virginia, for all offices to be filled or issues to be voted upon by the voters of a political division greater than a county. For all offices to be filled or issues to be voted upon by the voters of a county or district therein, file this statement with the County Clerk. For all offices to be filled or issues to be voted upon by the voters of a city, file this statement with the City Clerk or Recorder. This statement has been prepared by James R. McCartney, Secretary of State of West Virginia, pursuant to the provisions of West Virginia Code §3-8-6.

(A)

Full Name of Candidate, Agent, Treasurer or Committee

Thomas

(First)

A.

(Middle Initial)

Tomblin

(Last)

Candidate for; or Agent, Treasurer or Committee in support of the following candidate or cause

1976 Logan County Democratic Campaign Committee

(Office sought; or candidate or cause supported)

Logan County

(District or Circuit if any)

Party Affiliation (if any)

Democratic

Residence

Justice Addition

(Number)

(Street)

Logan, West Virginia

(Town or City)

25601

(Zip)

Residence Telephone

752-2219

Mailing Address

Box 813

(Street Address or Box Number)

Logan, West Virginia

(Town or City)

25601

(Zip)

Business Telephone

752-3100

(B)

The balance of cash and any other sum of money on hand at the beginning of the period covered by this financial statement is \$ 10,761.25

The balance of cash and any other sum of money on hand at the end of the period covered by this financial statement is \$ 342.81

(C)

I hereby certify that the following is a true, complete, and itemized statement of all monies and other tangible things of value contributed or advanced by anyone, together with the full names of all such persons, firms, associations or committees who have made advances or contributions, provided that any contribution totaling more than fifty dollars (\$50.00) by any one contributor is by money order or by check.

CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
11-1-76	Mike Hill	\$ 50.00			\$
11-1-76	Claude Ellis	50.00			
11-1-76	Swanzy Evans	50.00			
11-1-76	Paul White	50.00			
11-1-76	David White	50.00			

(Residence, Mailing Address, Business and Occupation must be listed)

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
	Mrs. Ames Doss	Box 77 Wilkinson, W. Va.	Grocery	\$1,000.00
	Joe Dingess	Box 987 Chapmanville, W.Va.	Contractor	1,500.00
	Donald D. Lambert	Kistler, West Va.	Foreman	300.00
	Logan County Democratic Executive Committee	Logan, W.Va.		500.00
TOTAL				\$3,300.00

Any additional pages needed for other contributions exceeding \$250 must include all of the above requested information.

(D)

I further certify that the following is a true, complete, and itemized statement of every FUND RAISING EVENT held during the period covered by this financial statement. A FUND RAISING EVENT means any event such as a dinner, reception, testimonial, cocktail party, auction or similar affair through which contributions are solicited or received by such means as purchase of a ticket, payment of an attendance fee or through purchase of goods and services.

#### FUND RAISING EVENTS

Date of Event	October 28, 1976	Date of Event	
Type of Event	Hoot Owl Buffett	Type of Event	
Address of Place Held	Henlawson, West Va.	Address of Place Held	
Name of Place Held	Chief Logan State Park Restaurant	Name of Place Held	
Total Expenditures	\$ 2,169.94	Total Expenditures	\$
Net Receipts	\$ 19,350.00	Net Receipts	\$

Date of Event		Date of Event	
Type of Event		Type of Event	
Address of Place Held		Address of Place Held	
Name of Place Held		Name of Place Held	
Total Expenditures	\$	Total Expenditures	\$
Net Receipts	\$	Net Receipts	\$

Any additional pages needed for Fund Raising Events must include all of the above requested information.

# CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
10-29-76	D. R. Winters	\$100.00			\$
10-29-76	Denver Mathis	100.00			
10-29-76	Leonard Ware	100.00			
10-29-76	Sammy Dalton	100.00			
10-29-76	Patricia Richmond	100.00			
10-29-76	Doris J. Hall	100.00			
10-29-76	Deanna Lynn Bryant	200.00			
10-29-76	Howard Dalton	200.00			
10-29-76	Phillip R. Cadd	100.00			
10-29-76	Opal Williamson	100.00			
10-29-76	Opal Combs	100.00			

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL \$ 1,300.00

## FUND RAISING EVENT

### CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EXCEED \$250 (Residence, Mailing Address, Business and Occupation must be listed)

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
10-29-76	James A. Trent	Box 145 Wilkinson, W.Va.	Machinist	\$ 1,000.00
10-29-76	George Albright, Jr.	Box 776 Logan, West Va.	Manager	400.00
10-29-76	Woodrow Lowe	613 Stratton Street Logan, West Va.	Circuit Clerk	700.00
10-29-76	J. Thomas Godby	427 Circle Drive Logan, West Va.	Assessor	400.00
10-29-76	Ervin S. Queen	West Logan, W.Va.	Self-employed	1,000.00
10-29-76	Enos Ramey	Box 37 Switzer, W.Va.	Grocery	500.00
10-29-76	Ralph Grimmett	Kistler, W.Va.	Self-employed	800.00
10-29-76	James N. Grubb	313 West Avis Avenue Man, W.Va.	Attorney	700.00
10-29-76	Andy Sos	Box 11 McConnell, W.Va.	service station operator	600.00

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL \$ 6,100.00

(E)

I further certify that all contributions received during the period covered by this financial statement have been reported above in Section C or Section D or both, and that the total amount of all such contributions

is \$ 22,900.00

I hereby certify that the following is a true, complete, and itemized statement showing the date, amount and purpose of each expenditure made or liability incurred, together with the full name, residence and mailing address of each person, firm, association, or committee to whom each expenditure was made or liability incurred, and the total amount of such expenditures made and liabilities incurred during the period covered by this statement.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
10-15-76	Logan Banner	Logan, West Virginia	1,170.00
10-28-76	Logan News Printers	Logan, West Virginia	18.75
10-29-76	Park Restaurant	Logan, West Virginia	1,733.75
11-1-76	Logan Bank & Trust	Logan, W. Va. - 18,827.00 250.00 cash	19,077.00 *
	*TO DISTRICT COORDINATORS to distribute to precinct captains for the purposes set forth in Chapter 3, Article 8, Section 9, of the Code of West Virginia.		
	<u>DISTRIBUTED TO</u>	<u>AMOUNT</u>	
	Ralph Grinnett	3,750.00	
	Ralph Grinnett	1,100.00	
	Claude Ellis & Swansey Evans	5,100.00	
	Michall H. Hill & Vernon Dingess	4,150.00	
	Harold Hale	3,600.00	
	Claude Ellis	1,377.00	
		<u>\$19,077.00</u>	
11-8-76	Logan Coca-Cola Bot. Co.	Logan, West Va.	24.00
11-8-76	Logan News Printers	Logan, West Va.	300.00
11-29-76	Logan News Printers	Logan, West Va.	97.50
11-29-76	Jean Queen	West Logan, West Va.	136.19
Any additional pages needed for other expenditures must include all of the above requested information.			
TOTAL			\$ 22,557.19

(G)

I further certify that this statement lists all financial transactions, as reported above in Sections C, D, and F, for the period beginning on the 28th day of October, 19 76, and ending on the 1st day of December, 19 76.

(H)

I further certify that the total expenditure for the nomination, election or defeat of my candidacy (or any person or organization advocating or opposing the nomination, election or defeat of any candidate), or the passage or defeat of any issue, thing or item to be voted upon, in whose behalf an expenditure was made

or a contribution was given for the Election is \$ 22,557.19

(This total includes all expenditures made as of the date of this statement, including all expenditures previously reported in other statements.)

### OATH OR AFFIRMATION

State of West Virginia

County of Logan, ss.

Thomas A. Tomblin, being duly sworn, deposes and says that the foregoing is a true and correct statement, to the best of his knowledge and belief, of all financial transactions occurring within the period covered by this statement.

Signature of Candidate, Agent, or Treasurer

Subscribed and sworn to before me this 2nd day of December, 19 76

Notary Public

My Commission expires on the 5th day of April, 19 78.



November 30, 1978

MEMO TO THE FILE

During the course of the audit of the West Virginia State Democratic Telethon Committee, the auditors performed a cursory review of disclosure reports filed by candidates for Federal office from the State of West Virginia to determine whether all transfers had been disclosed in accordance with 2 U.S.C. 434(b)(4).

As a result of the trace, it was determined that the Keep Nick Rahall In Congress Committee made the following transfers to unregistered political groups within West Virginia for apparent Get Out The Vote Activities:

Committee For a Better Logan County	5-02-78	\$5,000.00
Independent Democrats Committee (Logan County)	5-02-78	3,000.00
Independent Democrats Committee (Logan County)	5-05-78	2,000.00
Mingo County Democratic Executive Committee	5-03-78	2,500.00
Mingo County Democratic Executive Committee	5-05-78	1,500.00

Since this activity totally involves committees not within the scope of the West Virginia State Democratic Telethon Committee audit, the activity was mentioned to the Reports Analysts responsible for reviewing reports of West Virginia Committees to make them aware of the situation in order that they may deem it necessary to pursue the recipient committees as unregistered committees.

cc: Tom Haselhorst,  
Assistant Staff Director  
for Reports Analysis



REQUEST FOR ADDITIONAL INFORMATION - PAGE TWO  
KEEP NICK RAHALL IN CONGRESS COMMITTEE  
30 DAY POST PRIMARY REPORT

On Schedule B you list \$14,000.00 in expenditures made to unregistered committees for election day expenses. Please provide further clarification as to the nature of those expenses.

On Schedule C your report discloses loans from Nick J. Rahall. Please clarify whether the amount loaned to the committee was from the candidate's personal funds, or a note obtained from a bank through the candidate. If the loans are from a bank, please provide the name and address of the lending institution and the interest rates and terms of the loans.

78737303652

# ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In Kind,  
Loans, Loan Repayments and Refunds Made)  
Supporting Lines 20a, 21a, and 22a, 22b, and 22c  
of FEC FORM 3

Page 1 of 1  
Number 226

(Use Separate Schedules for  
each numbered line)

10-70403

Name of Candidate or Committee in Full

Keep Nick Rahall In Congress Committee

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Committee For a Better Logan County 527 Stratton St. Logan, W. Va.	For Precinct Organizations and Election Day Expense Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/2/78	5,000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Independent Democrats Committee P. O. Box 810 Logan, W. Va.	For Precinct Organ. & Election Day Expense Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/2/78 5/5/78	3,000.00 2,000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Mingo County Democrat Exec. Rastie Runyon Comm. Williamson, W. Va.	For Precinct Organization & Election Day Expense Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/3/78 5/5/78	2,500.00 1,500.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional)			\$ 14,000.00
TOTAL (Sum of all pages)			\$ 14,000.00

Memo to the File:

Allocation/West Virginia Committees

11/7/79/Greevy

Meeting with Ken Gross

and: Bobby Werfel

Fran Hagan

Rick Halter

Dug Greevy

The above met this day to discuss the proposal which Audit and RAD jointly prepared and submitted to OGC regarding Allocation of Expenses by Party Committees/7/13/79.

Gross stated that Claire Lindsay had written a proposal in response to the Audit/RAD proposal prior to her departure. We discussed the need to have some specific guidelines for committees to follow if in fact we determine that action should be pursued against them.

However, we noted that the Commission thus far has not provided any certain guidance, particularly in the case of GOTV/ voter registration expenses made by committees which do not have segregated accounts.

Gross acknowledged our dilemma. In particular, we stated that there are several referrals received from Audit by RAD regarding WV committees which expended in excess of \$1,000 for GOTV. Based upon various formulas, the committees may or may not have to register with FEC. We stated that we did not think it right to send letters to the committees unless we could be more specific as to why they qualify as political committees.

Gross stated that he would forward to us a copy of the Lindsay proposal, and that he would review the amounts in question for the WV committees.

We are to respond to the Lindsay proposal as soon as possible so that a final decision can be made on this matter.

FYI :

The attached four SV's were referred, without backup, from Audit. The information in the Audit referrals has been incorporated into the SV notices.

---

Can audit provide any backup to attach to these letters?

It seems to me that the U.V.s. letter in particular should have more explanation as to the basis for the allegations.

ABP  
9/11

Please notify the Commission within thirty (30) days from the date of this letter of your decision on this matter. If you have any questions, please contact David Greevy, in our Reports Analysis Division at (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Thomas J. Haselhorst  
Assistant Staff Director

Enclosure



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. Thomas A. Tomblin  
1976 Logan County Democratic  
Campaign Committee  
Justice Addition  
Logan, West Virginia 25601

Dear Mr. Tomblin:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. It has come to our attention that your organization may have made expenditures to influence Federal elections during the calendar year 1976. In particular, your committee appears to have distributed approximately \$19,530 in 1976 for election day expenses.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" for 1976, subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.



REPORTS ANALYSIS REFERRAL SHEET

DATE March 28, 1980 ANALYST Dug Greevy Aug 3/11  
TO: Office of General Counsel TEAM CHIEF Bobby Verfel Rydr  
THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW ea!  
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS PAH

CANDIDATE/COMMITTEE: Committee for a Better Logan County  
TREASURER:  
ADDRESS: 527 Stratton Street  
Logan, West Virginia  
AFFILIATE(S):

ALLEGATION(S): Unregistered Political Committee CITE: 2 U.S.C. 433 & 434 ATTACHMENT(S) A & B

DATE INITIATED: 2/12/79

MANNER IN WHICH REVIEW WAS INITIATED: Referral from Audit Division  
☐ Normal Review ☐ Other: ATTACHMENT A  
☐ Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM \_\_\_\_\_ TO \_\_\_\_\_

TOTAL RECEIPTS \$ \_\_\_\_\_ TOTAL EXPENDITURES \$ \_\_\_\_\_

CASH ON HAND \$ \_\_\_\_\_ DEBTS \$ \_\_\_\_\_

HISTORY:

RESULTS OF REVIEW: ATTACHMENT

None

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT

None

REASON(S) FOR REFERRAL: ATTACHMENT

See Cover Memo: Haselhorst to OGC

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT

None

OTHER RELEVANT INFORMATION: ATTACHMENT

Request for Additional Information, 12/13/78, sent to transferring committee C  
Response Receive to RTAI, 2/14/79 D  
Memo to the File: Greevy, 11/7/79 E  
Letter Prepared to Send to Logan County Committee F

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

None

FORM 100-10

REVISED

January, 1978

FEDERAL ELECTION COMMISSION

1325 K Street, N.W.

Washington, D.C. 20463

(Operating, Transfer Out, Contributions In-Kind,  
Loan, Less Money debts and Inclusions)  
Supporting Lines 10a, 21a, and 22a, 23a, and 23c  
of FEC FORM 3

File Number \_\_\_\_\_

(Use Separate Schedules for  
each numbered line)

Name of Candidate or Committee in Full

**Keo Wick Bahall In Congress Committee**

Full Name, Mailing Address and ZIP Code	Particulars of Expenditures	Date (month, day, year)	Amount of each expenditure this period
<b>Committee For a Better Logan County</b> 527 Stratton St. Logan, W. Va.	<b>For Precinct Organizations and Election Day Expenses</b> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<b>5/2/78</b>	<b>5,000.00</b>
<b>Independent Democrats Committee</b> P. O. Box 810 Logan, W. Va.	<b>For Precinct Organi. &amp; Election Day Expenses</b> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<b>5/2/78</b> <b>5/5/78</b>	<b>3,000.00</b> <b>2,000.00</b>
<b>Wingo County Democrat Exec. Committee</b> 220016 Runyon Williamson, W. Va.	<b>For Precinct Organizations &amp; Election Day Expenses</b> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<b>5/2/78</b> <b>5/5/78</b>	<b>2,500.00</b> <b>1,500.00</b>
Full Name, Mailing Address and ZIP Code	Particulars of Expenditures	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditures	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditures	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditures	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditures	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditures	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		

**\$ 14,000.00**

70011375000



FEDERAL ELECTION COMMISSION

1155 K STREET NW  
WASHINGTON, D.C. 20541

18 DEC 1977

Mr. Anthony P. Gonzalez, Treasurer  
KEEP NICK RAHALL IN CONGRESS COMMITTEE  
P.O. Box 64  
Beckley, West Virginia 25801

Dear Mr. Gonzalez:

This letter is prompted by our interest in assisting House candidates and committees who wish to comply with the Federal Election Campaign Act.

During review of the 30 Day Post Primary Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

The Federal Election Commission, in connection with its statutory responsibility to enforce the Act, reviews all Federal campaign disclosure documents, including those filed initially with the Clerk of the House. The Office of the Clerk, as an informational service, is notifying filers of the errors and omissions found in their preliminary review of documents filed with the Clerk. This letter and attached documentation constitute official notification by the Commission of errors and omissions found, and require a written response.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Clerk of the House, Office of Records and Registration, 1036 Longworth HOB, Washington, D.C. 20515, with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Beth Holland in our Reports Analysis Division on the toll free number (800)-424-9530. Our local number is (202)523-4172.

Sincerely,

*Orlando S. Potter*

Orlando S. Potter  
Staff Director

Attachment:  
FEC Form 12

FEDERAL ELECTION COMMISSION  
1325 K Street, N.W.  
Washington, D.C. 20463

BP/4

TO: KEEP NICK RAIWALL IN CONGRESS COMMITTEE W/04

DATE: 18 DEC 1978

I.D. NO.: CD0081356

REQUEST FOR ADDITIONAL INFORMATION FOR THE 30 Day Post Primary REPORT OF RECEIPTS  
AND EXPENDITURES COVERING THE PERIOD 4/25/78 THROUGH 5/29/78.  
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please  
return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

- ☐ Coverage Dates: ☐ omitted or ☐ incorrect
- ☐ Summary Page Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☐ Detailed Summary (Page 2) Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☐ Schedule Totals: ☐ disagree with Detailed Summary (Page 2) or ☐ omitted
- ☐ Date(s): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Full Name(s)/Mailing Address(es): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Occupation/Principal Place(s) of Business: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Election Designation: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Aggregate Year-to-Date Totals: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Nature or Purpose of Expenditure: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Nature or Purpose of Receipt: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Inadequate Description of: ☐ proceeds ☐ dates ☐ events ☐ location of Schedule
- ☐ Signature: ☐ omitted ☐ inadequate
- 11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.*

☒ Other: Please see Page Two

Your initial submission(s), together with this request for additional information, has been made available for  
public inspection. The Commission urges you to file the additional submission(s) promptly to the above address.  
If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-  
9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House)  
or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St.,  
N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of  
Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

BP/4

**REQUEST FOR ADDITIONAL INFORMATION - PAGE TWO  
KEEP NICK RAHALL IN CONGRESS COMMITTEE  
30 DAY POST PRIMARY REPORT**

On Schedule B you list \$14,000.00 in expenditures made to unregistered committees for election day expenses. Please provide further clarification as to the nature of those expenses.

On Schedule C your report discloses loans from Nick J. Rahall. Please clarify whether the amount loaned to the committee was from the candidate's personal funds, or a note obtained from a bank through the candidate. If the loans are from a bank, please provide the name and address of the lending institution and the interest rates and terms of the loans.



## FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

February 12, 1979

MEMORANDUM

TO: TOM HASELHORST

FROM: *RP* BOB COSTA/*JS* JOE STOLTZ

SUBJECT: UNREGISTERED POLITICAL ORGANIZATION

During a recent audit of the West Virginia State Democratic Telethon Committee, the Audit staff was presented with a copy of a State disclosure report of the 1976 Logan County Democratic Campaign Committee ("the County Committee") (Attachment #1), an unregistered political organization.

Based upon a review of the report as outlined below, it is the opinion of the Audit staff that the County Committee has engaged in activity which would require it to register and report in accordance with Sections 433 and 434 of Title 2 of the United States Code.

Registration and Reporting by a Political Committee

Section 433(a) of Title 2 of the United States Code requires each political committee which anticipates receiving contributions or making expenditures during the calendar year in an aggregate amount or value exceeding \$1,000 to file with the Commission a statement of organization within 10 days following the date of the anticipation.

Section 434(a) of Title 2 of the United States Code requires the treasurer of a political committee to file with the Commission reports of receipts and expenditures on prescribed or approved forms.

Our review of the State report revealed a fundraising event held October 28, 1976 which netted proceeds of \$19,350.00. The proceeds of the event were disbursed by the County Committee to district coordinators for distribution to precinct captains for the purposes set forth in Chapter 3, Article 8, Section 9 of the Code of West Virginia. According to a representative of the West Virginia Attorney General's office, the section of the code





cited above deals with expenditures of a political committee, a portion of which deals specifically with election day expenses.

It is the opinion of the Audit staff, based upon the information presented, that the distribution mentioned above was made for Get-Out-The Vote activities. As such, according to Advisory Opinion 1978-10, the County Committee would normally be required to allocate the activity between Federal and non-Federal elections on a reasonable basis. It appears reasonable that the portion allocated for Federal elections would exceed \$1,000. As such, the County Committee would normally be required to register and report in accordance with Sections 433 and 434. Therefore, the matter is referred to your Division for consideration along with the matter referred on November 30, 1978 (Attachment #2).

Any questions concerning the matter should be communicated to Ray Lisi on extension 3-4060 or Charlie Hanshaw on extension 3-4155.

Attachments as stated



## Statement of Receipts and Expenditures for Candidates, Agents, Treasurers or Committees

This statement is required to be filed according to the provisions of West Virginia Code §3-8-5 within 30 days after the date of the Election with the Secretary of State, Charleston, West Virginia, for all offices to be filled or issues to be voted upon by the voters of a political division greater than a county. For all offices to be filled or issues to be voted upon by the voters of a county or district therein, file this statement with the County Clerk. For all offices to be filled or issues to be voted upon by the voters of a city, file this statement with the City Clerk or Recorder. This statement has been prepared by James R. McCartney, Secretary of State of West Virginia, pursuant to the provisions of West Virginia Code §3-8-6.

(A)

Full Name of Candidate, Agent, Treasurer or Committee Thomas A. Tomblin  
(First) (Middle Initial) (Last)

Candidate for, or Agent, Treasurer or Committee in support of the following candidate or cause 1976 Logan County Democratic Campaign Committee  
(Office sought, or candidate or cause supported)  
Logan County  
(District or Circuit if any)

Party Affiliation (if any) Democratic

Residence Justice Addition Box 813  
(Number) (Street) (Street Address or Box Number)

Logan, West Virginia 25601 Logan, West Virginia 25601  
(Town or City) (Zip) (Town or City) (Zip)

Residence Telephone 752-2219 Business Telephone 752-3100

(B)

The balance of cash and any other sum of money on hand at the beginning of the period covered by this financial statement is \$ 10,761.25  
The balance of cash and any other sum of money on hand at the end of the period covered by this financial statement is \$ 342.81

(C)

I hereby certify that the following is a true, complete, and itemized statement of all monies and other tangible things of value contributed or advanced by anyone, together with the full names of all such persons, firms, associations or committees who have made advances or contributions, provided that any contribution totaling more than fifty dollars (\$50.00) by any one contributor is by money order or by check.

## CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
11-1-76	Mike Hill	\$ 50.00			\$
11-1-76	Claude Ellis	50.00			
11-1-76	Swanzy Evans	50.00			
11-1-76	Paul White	50.00			
11-1-76	David White	50.00			

Any additional pages needed for other contributions of \$250 or less must include all of the above requested information.

TOTAL \$ 250.00

(Residence, Mailing Address, Business and Occupation must be listed)

DATE	NAME OF CONTRIBUTOR (First, M. L., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
	Mrs. Amos Doss	Box 77 Wilkinson, W. Va.	Grocery	\$1,000.00
	Joe Dingess	Box 987 Chapmanville, W.Va.	Contractor	1,500.00
	Donald D. Lambert	Kistler, West Va.	Foreman	300.00
	Logan County Democratic Executive Committee	Logan, W.Va.		500.00
TOTAL				\$3,300.00

Any additional pages needed for other contributions exceeding \$250 must include all of the above requested information.

(D)

I further certify that the following is a true, complete, and itemized statement of every FUND RAISING EVENT held during the period covered by this financial statement. A FUND RAISING EVENT means any event such as a dinner, reception, testimonial, cocktail party, auction or similar affair through which contributions are solicited or received by such means as purchase of a ticket, payment of an attendance fee or through purchase of goods and services.

### FUND RAISING EVENTS

Date of Event	October 28, 1976	Date of Event	
Type of Event	Hoot Owl Buffett	Type of Event	
Address of Place Held	Henlawson, West Va.	Address of Place Held	
Name of Place Held	Chief Logan State Park Restaurant	Name of Place Held	
Total Expenditures	\$ 2,169.94	Total Expenditures	\$
Net Receipts	\$ 19,350.00	Net Receipts	\$

Date of Event		Date of Event	
Type of Event		Type of Event	
Address of Place Held		Address of Place Held	
Name of Place Held		Name of Place Held	
Total Expenditures	\$	Total Expenditures	\$
Net Receipts	\$	Net Receipts	\$

Any additional pages needed for Fund Raising Events must include all of the above requested information.

**FUND RAISING EVENT**

**CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS**

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
10-29-76	D. R. Winters	\$100.00			\$
10-29-76	Denver Mathis	100.00			
10-29-76	Leonard Ware	100.00			
10-29-76	Sammy Dalton	100.00			
10-29-76	Patricia Richmond	100.00			
10-29-76	Doris J. Hall	100.00			
10-29-76	Deanna Lynn Bryant	200.00			
10-29-76	Howard Dalton	200.00			
10-29-76	Phillip R. Cadd	100.00			
10-29-76	Opal Williamson	100.00			
10-29-76	Opal Combs	100.00			

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL \$ 1,300.00

**FUND RAISING EVENT**

**CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EXCEED \$250  
(Residence, Mailing Address, Business and Occupation must be listed)**

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
10-29-76	James A. Trent	Box 145 Wilkinson, W.Va.	Machinist	\$ 1,000.00
10-29-76	George Albright, Jr.	Box 776 Logan, West Va.	Manager	400.00
10-29-76	Woodrow Lowe	613 Stratton Street Logan, West Va.	Circuit Clerk	700.00
10-29-76	J. Thomas Godby	427 Circle Drive Logan, West Va.	Assessor	400.00
10-29-76	Ervin S. Queen	West Logan, W.Va.	Self-employed	1,000.00
10-29-76	Enos Ramey	Box 37 Switzer, W.Va.	Grocery	500.00
10-29-76	Ralph Grimmett	Kistler, W.Va.	Self-employed	800.00
10-29-76	James N. Grubb	313 West Avis Avenue Man, W.Va.	Attorney	700.00
10-29-76	Andy Sos	Box 11 McConnell, W.Va.	service station operator	600.00

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL \$ 6,100.00

(E)

I further certify that all contributions received during the period covered by this financial statement have been reported above in Section C or Section D or both, and that the total amount of all such contributions is \$ \$22,900.00

I further certify that the following is a true, complete, and itemized statement showing the date, amount and purpose of each expenditure made or liability incurred, together with the full name, residence and mailing address of each person, firm, association, or committee to whom each expenditure was made or liability incurred, and the total amount of such expenditures made and liabilities incurred during the period covered by this statement.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
10-15-76	Logan Banner	Logan, West Virginia	1,170.00
10-28-76	Logan News Printers	Logan, West Virginia	18.75
10-29-76	Park Restaurant	Logan, West Virginia	1,733.75
11-1-76	Logan Bank & Trust	Logan, W. Va. - 18,827.00	250.00 cash
	*TO DISTRICT COORDINATORS to distribute to precinct captains for the purposes set forth in Chapter 3, Article 8, Section 9, of the Code of West Virginia.		19,077.00 *
	<u>DISTRIBUTED TO</u>	<u>AMOUNT</u>	
	Ralph Grimmett	3,750.00	
	Ralph Grimmett	1,100.00	
	Claude Ellis & Swansey Evans	5,100.00	
	Michall H. Hill & Vernon Dingess	4,150.00	
	Harold Hale	3,600.00	
	Claude Ellis	1,377.00	
		<u>\$19,077.00</u>	
11-8-76	Logan Coca-Cola Bot. Co.	Logan, West Va.	24.00
11-8-76	Logan News Printers	Logan, West Va.	300.00
11-29-76	Logan News Printers	Logan, West Va.	97.50
11-29-76	Jean Queen	West Logan, West Va.	136.19
Any additional pages needed for other expenditures must include all of the above requested information.			TOTAL \$ 22,557.19

(G)

I further certify that this statement lists all financial transactions, as reported above in Sections C, D, and F, for the period beginning on the 28th day of October, 19 76, and ending on the 1st day of December, 19 76.

(H)

I further certify that the total expenditure for the nomination, election or defeat of my candidacy (or any person or organization advocating or opposing the nomination, election or defeat of any candidate), or the passage or defeat of any issue, thing or item to be voted upon, in whose behalf an expenditure was made

or a contribution was given for the Election is \$ 22,557.19

This total includes all expenditures made as of the date of this statement, including all expenditures previously reported in other statements.)

### OATH OR AFFIRMATION

State of West Virginia

County of Logan, ss.

Thomas A. Tomblin, being duly sworn, deposes and says that the foregoing is a true and correct statement, to the best of his knowledge and belief, of all financial transactions occurring within the period covered by this statement.

Signature of Candidate, Agent, or Treasurer

Subscribed and sworn to before me this 2nd day of December, 19 76

Notary Public

My Commission expires on the 5th day of April, 19 78





Statement of Receipts and Expenditures for Candidates, Agents, Treasurers or Committees

This statement is required to be filed according to the provisions of West Virginia Code §3-8-5 within 30 days after the date of the Election with the Secretary of State, Charleston, West Virginia, for all offices to be filled or issues to be voted upon by the voters of a political division greater than a county. For all offices to be filled or issues to be voted upon by the voters of a county or district therein, file this statement with the County Clerk. For all offices to be filled or issues to be voted upon by the voters of a city, file this statement with the City Clerk or Recorder. This statement has been prepared by James R. McCartney, Secretary of State of West Virginia, pursuant to the provisions of West Virginia Code §3-8-6.

(A)

Full Name of Candidate, Agent, Treasurer or Committee Thomas A. Tomblin  
(First) (Middle Initial) (Last)

Candidate for; or Agent, Treasurer or Committee in support of the following candidate or cause 1976 Logan County Democratic Campaign Committee  
(Office sought; or candidate or cause supported)  
Logan County  
(District or Circuit if any)

Party Affiliation (if any) Democratic

Residence Justice Addition Box 813  
(Number) (Street) (Street Address or Box Number)  
Logan, West Virginia 25601 Logan, West Virginia 25601  
(Town or City) (Zip) (Town or City) (Zip)  
Residence Telephone 752-2219 Business Telephone 752-3100

(B)

The balance of cash and any other sum of money on hand at the beginning of the period covered by this financial statement is \$ 10,761.25  
The balance of cash and any other sum of money on hand at the end of the period covered by this financial statement is \$ 342.81

(C)

I hereby certify that the following is a true, complete, and itemized statement of all monies and other tangible things of value contributed or advanced by anyone, together with the full names of all such persons, firms, associations or committees who have made advances or contributions, provided that any contribution totaling more than fifty dollars (\$50.00) by any one contributor is by money order or by check.

CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
11-1-76	Mike Hill	\$ 50.00			\$
11-1-76	Claude Ellis	50.00			
11-1-76	Swanzy Evans	50.00			
11-1-76	Paul White	50.00			
11-1-76	David White	50.00			

Any additional pages needed for other contributions of \$250 or less must include all of the above requested information.

TOTAL \$ 250.00



(Residence, Mailing Address, Business and Occupation must be listed)

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
	Mrs. Amos Doss	Box 77 Wilkinson, W. Va.	Grocery	\$1,000.00
	Joe Dingess	Box 987 Chapmanville, W.Va.	Contractor	1,500.00
	Donald D. Lambert	Kistler, West Va.	Foreman	300.00
	Logan County Democratic Executive Committee	Logan, W.Va.		500.00
TOTAL				\$3,300.00

Any additional pages needed for other contributions exceeding \$250 must include all of the above requested information.

(D)

I further certify that the following is a true, complete, and itemized statement of every FUND RAISING EVENT held during the period covered by this financial statement. A FUND RAISING EVENT means any event such as a dinner, reception, testimonial, cocktail party, auction or similar affair through which contributions are solicited or received by such means as purchase of a ticket, payment of an attendance fee or through purchase of goods and services.

#### FUND RAISING EVENTS

Date of Event	October 28, 1976	Date of Event	
Type of Event	Hoot Owl Buffett	Type of Event	
Address of Place Held	Henlawson, West Va.	Address of Place Held	
Name of Place Held	Chief Logan State Park Restaurant	Name of Place Held	
Total Expenditures	\$ 2,169.94	Total Expenditures	\$
Net Receipts	\$ 19,350.00	Net Receipts	\$

Date of Event		Date of Event	
Type of Event		Type of Event	
Address of Place Held		Address of Place Held	
Name of Place Held		Name of Place Held	
Total Expenditures	\$	Total Expenditures	\$
Net Receipts	\$	Net Receipts	\$

Any additional pages needed for Fund Raising Events must include all of the above requested information.

# CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	
10-29-76	D. R. Winters	\$100.00			\$
10-29-76	Denver Mathis	100.00			
10-29-76	Leonard Ware	100.00			
10-29-76	Sammy Dalton	100.00			
10-29-76	Patricia Richmond	100.00			
10-29-76	Doris J. Hall	100.00			
10-29-76	Deanna Lynn Bryant	200.00			
10-29-76	Howard Dalton	200.00			
10-29-76	Phillip R. Cadd	100.00			
10-29-76	Opal Williamson	100.00			
10-29-76	Opal Combs	100.00			

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL \$ 1,300.00

## FUND RAISING EVENT

### CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EXCEED \$250 (Residence, Mailing Address, Business and Occupation must be listed)

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
10-29-76	James A. Trent	Box 145 Wilkinson, W.Va.	Machinist	\$ 1,000.00
10-29-76	George Albright, Jr.	Box 776 Logan, West Va.	Manager	400.00
10-29-76	Woodrow Lowe	613 Stratton Street Logan, West Va.	Circuit Clerk	700.00
10-29-76	J. Thomas Godby	427 Circle Drive Logan, West Va.	Assessor	400.00
10-29-76	Ervin S. Queen	West Logan, W.Va.	Self-employed	1,000.00
10-29-76	Enos Ramey	Box 37 Switzer, W.Va.	Grocery	500.00
10-29-76	Ralph Grimmett	Kistler, W.Va.	Self-employed	800.00
10-29-76	James N. Grubb	313 West Avis Avenue Man, W.Va.	Attorney	700.00
10-29-76	Andy Sos	Box 11 McConnell, W.Va.	service station operator	600.00

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL \$ 6,100.00

(E)

I further certify that all contributions received during the period covered by this financial statement have been reported above in Section C or Section D or both, and that the total amount of all such contributions

is \$ 22,900.00

November 30,

MEMO TO THE FILE


During the course of the audit of the West Virginia State Democratic Telethon Committee, the auditors performed a cursory review of disclosure reports filed by candidates for Federal office from the State of West Virginia to determine whether all transfers had been disclosed in accordance with 2 U.S.C. 434(b)(4).

As a result of the trace, it was determined that the Keep Nick Rahall In Congress Committee made the following transfers to unregistered political groups within West Virginia for apparent Get Out The Vote Activities:

Committee For a Better Logan County	5-02-78	\$5,000.00
✓ Independent Democrats Committee (Logan County)	5-02-78	3,000.00
- Independent Democrats Committee (Logan County)	5-05-78	2,000.00
Mingo County Democratic Executive Committee	5-03-78	2,500.00
Mingo County Democratic Executive Committee	5-05-78	1,500.00

Since this activity totally involves committees not within the scope of the West Virginia State Democratic Telethon Committee audit, the activity was mentioned to the Reports Analysts responsible for reviewing reports of West Virginia Committees to make them aware of the situation in order that they may deem it necessary to pursue the recipient committees as unregistered committees.

cc: ~~Tom~~ Haselhorst,  
Assistant Staff Director  
for Reports Analysis



I hereby certify that the following is a true, complete, and itemized statement showing the date, amount and purpose of each expenditure made or liability incurred, together with the full name, residence and mailing address of each person, firm, association, or committee to whom each expenditure was made or liability incurred, and the total amount of such expenditures made and liabilities incurred during the period covered by this statement.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
10-15-76	Logan Banner	Logan, West Virginia	1,170.00
10-22-76	Logan News Printers	Logan, West Virginia	\$ 18.75
10-29-76	Park Restaurant	Logan, West Virginia	1,733.75
11-1-76	Logan Bank & Trust	Logan, W. Va. - 18,827.00	250.00 cash
	*TO DISTRICT COORDINATORS to distribute to precinct captains for the purposes set forth in Chapter 3, Article 8, Section 9, of the Code of West Virginia.		19,077.00 *
	DISTRIBUTED TO	AMOUNT	
	Ralph Grimmett	3,750.00	
	Ralph Grimmett	1,100.00	
	Claude Ellis & Swansey Evans	5,100.00	
	Michall H. Hill & Vernon Dingess	4,150.00	
	Harold Hale	3,600.00	
	Claude Ellis	1,377.00	
		\$19,077.00	
11-8-76	Logan Coca-Cola Bot. Co.	Logan, West Va.	24.00
11-8-76	Logan News Printers	Logan, West Va.	300.00
11-29-76	Logan News Printers	Logan, West Va.	97.50
11-29-76	Jean Queen	West Logan, West Va.	136.19
Any additional pages needed for other expenditures must include all of the above requested information.			
TOTAL			\$ 22,557.19

(G)

I further certify that this statement lists all financial transactions, as reported above in Sections C, D, and F, for the period beginning on the 28th day of October, 19 76, and ending on the 1st day of December, 19 76.

(H)

I further certify that the total expenditure for the nomination, election or defeat of my candidacy (or any person or organization advocating or opposing the nomination, election or defeat of any candidate), or the passage or defeat of any issue, thing or item to be voted upon, in whose behalf an expenditure was made

or a contribution was given for the Election is \$ 22,557.19

(This total includes all expenditures made as of the date of this statement, including all expenditures previously reported in other statements.)

### OATH OR AFFIRMATION

State of West Virginia

County of Logan, ss.

Thomas A. Tomblin, being duly sworn, deposes and says that the foregoing is a true and correct statement, to the best of his knowledge and belief, of all financial transactions occurring within the period covered by this statement.

Signature of Candidate, Agent, or Treasurer

Subscribed and sworn to before me this 2nd day of December, 19 76

Notary Public

My Commission expires on the 5th day of April, 19 78

REQUEST FOR ADDITIONAL INFORMATION - PAGE TWO  
KEEP NICK RAHALL IN CONGRESS COMMITTEE  
30 DAY POST PRIMARY REPORT

On Schedule B you list \$14,000.00 in expenditures made to unregistered committees for election day expenses. Please provide further clarification as to the nature of those expenses.

On Schedule C your report discloses loans from Nick J. Rahall. Please clarify whether the amount loaned to the committee was from the candidate's personal funds, or a note obtained from a bank through the candidate. If the loans are from a bank, please provide the name and address of the lending institution and the interest rates and terms of the loans.

789303532



**ITEMIZED EXPENDITURES**  
(Operating, Transfers Out, Contributions In Kind,  
Loans, Loan Repayments and Refunds Made)  
Supporting Lines 20a, 21a, and 22a, 22b, and 22c  
of FEC FORM 3

(Use Separate Schedules for  
each numbered line)

U.C. 70403

Name of Candidate or Committee in Full	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Keep Nick Rahall In Congress Committee Committee For a Better Logan County 527 Stratton St. Logan, W. Va.	For Precinct Organizations and Election Day Expense Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/2/78	5,000.00
Independent Democrats Committee P. O. Box 810 Logan, W. Va.	For Precinct Organ. & Election Day Expense Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/2/78 5/5/78	3,000.00 2,000.00
Mingo County Democrat Exec. Comm. Rastie Runyon Williamson, W. Va.	For Precinct Organization & Election Day Expense Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/3/78 5/5/78	2,500.00 1,500.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures (this page optional)			\$ 14,000.
TOTAL of expenditures (all pages)			\$ 14,000.



# Congressman Nick Rahall

REGULAR MAIL  
5319

February 14, 1979

16 PM 3:09

The Honorable Edmund L. Henshaw, Jr.  
Clerk of the House  
Room 1036 Longworth Building  
Washington, D. C.

Dear Mr. Henshaw:

My Campaign Treasurer, Anthony P. Gonzalez, has received several requests from the Federal Elections Commission to make certain clarifications to reports filed by both of my campaign committees - the Keep Nick Rahall In Congress Committee (#069965) and the Nick J. Rahall For Congress Committee (#05319). With your permission I will answer those requests in this letter as Mr. Gonzalez is not available at this time, and when he returns he will forward a letter to you verifying the information contained in this letter. 058319

1) On August 25, 1978 the Commission requested clarification to the 10 day Pre-Primary Report for the Keep Nick Rahall In Congress Committee regarding a contribution listed as being received from the firm of Thornhill, Kennedy, and Vaughan on April 6, 1978 in the amount of \$500.00. Please correct the record to reflect:

- Warren A. Thornhill, III of 800 Woodlawn Avenue, Beckley, West Virginia, who is an attorney located in the Raleigh County National Bank Building in Beckley, West Virginia contributed \$166.67 to my Campaign Committee on April 6, 1978. His aggregate contributions to the date of the report were \$166.67.

- David T. Kennedy of 102 Mollohan Drive, Beckley, West Virginia who is an attorney located in the Raleigh County National Bank Building in Beckley, West Virginia contributed \$166.66 to my Campaign Committee on April 6, 1978 and that his aggregate contributions to the date of the report were \$166.66.

- James F. Vaughan, Jr. of 109 College Avenue, Beckley, West Virginia who is also an attorney with offices in the Raleigh County National Bank Building in Beckley, West Virginia contributed \$166.66 to the Committee on April 6, 1978, and his aggregate contributions to the date of the report were \$166.66

P.O. Box 64, Beckley, West Virginia 25801

A copy of our report is filed with and available for purchase from the Federal Election Commission, Washington, D.C. 20463.

2) On November 13, 1978 the Commission requested additional information from the Nick Joe Rahall For Congress Committee concerning their October 10, 1978 Report which showed an expenditure to the U.S. Postmaster as a "debt". The word "debt" which appears below the typed explanation of the expenditure was a typographical error on the part of the typist. The notation was an "in-house" note marking that the mailings were for contributions to retire the "debt". The Committee was not indebted to the U.S. Postmaster. Please correct the record to have the word "debt" deleted as it is irrelevant to the report.

3) On December 18, 1978 the Commission requested clarification to the Keep Nick Rahall In Congress Committee 30 Day Post Primary Report in two instances:

a) Further clarification as to the nature of the expenses of the Committees to which the Committee paid \$14,000 for "election day expense".

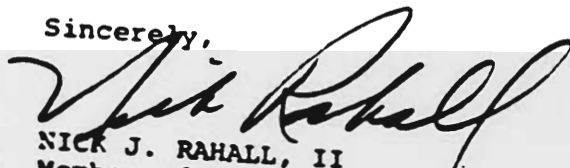
The monies "transferred" to the three political committees were to help defray the expenses the Committee had in the three counties for such things as signs, sample ballots, expenses for vehicles taking voters to the polls, and a 'get out the vote' type operation. It would be impossible for the Committee - the donor, to list specifically in each instance as to how the money donated was spent as the contributions were made to help defray the cost for the committee within the county. Further information on how the money was exactly spent will have to come from the committees.

b) The Commission requested further information on the personal loans the Candidate made to the Committee. Attached are new Schedule "C" forms which reflect the information requested.

I trust the above and the attached satisfies the requests made by the Commission and we will be happy to furnish additional information if further clarification is necessary.

With warm regard, I am

Sincerely,

  
NICK J. RAHALL, II  
Member of Congress

NJR/jmk  
Enclosures

Memo to the File:

Allocation/West Virginia Committees  
11/7/79/Greevy  
Meeting with Ken Gross  
and: Bobby Werfel  
Fran Hagan  
Rick Halter  
Dug Greevy

The above met this day to discuss the proposal which Audit and RAD jointly prepared and submitted to OGC regarding Allocation of Expenses by Party Committees/7/13/79.

Gross stated that Claire Lindsay had written a proposal in response to the Audit/RAD proposal prior to her departure. We discussed the need to have some specific guidelines for committees to follow if in fact we determine that action should be pursued against them.

However, we noted that the Commission thus far has not provided any certain guidance, particularly in the case of GOTV/ voter registration expenses made by committees which do not have segregated accounts.

Gross acknowledged our dilemma. In particular, we stated that there are several referrals received from Audit by RAD regarding WV committees which expended in excess of \$1,000 for GOTV. Based upon various formulas, the committees may or may not have to register with FEC. We stated that we did not think it right to send letters to the committees unless we could be more specific as to why they qualify as political committees.

Gross stated that he would forward to us a copy of the Lindsay proposal, and that he would review the amounts in question for the WV committees.

We are to respond to the Lindsay proposal as soon as possible so that a final decision can be made on this matter.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Treasurer  
Committee for a Better  
Logan County  
527 Stratton Street  
Logan, West Virginia

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. It has come to our attention that your organization may have made expenditures to influence Federal elections during the calendar year 1978. In particular, your committee appears to have received \$5,000 from the Keep Nick Rahall in Congress Committee. These funds may have been used for get-out-the-vote activities. A copy of that portion of the report is attached.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" for 1978, subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.



Please notify the Commission within thirty (30) days from the date of this letter of your decision on this matter. If you have any questions, please contact David Greevy, in our Reports Analysis Division at (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Thomas J. Haselhorst  
Assistant Staff Director

Enclosure

REPORTS ANALYSIS REFERRAL SHEET

DATE March 28, 1980 ANALYST Dug Greevy  
 TO: Office of General Counsel TEAM CHIEF Bobby Werfel  
 THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW (B)  
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS [Signature]

CANDIDATE/COMMITTEE: Mingo County Democratic Executive Committee  
 TREASURER:  
 ADDRESS: c/o Pastie Runyon  
 Williamson, WV  
 AFFILIATE(S):

ALLEGATION(S): CITE: ATTACHMENT(S)  
 Unregistered Political Committee 2 U.S.C. 433 & 434 A & B

DATE INITIATED: 2/12/79

MANNER IN WHICH REVIEW WAS INITIATED: Referral from Audit Division  
☐ Normal Review ☐ Other: ATTACHMENT A  
☐ Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM TO

TOTAL RECEIPTS \$ TOTAL EXPENDITURES \$

CASH ON HAND \$ DEBTS \$

HISTORY:

RESULTS OF REVIEW: ATTACHMENT

None

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT

None

REASON(S) FOR REFERRAL: ATTACHMENT

See Cover Memo: Haselhorst to OGC

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT

None

OTHER RELEVANT INFORMATION: ATTACHMENT

Request for Additional Information, 12/13/78, sent to transferring committee C  
 Response Received to PFAI, 2/14/79 D  
 Memo to the File: Greevy, 11/7/79 E  
 Letter Prepared to Send to Mingo County Committee F

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

None



**SCHEDULE B**  
**REVISED**  
 January, 1978  
 Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20463

**ITEMS TO BE REPORTED**  
 (Contributions, Transfers Out, Contributions In-Kind,  
 Loans, Loan Repayments and Refunds Made)  
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c  
 of FEC FORM 3

Line Number \_\_\_\_\_  
 (Use Separate Schedule for  
 each numbered line.)

Name of Candidate or Committee in Full

**Kero Hick Bohall In Congress Committee**

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
<b>Committee For a Better Logan County</b> 527 Stratton St. Logan, W. Va.	<b>For Precinct Organizations and Election Day Expenses</b> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/2/78	5,000.00
<b>Independent Democrats Committee</b> P. O. Box 310 Logan, W. Va.	<b>For Precinct Comm. &amp; Election Day Expenses</b> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/2/78 5/5/78	3,000.00 2,000.00
<b>Hingo County Democrat Exec. Committee</b> Hattie Runyon Williamson, W. Va.	<b>For Precinct Organizations &amp; Election Day Expenses</b> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/2/78 5/5/78	2,500.00 1,500.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period

8 14 000.00

73011375000



FEDERAL ELECTION COMMISSION

1155 A STREET NW  
WASHINGTON, D.C. 20461

18 DEC 1977

Mr. Anthony P. Gonzalez, Treasurer  
KEEP NICK RAHALL IN CONGRESS COMMITTEE  
P.O. Box 64  
Beckley, West Virginia 25801

Dear Mr. Gonzalez:

This letter is prompted by our interest in assisting House candidates and committees who wish to comply with the Federal Election Campaign Act.

During review of the 30 Day Post Primary Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

The Federal Election Commission, in connection with its statutory responsibility to enforce the Act, reviews all Federal campaign disclosure documents, including those filed initially with the Clerk of the House. The Office of the Clerk, as an informational service, is notifying filers of the errors and omissions found in their preliminary review of documents filed with the Clerk. This letter and attached documentation constitute official notification by the Commission of errors and omissions found, and require a written response.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Clerk of the House, Office of Records and Registration, 1036 Longworth HOB, Washington, D.C. 20515, with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Beth Holland in our Reports Analysis Division on the toll free number (800) 435-9530. Our local number is (202) 523-4172.

Sincerely,

*Orlando B. Potter*

Orlando B. Potter  
Staff Director

Attachment  
FEC Form 12

FEDERAL ELECTION COMMISSION  
1325 K Street, N.W.  
Washington, D.C. 20463

BF/4

TO: KEEP NICK RAVALL IN CONGRESS COMMITTEE W/06

DATE: 18 DEC 1978

I.D. NO.: 00001356

REQUEST FOR ADDITIONAL INFORMATION FOR THE 30 Day Post Primary REPORT OF RECEIPTS  
AND EXPENDITURES COVERING THE PERIOD 4/25/78 THROUGH 5/29/78,  
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please  
return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

- ☐ Coverage Dates: ☐ omitted or ☐ incorrect
- ☐ Summary Page Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☐ Detailed Summary (Page 2) Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☐ Schedule Totals: ☐ disagree with Detailed Summary (Page 2) or ☐ omitted
- ☐ Date(s): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Full Name(s) Mailing Address(es): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Occupation/Principal Place(s) of Business: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Election Designation: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Aggregate Year-to-Date Totals: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Nature or Purpose of Expenditure: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Nature or Purpose of Receipt: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Inadequate Description of: ☐ proceeds ☐ dates ☐ events ☐ location of Schedule
- ☐ Signature: ☐ omitted ☐ inadequate
- 11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.*

☒ Other: Please see Page Two

Your initial submission(s), together with this request for additional information, has been made available for  
public inspection. The Commission urges you to file the additional submission(s) promptly to the above address.  
If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-  
9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-8170 (House)  
or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St.,  
N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of  
Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

BP/4

**REQUEST FOR ADDITIONAL INFORMATION - PAGE TWO**  
**KEEP NICK RAHALL IN CONGRESS COMMITTEE**  
**30 DAY POST PRIMARY REPORT**

On Schedule B you list \$14,000.00 in expenditures made to unregistered committees for election day expenses. Please provide further clarification as to the nature of those expenses.

On Schedule C your report discloses loans from Nick J. Rahall. Please clarify whether the amount loaned to the committee was from the candidate's personal funds, or a note obtained from a bank through the candidate. If the loans are from a bank, please provide the name and address of the lending institution and the interest rates and terms of the loans.



## FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

February 12, 1979

MEMORANDUM

TO: TOM HASELHORST

FROM: *RC* BOB COSTA/JOE STOLTZ *JS*

SUBJECT: UNREGISTERED POLITICAL ORGANIZATION

During a recent audit of the West Virginia State Democratic Telethon Committee, the Audit staff was presented with a copy of a State disclosure report of the 1976 Logan County Democratic Campaign Committee ("the County Committee") (Attachment #1), an unregistered political organization.

Based upon a review of the report as outlined below, it is the opinion of the Audit staff that the County Committee has engaged in activity which would require it to register and report in accordance with Sections 433 and 434 of Title 2 of the United States Code.

Registration and Reporting by a Political Committee

Section 433(a) of Title 2 of the United States Code requires each political committee which anticipates receiving contributions or making expenditures during the calendar year in an aggregate amount or value exceeding \$1,000 to file with the Commission a statement of organization within 10 days following the date of the anticipation.

Section 434(a) of Title 2 of the United States Code requires the treasurer of a political committee to file with the Commission reports of receipts and expenditures on prescribed or approved forms.

Our review of the State report revealed a fundraising event held October 28, 1976 which netted proceeds of \$19,350.00. The proceeds of the event were disbursed by the County Committee to district coordinators for distribution to precinct captains for the purposes set forth in Chapter 3, Article 8, Section 9 of the Code of West Virginia. According to a representative of the West Virginia Attorney General's office, the section of the code





cited above deals with expenditures of a political committee, a portion of which deals specifically with election day expenses.

It is the opinion of the Audit staff, based upon the information presented, that the distribution mentioned above was made for Get-Out-The Vote activities. As such, according to Advisory Opinion 1978-10, the County Committee would normally be required to allocate the activity between Federal and non-Federal elections on a reasonable basis. It appears reasonable that the portion allocated for Federal elections would exceed \$1,000. As such, the County Committee would normally be required to register and report in accordance with Sections 433 and 434. Therefore, the matter is referred to your Division for consideration along with the matter referred on November 30, 1978 (Attachment #2).

Any questions concerning the matter should be communicated to Ray Lisi on extension 3-4060 or Charlie Hanshaw on extension 3-4155.

Attachments as stated





## Statement of Receipts and Expenditures for Candidates, Agents, Treasurers or Committees

This statement is required to be filed according to the provisions of West Virginia Code §3-8-5 within 30 days after the date of the Election with the Secretary of State, Charleston, West Virginia, for all offices to be filled or issues to be voted upon by the voters of a political division greater than a county. For all offices to be filled or issues to be voted upon by the voters of a county or district therein, file this statement with the County Clerk. For all offices to be filled or issues to be voted upon by the voters of a city, file this statement with the City Clerk or Recorder. This statement has been prepared by James R. McCartney, Secretary of State of West Virginia, pursuant to the provisions of West Virginia Code §3-8-6.

(A)

Full Name of Candidate, Agent, Treasurer or Committee Thomas A. Tomblin  
(First) (Middle Initial) (Last)

Candidate for; or Agent, Treasurer or Committee in support of the following candidate or cause 1976 Logan County Democratic Campaign Committee  
(Office sought, or candidate or cause supported)

Logan County  
(District or Circuit if any)

Party Affiliation (if any) Democratic

Residence Justice Addition Mailing Address Box 813  
(Number) (Street) (Street Address or Box Number)

Logan, West Virginia 25601 Logan, West Virginia 25601  
(Town or City) (Zip) (Town or City) (Zip)

Residence Telephone 752-2219 Business Telephone 752-3100

(B)

The balance of cash and any other sum of money on hand at the beginning of the period covered by this financial statement is \$ 10,761.25

The balance of cash and any other sum of money on hand at the end of the period covered by this financial statement is \$ 342.81

(C)

I hereby certify that the following is a true, complete, and itemized statement of all monies and other tangible things of value contributed or advanced by anyone, together with the full names of all such persons, firms, associations or committees who have made advances or contributions, provided that any contribution totaling more than fifty dollars (\$50.00) by any one contributor is by money order or by check.

## CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
11-1-76	Mike Hill	\$ 50.00			\$
11-1-76	Claude Ellis	50.00			
11-1-76	Swanzy Evans	50.00			
11-1-76	Paul White	50.00			
11-1-76	David White	50.00			

Any additional pages needed for other contributions of \$250 or less must include all of the above requested information.

TOTAL \$ 250.00

(Residence, Mailing Address, Business and Occupation must be listed)

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
	Mrs. Amos Doss	Box 77 Wilkinson, W. Va.	Grocery	\$1,000.00
	Joe Dingess	Box 987 Chapmanville, W.Va.	Contractor	1,500.00
	Donald D. Lambert	Kistler, West Va.	Foremar.	300.00
	Logan County Democratic Executive Committee	Logan, W.Va.		500.00
TOTAL				\$3,300.00

Any additional pages needed for other contributions exceeding \$250 must include all of the above requested information.

(D)

I further certify that the following is a true, complete, and itemized statement of every FUND RAISING EVENT held during the period covered by this financial statement. A FUND RAISING EVENT means any event such as a dinner, reception, testimonial, cocktail party, auction or similar affair through which contributions are solicited or received by such means as purchase of a ticket, payment of an attendance fee or through purchase of goods and services.

#### FUND RAISING EVENTS

Date of Event	October 28, 1976	Date of Event	
Type of Event	Hoot Owl Buffett	Type of Event	
Address of Place Held	Henlawson, West Va.	Address of Place Held	
Name of Place Held	Chief Logan State Park Restaurant	Name of Place Held	
Total Expenditures	\$ 2,169.94	Total Expenditures	\$
Net Receipts	\$ 19,350.00	Net Receipts	\$

Date of Event		Date of Event	
Type of Event		Type of Event	
Address of Place Held		Address of Place Held	
Name of Place Held		Name of Place Held	
Total Expenditures	\$	Total Expenditures	\$
Net Receipts	\$	Net Receipts	\$

Any additional pages needed for Fund Raising Events must include all of the above requested information.

# FUND RAISING EVENT

## CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
10-29-76	D. R. Winters	\$100.00			\$
10-29-76	Denver Mathis	100.00			
10-29-76	Leonard Ware	100.00			
10-29-76	Sammy Dalton	100.00			
10-29-76	Patricia Richmond	100.00			
10-29-76	Doris J. Hall	100.00			
10-29-76	Deanna Lynn Bryant	200.00			
10-29-76	Howard Dalton	200.00			
10-29-76	Phillip R. Cadd	100.00			
10-29-76	Opal Williamson	100.00			
10-29-76	Opal Combs	100.00			

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL \$ 1,300.00

# FUND RAISING EVENT

## CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EXCEED \$250 (Residence, Mailing Address, Business and Occupation must be listed)

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
10-29-76	James A. Trent	Box 145 Wilkinson, W.Va.	Machinist	\$ 1,000.00
10-29-76	George Albright, Jr.	Box 776 Logan, West Va.	Manager	400.00
10-29-76	Woodrow Lowe	613 Stratton Street Logan, West Va.	Circuit Clerk	700.00
10-29-76	J. Thomas Godby	427 Circle Drive Logan, West Va.	Assessor	400.00
10-29-76	Ervin S. Queen	West Logan, W.Va.	Self-employed	1,000.00
10-29-76	Enos Ramey	Box 37 Switzer, W.Va.	Grocery	500.00
10-29-76	Ralph Grimmett	Kistler, W.Va.	Self-employed	800.00
10-29-76	James N. Grubb	313 West Avis Avenue Man, W.Va.	Attorney	700.00
10-29-76	Andy Sos	Box 11 McConnell, W.Va.	service station operator	600.00

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL \$ 6,100.00

(E)

I further certify that all contributions received during the period covered by this financial statement have been reported above in Section C or Section D or both, and that the total amount of all such contributions is \$ 22,900.00

I further certify that the following is a true, complete, and itemized statement showing the date, amount and purpose of each expenditure made or liability incurred, together with the full name, residence and mailing address of each person, firm, association, or committee to whom each expenditure was made or liability incurred, and the total amount of such expenditures made and liabilities incurred during the period covered by this statement.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
10-15-76	Logan Banner	Logan, West Virginia	1,170.00
10-28-76	Logan News Printers	Logan, West Virginia	18.75
10-29-76	Park Restaurant	Logan, West Virginia	1,733.75
11-1-76	Logan Bank & Trust	Logan, W. Va. - 18,827.00 250.00 cash	19,077.00 *
	*TO DISTRICT COORDINATORS to distribute to precinct captains for the purposes set forth in Chapter 3, Article 8, Section 9, of the Code of West Virginia.		
	DISTRIBUTED TO	AMOUNT	
	Ralph Grimmett	3,750.00	
	Ralph Grimmett	1,100.00	
	Claude Ellis & Swansey Evans	5,100.00	
	Michall H. Hill & Vernon Dingess	4,150.00	
	Harold Hale	3,600.00	
	Claude Ellis	1,377.00	
		\$19,077.00	
11-8-76	Logan Coca-Cola Bot. Co.	Logan, West Va.	24.00
11-8-76	Logan News Printers	Logan, West Va.	300.00
11-29-76	Logan News Printers	Logan, West Va.	97.50
11-29-76	Jean Queen	West Logan, West Va.	136.19
Any additional pages needed for other expenditures must include all of the above requested information.			
TOTAL			\$ 22,557.19

(G)

I further certify that this statement lists all financial transactions, as reported above in Sections C, D, and F, for the period beginning on the 28th day of October, 19 76, and ending on the 1st day of December, 19 76.

(H)

I further certify that the total expenditure for the nomination, election or defeat of my candidacy (or any person or organization advocating or opposing the nomination, election or defeat of any candidate), or the passage or defeat of any issue, thing or item to be voted upon, in whose behalf an expenditure was made

or a contribution was given for the Election is \$ 22,557.19

This total includes all expenditures made as of the date of this statement, including all expenditures previously reported in other statements.)

### OATH OR AFFIRMATION

State of West Virginia

County of Logan, ss.

Thomas A. Tomblin, being duly sworn, deposes and says that the foregoing is a true and correct statement, to the best of his knowledge and belief, of all financial transactions occurring within the period covered by this statement.

*Thomas A. Tomblin*  
Signature of Candidate, Agent, or Treasurer

Subscribed and sworn to before me this 2nd day of December, 19 76

*Bertie Lee Murphy*  
Notary Public

My Commission expires on the 5th day of April, 19 78



# Statement of Receipts and Expenditures for Candidates, Agents, Treasurers or Committees

This statement is required to be filed according to the provisions of West Virginia Code §3-8-5 within 20 days after the date of the Election with the Secretary of State, Charleston, West Virginia, for all offices to be filled or issues to be voted upon by the voters of a political division greater than a county. For all offices to be filled or issues to be voted upon by the voters of a county or district therein, file this statement with the County Clerk. For all offices to be filled or issues to be voted upon by the voters of a city, file this statement with the City Clerk or Recorder. This statement has been prepared by James R. McCartney, Secretary of State of West Virginia, pursuant to the provisions of West Virginia Code §3-8-6.

(A)

Full Name of Candidate, Agent, Treasurer or Committee Thomas A. Tomblin  
(First) (Middle Initial) (Last)

Candidate for; or Agent, Treasurer or Committee in support of the following candidate or cause 1976 Logan County Democratic Campaign Committee  
(Office sought; or candidate or cause supported)  
Logan County  
(District or Circuit if any)

Party Affiliation (if any) Democratic

Residence Justice Addition Box 813  
(Number) (Street) (Street Address or Box Number)

Logan, West Virginia 25601 Logan, West Virginia 25601  
(Town or City) (Zip) (Town or City) (Zip)

Residence Telephone 752-2219 Business Telephone 752-3100

(B)

The balance of cash and any other sum of money on hand at the beginning of the period covered by this financial statement is \$ 10,761.25  
The balance of cash and any other sum of money on hand at the end of the period covered by this financial statement is \$ 342.81

(C)

I hereby certify that the following is a true, complete, and itemized statement of all monies and other tangible things of value contributed or advanced by anyone, together with the full names of all such persons, firms, associations or committees who have made advances or contributions, provided that any contribution totaling more than fifty dollars (\$50.00) by any one contributor is by money order or by check.

## CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
11-1-76	Mike Hill	\$ 50.00			\$
11-1-76	Claude Ellis	50.00			
11-1-76	Swanzy Evans	50.00			
11-1-76	Paul White	50.00			
11-1-76	David White	50.00			

Any additional pages needed for other contributions of \$250 or less must include all of the above requested information.

TOTAL \$ 250.00

(Residence, Mailing Address, Business and Occupation must be listed)

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
	Mrs. Amos Doss	Box 77 Wilkinson, W. Va.	Grocery	\$1,000.00
	Joe Dingress	Box 987 Chapmanville, W.Va.	Contractor	1,500.00
	Donald D. Lambert	Kistler, West Va.	Foreman	300.00
	Logan County Democratic Executive Committee	Logan, W.Va.		500.00
TOTAL				\$3,300.00

Any additional pages needed for other contributions exceeding \$250 must include all of the above requested information.

(D)

I further certify that the following is a true, complete, and itemized statement of every FUND RAISING EVENT held during the period covered by this financial statement. A FUND RAISING EVENT means any event such as a dinner, reception, testimonial, cocktail party, auction or similar affair through which contributions are solicited or received by such means as purchase of a ticket, payment of an attendance fee or through purchase of goods and services.

#### FUND RAISING EVENTS

Date of Event	October 28, 1976	Date of Event	
Type of Event	Hoot Owl Buffett	Type of Event	
Address of Place Held	Henlawson, West Va.	Address of Place Held	
Name of Place Held	Chief Logan State Park Restaurant	Name of Place Held	
Total Expenditures	\$ 2,169.94	Total Expenditures	\$
Net Receipts	\$ 19,350.00	Net Receipts	\$

Date of Event		Date of Event	
Type of Event		Type of Event	
Address of Place Held		Address of Place Held	
Name of Place Held		Name of Place Held	
Total Expenditures	\$	Total Expenditures	\$
Net Receipts	\$	Net Receipts	\$

Any additional pages needed for Fund Raising Events must include all of the above requested information.



# CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	
10-29-76	D. R. Winters	\$100.00			\$
10-29-76	Denver Mathis	100.00			
10-29-76	Leonard Ware	100.00			
10-29-76	Sammy Dalton	100.00			
10-29-76	Patricia Richmond	100.00			
10-29-76	Doris J. Hall	100.00			
10-29-76	Deanna Lynn Bryant	200.00			
10-29-76	Howard Dalton	200.00			
10-29-76	Phillip R. Cadd	100.00			
10-29-76	Opal Williamson	100.00			
10-29-76	Opal Combs	100.00			

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL \$ 1,300.00

## FUND RAISING EVENT

### CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EXCEED \$250 (Residence, Mailing Address, Business and Occupation must be listed)

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
10-29-76	James A. Trent	Box 145 Wilkinson, W.Va.	Machinist	\$ 1,000.00
10-29-76	George Albright, Jr.	Box 776 Logan, West Va.	Manager	400.00
10-29-76	Woodrow Lowe	613 Stratton Street Logan, West Va.	Circuit Clerk	700.00
10-29-76	J. Thomas Godby	427 Circle Drive Logan, West Va.	Assessor	400.00
10-29-76	Ervin S. Queen	West Logan, W.Va.	Self-employed	1,000.00
10-29-76	Enos Ramey	Box 37 Switzer, W.Va.	Grocery	500.00
10-29-76	Ralph Grimmett	Kistler, W.Va.	Self-employed	800.00
10-29-76	James N. Grubb	313 West Avis Avenue Man, W.Va.	Attorney	700.00
10-29-76	Andy Sos	Box 11 McConnell, W.Va.	service station operator	600.00

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL \$ 6,100.00

(E)

I further certify that all contributions received during the period covered by this financial statement have been reported above in Section C or Section D or both, and that the total amount of all such contributions

is \$ 22,900.00

November 30,

MEMO TO THE FILE


During the course of the audit of the West Virginia State Democratic Telethon Committee, the auditors performed a cursory review of disclosure reports filed by candidates for Federal office from the State of West Virginia to determine whether all transfers had been disclosed in accordance with 2 U.S.C. 434(b)(4).

As a result of the trace, it was determined that the Keep Nick Rahall In Congress Committee made the following transfers to unregistered political groups within West Virginia for apparent Get Out The Vote Activities:

Committee For a Better Logan County	5-02-78	\$5,000.00
✓ Independent Democrats Committee (Logan County)	5-02-78	3,000.00
- Independent Democrats Committee (Logan County)	5-05-78	2,000.00
Mingo County Democratic Executive Committee	5-03-78	2,500.00
Mingo County Democratic Executive Committee	5-05-78	1,500.00

Since this activity totally involves committees not within the scope of the West Virginia State Democratic Telethon Committee audit, the activity was mentioned to the Reports Analysts responsible for reviewing reports of West Virginia Committees to make them aware of the situation in order that they may deem it necessary to pursue the recipient committees as unregistered committees.

cc: ~~Tom~~ Haselhorst,  
Assistant Staff Director  
for Reports Analysis



I hereby certify that the following is a true, complete, and itemized statement showing the date, amount and purpose of each expenditure made or liability incurred, together with the full name, residence and mailing address of each person, firm, association, or committee to whom each expenditure was made or liability incurred, and the total amount of such expenditures made and liabilities incurred during the period covered by this statement.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
10-15-76	Logan Banner	Logan, West Virginia	1,170.00
10-22-76	Logan News Printers	Logan, West Virginia	\$ 18.75
10-29-76	Park Restaurant	Logan, West Virginia	1,733.75
11-1-76	Logan Bank & Trust	Logan, W. Va. - 18,827.00	250.00 cash
			19,077.00 *
	*TO DISTRICT COORDINATORS to distribute to precinct captains for the purposes set forth in Chapter 3, Article 8, Section 9, of the Code of West Virginia.		
	DISTRIBUTED TO	AMOUNT	
	Ralph Grimmett	3,750.00	
	Ralph Grimmett	1,100.00	
	Claude Ellis & Swansey Evans	5,100.00	
	Michall H. Hill & Vernon Dingess	4,150.00	
	Harold Hale	3,600.00	
	Claude Ellis	1,377.00	
		\$19,077.00	
11-8-76	Logan Coca-Cola Bot. Co.	Logan, West Va.	24.00
11-8-76	Logan News Printers	Logan, West Va.	300.00
11-29-76	Logan News Printers	Logan, West Va.	97.50
11-29-76	Jean Queen	West Logan, West Va.	136.19
Any additional pages needed for other expenditures must include all of the above requested information.			
TOTAL			\$ 22,557.19

(G)

I further certify that this statement lists all financial transactions, as reported above in Sections C, D, and F, for the period beginning on the 28th day of October, 19 76, and ending on the 1st day of December, 19 76.

(H)

I further certify that the total expenditure for the nomination, election or defeat of my candidacy (or any person or organization advocating or opposing the nomination, election or defeat of any candidate), or the passage or defeat of any issue, thing or item to be voted upon, in whose behalf an expenditure was made

or a contribution was given for the Election is \$ 22,557.19.  
(This total includes all expenditures made as of the date of this statement, including all expenditures previously reported in other statements.)

### OATH OR AFFIRMATION

State of West Virginia

County of Logan, ss.

Thomas A. Tomblin, being duly sworn, deposes and says that the foregoing is a true and correct statement, to the best of his knowledge and belief, of all financial transactions occurring within the period covered by this statement.

Signature of Candidate, Agent, or Treasurer

Subscribed and sworn to before me this 2nd day of December, 19 76

Notary Public

My Commission expires on the 5th day of April, 19 78.

REQUEST FOR ADDITIONAL INFORMATION - PAGE TWO  
KEEP NICK RAHALL IN CONGRESS COMMITTEE  
30 DAY POST PRIMARY REPORT

On Schedule B you list \$14,000.00 in expenditures made to unregistered committees for election day expenses. Please provide further clarification as to the nature of those expenses.

On Schedule C your report discloses loans from Nick J. Rahall. Please clarify whether the amount loaned to the committee was from the candidate's personal funds, or a note obtained from a bank through the candidate. If the loans are from a bank, please provide the name and address of the lending institution and the interest rates and terms of the loans.

799307652



# ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In Kind,  
Loans, Loan Repayments and Refunds Made)  
Supporting Lines 20a, 21a, and 22a, 22b, and 27c  
of FEC FORM 3

Page 1 of 1  
Line Number 22b

(Use Separate Schedules for  
each numbered line)

Name of Candidate or Committee in Full

Keep Nick Rahall In Congress Committee

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Committee For a Better Logan County 527 Stratton St. Logan, W. Va.	For Precinct Organizations and Election Day Expense Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/2/78	5,000.00
Independent Democrats Committee P. O. Box 810 Logan, W. Va.	For Precinct Organ. & Election Day Expense Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/2/78 5/5/78	3,000.00 2,000.00
Mingo County Democrat Exec. Rastie Runyon Comm. Williamson, W. Va.	For Precinct Organization & Election Day Expense Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/3/78 5/5/78	2,500.00 1,500.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
SUBTOTAL of expenditures (this page optional)			\$ 14,000.
TOTAL (sum of all pages) (optional)			\$ 14,000.



# Congressman Nick Rahall

REGULAR MAIL 3/79

February 14, 1979

16 PM 3:09

The Honorable Edmund L. Henshaw, Jr.  
Clerk of the House  
Room 1036 Longworth Building  
Washington, D. C.

Dear Mr. Henshaw:

664-105  
*[Handwritten signature]*

058319

My Campaign Treasurer, Anthony P. Gonzalez, has received several requests from the Federal Elections Commission to make certain clarifications to reports filed by both of my campaign committees - the Keep Nick Rahall In Congress Committee (#069965) and the Nick J. Rahall For Congress Committee (#05319). With your permission I will answer those requests in this letter as Mr. Gonzalez is not available at this time, and when he returns he will forward a letter to you verifying the information contained in this letter. 058319

1) On August 25, 1978 the Commission requested clarification to the 10 day Pre-Primary Report for the Keep Nick Rahall In Congress Committee regarding a contribution listed as being received from the firm of Thornhill, Kennedy, and Vaughan on April 6, 1978 in the amount of \$500.00. Please correct the record to reflect:

- Warren A. Thornhill, III of 800 Woodlawn Avenue, Beckley, West Virginia, who is an attorney located in the Raleigh County National Bank Building in Beckley, West Virginia contributed \$166.67 to my Campaign Committee on April 6, 1978. His aggregate contributions to the date of the report were \$166.67.

- David T. Kennedy of 102 Mollohan Drive, Beckley, West Virginia who is an attorney located in the Raleigh County National Bank Building in Beckley, West Virginia contributed \$166.66 to my Campaign Committee on April 6, 1978 and that his aggregate contributions to the date of the report were \$166.66.

- James F. Vaughan, Jr. of 109 College Avenue, Beckley, West Virginia who is also an attorney with offices in the Raleigh County National Bank Building in Beckley, West Virginia contributed \$166.66 to the Committee on April 6, 1978, and his aggregate contributions to the date of the report were \$166.66

P.O. Box 64, Beckley, West Virginia 25801

A copy of our report is filed with and available for purchase from the Federal Election Commission, Washington, D.C. 20463.



2) On November 13, 1978 the Commission requested additional information from the Nick Joe Rahall For Congress Committee concerning their October 10, 1978 Report which showed an expenditure to the U.S. Postmaster as a "debt". The word "debt" which appears below the typed explanation of the expenditure was a typographical error on the part of the typist. The notation was an "in-house" note marking that the mailings were for contributions to retire the "debt". The Committee was not indebted to the U.S. Postmaster. Please correct the record to have the word "debt" deleted as it is irrelevant to the report.

3) On December 19, 1978 the Commission requested clarification to the Keep Nick Rahall In Congress Committee 30 Day Post Primary Report in two instances:

a) Further clarification as to the nature of the expenses of the Committees to which the Committee paid \$14,000 for "election day expense".

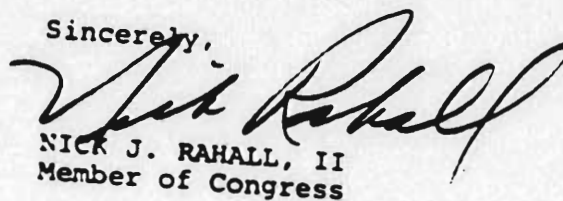
The monies "transferred" to the three political committees were to help defray the expenses the Committee had in the three counties for such things as signs, sample ballots, expenses for vehicles taking voters to the polls, and a 'get out the vote' type operation. It would be impossible for the Committee - the donor, to list specifically in each instance as to how the money donated was spent as the contributions were made to help defray the cost for the committee within the county. Further information on how the money was exactly spent will have to come from the committees.

b) The Commission requested further information on the personal loans the Candidate made to the Committee. Attached are new Schedule "C" forms which reflect the information requested.

I trust the above and the attached satisfies the requests made by the Commission and we will be happy to furnish additional information if further clarification is necessary.

With warm regard, I am

Sincerely,

  
NICK J. RAHALL, II  
Member of Congress

NJR/jmk  
Enclosures

Memo to the File:

Allocation/West Virginia Committees

11/7/79/Greevy

Meeting with Ken Gross

and: Bobby Werfel

Fran Hagan

Rick Halter

Dug Greevy

The above met this day to discuss the proposal which Audit and RAD jointly prepared and submitted to OGC regarding Allocation of Expenses by Party Committees/7/13/79.

Gross stated that Claire Lindsay had written a proposal in response to the Audit/RAD proposal prior to her departure. We discussed the need to have some specific guidelines for committees to follow if in fact we determine that action should be pursued against them.

However, we noted that the Commission thus far has not provided any certain guidance, particularly in the case of GOTV/ voter registration expenses made by committees which do not have segregated accounts.

Gross acknowledged our dilemma. In particular, we stated that there are several referrals received from Audit by RAD regarding WV committees which expended in excess of \$1,000 for GOTV. Based upon various formulas, the committees may or may not have to register with FEC. We stated that we did not think it right to send letters to the committees unless we could be more specific as to why they qualify as political committees.

Gross stated that he would forward to us a copy of the Lindsay proposal, and that he would review the amounts in question for the WV committees.

We are to respond to the Lindsay proposal as soon as possible so that a final decision can be made on this matter.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Treasurer  
Mingo County Democratic  
Executive Committee  
c/o Rastie Runyon  
Williamson, West Virginia

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. It has come to our attention that your organization may have made expenditures to influence Federal elections during the calendar year 1978. In particular, your committee appears to have received \$4,000 from the Keep Nick Rahall in Congress Committee. These funds may have been used for get-out-the-vote activities. A copy of that portion of the report is attached.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" for 1978, subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have questions, please contact David Greevy, in our Reports Analysis Division at (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Thomas J. Haselhorst  
Assistant Staff Director

Enclosure

REPORTS ANALYSIS REFERRAL SHEET

DATE March 28, 1980 ANALYST Dug Greevy *by 3/11*  
 TO: Office of General Counsel TEAM CHIEF Bobby Werfel  
 THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW CB  
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *[Signature]*

CANDIDATE/COMMITTEE: Independent Democratic Committee  
 TREASURER:  
 ADDRESS: Post Office Box 310  
 Logan, West Virginia  
 AFFILIATE(S):

ALLEGATION(S): Unregistered Political Committee CITE: 2 U.S.C. 433 & 434 ATTACHMENT(S) A & B

DATE INITIATED: 2/12/79

MANNER IN WHICH REVIEW WAS INITIATED: Referral from Audit Division  
☐ Normal Review ☐ Other: ATTACHMENT A  
☐ Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM \_\_\_\_\_ TO \_\_\_\_\_

TOTAL RECEIPTS \$ \_\_\_\_\_ TOTAL EXPENDITURES \$ \_\_\_\_\_

CASH ON HAND \$ \_\_\_\_\_ DEBTS \$ \_\_\_\_\_

HISTORY:

RESULTS OF REVIEW: ATTACHMENT

None

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT

None

REASON(S) FOR REFERRAL: ATTACHMENT

See Cover Memo: Haselhorst to OGC

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT

None

OTHER RELEVANT INFORMATION: ATTACHMENT

Request for Additional Information, 12/18/78, sent to transferring committee C  
 Response Received to RFAI, 2/14/79 D  
 Memo to the File: Greevy, 11/7/79 E  
 Letter Prepared to Send to Independent Democrats Committee F

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

None

**SCHEDULE B**

**REVISED**

**January, 1978**

**Federal Election Commission**

**1325 K Street, N.W.**

**Washington, D.C. 20463**

**ITEMIZED EXPENDITURES**

(Check on Transfer Out, Contributions In-Lieu,  
Loans, Loan Repayments and Refunds Also)  
Supporting Lines 20a, 21a, and 22a, 22b, and 22c  
of FEC FORM 3

Line Number \_\_\_\_\_

(Use Separate Schedules for  
each numbered line)

Name of Candidate or Committee in Full

**Keco Nick Rahall In Congress Committee**

Full Name, Mailing Address and ZIP Code	Particulars of Expenditures	Date (month, day, year)	Amount of each expenditure this period
<b>Committee For a Better Logan County</b> 527 Stratton St. Logan, W. Va.	<b>For Precinct Organizations and Election Day Expense</b> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<b>5/2/78</b>	<b>5,000.00</b>
<b>Independent Democrats Committee</b> P. O. Box 810 Logan, W. Va.	<b>For Precinct Comm. &amp; Election Day Expense</b> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<b>5/2/78</b> <b>5/5/78</b>	<b>3,000.00</b> <b>2,000.00</b>
<b>Mingo County Democrat Exec. Committee</b> 70001e Runyon Williamson, W. Va.	<b>For Precinct Organization &amp; Election Day Expense</b> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<b>5/2/78</b> <b>5/5/78</b>	<b>2,500.00</b> <b>1,500.00</b>
Full Name, Mailing Address and ZIP Code	Particulars of Expenditures Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditures Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditures Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditures Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditures Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditures Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period

73011375000





FEDERAL ELECTION COMMISSION

1155 A STREET N.W.  
WASHINGTON, D.C. 20461

18 DEC 1977

Mr. Anthony P. Gonzalez, Treasurer  
KEEP NICK RAHALL IN CONGRESS COMMITTEE  
P.O. Box 64  
Beckley, West Virginia 25801

Dear Mr. Gonzalez:

This letter is prompted by our interest in assisting House candidates and committees who wish to comply with the Federal Election Campaign Act.

During review of the 30 Day Post Primary Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

The Federal Election Commission, in connection with its statutory responsibility to enforce the Act, reviews all Federal campaign disclosure documents, including those filed initially with the Clerk of the House. The Office of the Clerk, as an informational service, is notifying filers of the errors and omissions found in their preliminary review of documents filed with the Clerk. This letter and attached documentation constitute official notification by the Commission of errors and omissions found, and require a written response.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Clerk of the House, Office of Records and Registration, 1036 Longworth HOB, Washington, D.C. 20515, with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Beth Holland in our Reports Analysis Division on the toll free number (800) 424-9530. Our local number is (202) 523-4172.

Sincerely,

*Orlando B. Potter*

Orlando B. Potter  
Staff Director

Attachment  
FEC Form 12

FEDERAL ELECTION COMMISSION  
1325 K Street, N.W.  
Washington, D.C. 20463

BP/4

TO: KEEP NICK RAIWALL IN CONGRESS COMMITTEE W/04

DATE: 18 DEC 1978

I.D. NO.: 00081356

REQUEST FOR ADDITIONAL INFORMATION FOR THE 30 Day Post Primary REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 4/25/78 THROUGH 5/29/78, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

- ☐ Coverage Dates: ☐ omitted or ☐ incorrect
- ☐ Summary Page Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☐ Detailed Summary (Page 2) Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☐ Schedule Totals: ☐ disagree with Detailed Summary (Page 2) or ☐ omitted
- ☐ Date(s): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Full Name(s)/Mailing Address(es): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Occupation/Principal Place(s) of Business: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Election Designation: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Aggregate Year-to-Date Totals: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Nature or Purpose of Expenditure: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Nature or Purpose of Receipt: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Inadequate Description of: ☐ proceeds ☐ dates ☐ events ☐ location of Schedule
- ☐ Signature: ☐ omitted ☐ inadequate
- 11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report*

☒ Other: Please see Page Two

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1026 Longworth House Office Building, Washington, D.C. 20515.

BP/4

**REQUEST FOR ADDITIONAL INFORMATION - PAGE TWO**  
**KEEP NICK RAHALL IN CONGRESS COMMITTEE**  
**30 DAY POST PRIMARY REPORT**

On Schedule B you list \$14,000.00 in expenditures made to unregistered committees for election day expenses. Please provide further clarification as to the nature of those expenses.

On Schedule C your report discloses loans from Nick J. Rahall. Please clarify whether the amount loaned to the committee was from the candidate's personal funds, or a note obtained from a bank through the candidate. If the loans are from a bank, please provide the name and address of the lending institution and the interest rates and terms of the loans.

A9-2



## FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

February 12, 1979

MEMORANDUM

TO: TOM HASELHORST

FROM: *RPC* BOB COSTA/JOE STOLTZ *JS*

SUBJECT: UNREGISTERED POLITICAL ORGANIZATION

During a recent audit of the West Virginia State Democratic Telethon Committee, the Audit staff was presented with a copy of a State disclosure report of the 1976 Logan County Democratic Campaign Committee ("the County Committee") (Attachment #1), an unregistered political organization.

Based upon a review of the report as outlined below, it is the opinion of the Audit staff that the County Committee has engaged in activity which would require it to register and report in accordance with Sections 433 and 434 of Title 2 of the United States Code.

Registration and Reporting by a Political Committee

Section 433(a) of Title 2 of the United States Code requires each political committee which anticipates receiving contributions or making expenditures during the calendar year in an aggregate amount or value exceeding \$1,000 to file with the Commission a statement of organization within 10 days following the date of the anticipation.

Section 434(a) of Title 2 of the United States Code requires the treasurer of a political committee to file with the Commission reports of receipts and expenditures on prescribed or approved forms.

Our review of the State report revealed a fundraising event held October 28, 1976 which netted proceeds of \$19,350.00. The proceeds of the event were disbursed by the County Committee to district coordinators for distribution to precinct captains for the purposes set forth in Chapter 3, Article 8, Section 9 of the Code of West Virginia. According to a representative of the West Virginia Attorney General's office, the section of the code



cited above deals with expenditures of a political committee, a portion of which deals specifically with election day expenses.

It is the opinion of the Audit staff, based upon the information presented, that the distribution mentioned above was made for Get-Out-The Vote activities. As such, according to Advisory Opinion 1978-10, the County Committee would normally be required to allocate the activity between Federal and non-Federal elections on a reasonable basis. It appears reasonable that the portion allocated for Federal elections would exceed \$1,000. As such, the County Committee would normally be required to register and report in accordance with Sections 433 and 434. Therefore, the matter is referred to your Division for consideration along with the matter referred on November 30, 1978 (Attachment #2).

Any questions concerning the matter should be communicated to Ray Lisi on extension 3-4060 or Charlie Hanshaw on extension 3-4155.

Attachments as stated

# AFTER THE ELECTION

Attachment #1



## Statement of Receipts and Expenditures for Candidates, Agents, Treasurers or Committees

This statement is required to be filed according to the provisions of West Virginia Code §3-8-5 within 30 days after the date of the Election with the Secretary of State, Charleston, West Virginia, for all offices to be filled or issues to be voted upon by the voters of a political division greater than a county. For all offices to be filled or issues to be voted upon by the voters of a county or district therein, file this statement with the County Clerk. For all offices to be filled or issues to be voted upon by the voters of a city, file this statement with the City Clerk or Recorder. This statement has been prepared by James R. McCartney, Secretary of State of West Virginia, pursuant to the provisions of West Virginia Code §3-8-6.

(A)

Full Name of Candidate, Agent, Treasurer or Committee Thomas A. Tomblin  
(First) (Middle Initial) (Last)

Candidate for; or Agent, Treasurer or Committee in support of the following candidate or cause 1976 Logan County Democratic Campaign Committee  
(Office sought, or candidate or cause supported)

Logan County  
(District or Circuit if any)

Party Affiliation (if any) Democratic

Residence Justice Addition  
(Number) (Street)

Mailing Address Box 813  
(Street Address or Box Number)

Logan, West Virginia 25601  
(Town or City) (Zip)

Logan, West Virginia 25601  
(Town or City) (Zip)

Residence Telephone 752-2219

Business Telephone 752-3100

(B)

The balance of cash and any other sum of money on hand at the beginning of the period covered by this financial statement is \$ 10,761.25

The balance of cash and any other sum of money on hand at the end of the period covered by this financial statement is \$ 342.81

(C)

I hereby certify that the following is a true, complete, and itemized statement of all monies and other tangible things of value contributed or advanced by anyone, together with the full names of all such persons, firms, associations or committees who have made advances or contributions, provided that any contribution totaling more than fifty dollars (\$50.00) by any one contributor is by money order or by check.

### CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
11-1-76	Mike Hill	\$ 50.00			\$
11-1-76	Claude Ellis	50.00			
11-1-76	Swanzy Evans	50.00			
11-1-76	Paul White	50.00			
11-1-76	David White	50.00			

Any additional pages needed for other contributions of \$250 or less must include all of the above requested information.

TOTAL \$ 250.00



(Residence, Mailing Address, Business and Occupation must be listed)

DATE	NAME OF CONTRIBUTOR (First, M. L. Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
	Mrs. Amos Doss	Box 77 Wilkinson, W. Va.	Grocery	\$1,000.00
	Joe Dingess	Box 987 Chapmanville, W.Va.	Contractor	1,500.00
	Donald D. Lambert	Kistler, West Va.	Foremar.	300.00
	Logan County Democratic Executive Committee	Logan, W.Va.		500.00
TOTAL				\$3,300.00

Any additional pages needed for other contributions exceeding \$250 must include all of the above requested information.

(D)

I further certify that the following is a true, complete, and itemized statement of every FUND RAISING EVENT held during the period covered by this financial statement. A FUND RAISING EVENT means any event such as a dinner, reception, testimonial, cocktail party, auction or similar affair through which contributions are solicited or received by such means as purchase of a ticket, payment of an attendance fee or through purchase of goods and services.

#### FUND RAISING EVENTS

Date of Event	October 28, 1976	Date of Event	
Type of Event	Hoot Owl Buffett	Type of Event	
Address of Place Held	Henlawson, West Va.	Address of Place Held	
Name of Place Held	Chief Logan State Park Restaurant	Name of Place Held	
Total Expenditures	\$ 2,169.94	Total Expenditures	\$
Net Receipts	\$ 19,350.00	Net Receipts	\$

Date of Event		Date of Event	
Type of Event		Type of Event	
Address of Place Held		Address of Place Held	
Name of Place Held		Name of Place Held	
Total Expenditures	\$	Total Expenditures	\$
Net Receipts	\$	Net Receipts	\$

Any additional pages needed for Fund Raising Events must include all of the above requested information.

# FUND RAISING EVENT

## CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
10-29-76	D. R. Winters	\$100.00			\$
10-29-76	Denver Mathis	100.00			
10-29-76	Leonard Ware	100.00			
10-29-76	Sammy Dalton	100.00			
10-29-76	Patricia Richmond	100.00			
10-29-76	Doris J. Hall	100.00			
10-29-76	Deanna Lynn Bryant	200.00			
10-29-76	Howard Dalton	200.00			
10-29-76	Phillip R. Cadd	100.00			
10-29-76	Opal Williamson	100.00			
10-29-76	Opal Combs	100.00			

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL \$ 1,300.00

# FUND RAISING EVENT

## CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EXCEED \$250 (Residence, Mailing Address, Business and Occupation must be listed)

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
10-29-76	James A. Trent	Box 145 Wilkinson, W.Va.	Machinist	\$ 1,000.00
10-29-76	George Albright, Jr.	Box 776 Logan, West Va.	Manager	400.00
10-29-76	Woodrow Lowe	613 Stratton Street Logan, West Va.	Circuit Clerk	700.00
10-29-76	J. Thomas Godby	427 Circle Drive Logan, West Va.	Assessor	400.00
10-29-76	Ervin S. Queen	West Logan, W.Va.	Self-employed	1,000.00
10-29-76	Enos Ramey	Box 37 Switzer, W.Va.	Grocery	500.00
10-29-76	Ralph Grimmett	Kistler, W.Va.	Self-employed	800.00
10-29-76	James N. Grubb	313 West Avis Avenue Man, W.Va.	Attorney	700.00
10-29-76	Andy Sos	Box 11 McConnell, W.Va.	service station operator	600.00

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL \$ 6,100.00

(E)

I further certify that all contributions received during the period covered by this financial statement have been reported above in Section C or Section D or both, and that the total amount of all such contributions is \$ 22,900.00

I further certify that the following is a true, complete, and itemized statement showing the date, amount and purpose of each expenditure made or liability incurred, together with the full name, residence and mailing address of each person, firm, association, or committee to whom each expenditure was made or liability incurred, and the total amount of such expenditures made and liabilities incurred during the period covered by this statement.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
10-15-76	Logan Banner	Logan, West Virginia	1,170.00
10-28-76	Logan News Printers	Logan, West Virginia	\$ 18.75
10-29-76	Park Restaurant	Logan, West Virginia	1,733.75
11-1-76	Logan Bank & Trust	Logan, W. Va. - 18,827.00 250.00 cash	19,077.00 *
	*TO DISTRICT COORDINATORS to distribute to precinct captains for the purposes set forth in Chapter 3, Article 8, Section 9, of the Code of West Virginia.		
	DISTRIBUTED TO	AMOUNT	
	Ralph Grimmett	3,750.00	
	Ralph Grimmett	1,100.00	
	Claude Ellis & Swansey Evans	5,100.00	
	Michall H. Hill & Vernon Dingess	4,150.00	
	Harold Hale	3,600.00	
	Claude Ellis	1,377.00	
		\$19,077.00	
11-8-76	Logan Coca-Cola Bot. Co.	Logan, West Va.	24.00
11-8-76	Logan News Printers	Logan, West Va.	300.00
11-29-76	Logan News Printers	Logan, West Va.	97.50
11-29-76	Jean Queen	West Logan, West Va.	136.19
Any additional pages needed for other expenditures must include all of the above requested information.			
TOTAL			\$ 22,557.19

(G)

I further certify that this statement lists all financial transactions, as reported above in Sections C, D, and F, for the period beginning on the 28th day of October, 19 76, and ending on the 1st day of December, 19 76.

(H)

I further certify that the total expenditure for the nomination, election or defeat of my candidacy (or any person or organization advocating or opposing the nomination, election or defeat of any candidate), or the passage or defeat of any issue, thing or item to be voted upon, in whose behalf an expenditure was made

or a contribution was given for the Election is \$ 22,557.19

(This total includes all expenditures made as of the date of this statement, including all expenditures previously reported in other statements.)

### OATH OR AFFIRMATION

State of West Virginia

County of Logan, ss.

Thomas A. Tomblin, being duly sworn, deposes and says that the foregoing is a true and correct statement, to the best of his knowledge and belief, of all financial transactions occurring within the period covered by this statement.

Signature of Candidate, Agent, or Treasurer

Subscribed and sworn to before me this 2nd day of December, 19 76

Notary Public

My Commission expires on the 5th day of April, 19 78

Statement of Receipts and Expenditures for Candidates, Agents, Treasurers or Committees

This statement is required to be filed according to the provisions of West Virginia Code §3-8-5 within 30 days after the date of the Election with the Secretary of State, Charleston, West Virginia, for all offices to be filled or issues to be voted upon by the voters of a political division greater than a county. For all offices to be filled or issues to be voted upon by the voters of a county or district therein, file this statement with the County Clerk. For all offices to be filled or issues to be voted upon by the voters of a city, file this statement with the City Clerk or Recorder. This statement has been prepared by James R. McCartney, Secretary of State of West Virginia, pursuant to the provisions of West Virginia Code §3-8-6.

(A)

Full Name of Candidate, Agent, Treasurer or Committee Thomas A. Tomblin  
(First) (Middle Initial) (Last)

Candidate for; or Agent, Treasurer or Committee in support of the following candidate or cause 1976 Logan County Democratic Campaign Committee  
(Office sought; or candidate or cause supported)  
Logan County  
(District or Circuit if any)

Party Affiliation (if any) Democratic

Residence Justice Addition Mailing Address Box 813  
(Number) (Street) (Street Address or Box Number)

Logan, West Virginia 25601 Logan, West Virginia 25601  
(Town or City) (Zip) (Town or City) (Zip)

Residence Telephone 752-2219 Business Telephone 752-3100

(B)

The balance of cash and any other sum of money on hand at the beginning of the period covered by this financial statement is \$ 10,761.25  
The balance of cash and any other sum of money on hand at the end of the period covered by this financial statement is \$ 342.81

(C)

I hereby certify that the following is a true, complete, and itemized statement of all monies and other tangible things of value contributed or advanced by anyone, together with the full names of all such persons, firms, associations or committees who have made advances or contributions, provided that any contribution totaling more than fifty dollars (\$50.00) by any one contributor is by money order or by check.

CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT
11-1-76	Mike Hill	\$ 50.00			\$
11-1-76	Claude Ellis	50.00			
11-1-76	Swanzy Evans	50.00			
11-1-76	Paul White	50.00			
11-1-76	David White	50.00			

Any additional pages needed for other contributions of \$250 or less must include all of the above requested information. TOTAL \$ 250.00

(Residence, Mailing Address, Business and Occupation must be listed)

DATE	NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
	Mrs. Amos Doss	Box 77 Wilkinson, W. Va.	Grocery	\$1,000.00
	Joe Dingess	Box 987 Chapmanville, W.Va.	Contractor	1,500.00
	Donald D. Lambert	Kistler, West Va.	Foreman	300.00
	Logan County Democratic Executive Committee	Logan, W.Va.		500.00
TOTAL				\$3,300.00

Any additional pages needed for other contributions exceeding \$250 must include all of the above requested information.

(D)

I further certify that the following is a true, complete, and itemized statement of every FUND RAISING EVENT held during the period covered by this financial statement. A FUND RAISING EVENT means any event such as a dinner, reception, testimonial, cocktail party, auction or similar affair through which contributions are solicited or received by such means as purchase of a ticket, payment of an attendance fee or through purchase of goods and services.

#### FUND RAISING EVENTS

Date of Event	October 28, 1976	Date of Event	
Type of Event	Hoot Owl Buffett	Type of Event	
Address of Place Held	Henlawson, West Va.	Address of Place Held	
Name of Place Held	Chief Logan State Park Restaurant	Name of Place Held	
Total Expenditures	\$ 2,169.94	Total Expenditures	\$
Net Receipts	\$ 19,350.00	Net Receipts	\$

Date of Event		Date of Event	
Type of Event		Type of Event	
Address of Place Held		Address of Place Held	
Name of Place Held		Name of Place Held	
Total Expenditures	\$	Total Expenditures	\$
Net Receipts	\$	Net Receipts	\$

Any additional pages needed for Fund Raising Events must include all of the above requested information.



# CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EQUAL \$250 OR LESS

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	AMOUNT	DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	
10-29-76	D. R. Winters	\$100.00			\$
10-29-76	Denver Mathis	100.00			
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10-29-76	Sammy Dalton	100.00			
10-29-76	Patricia Richmond	100.00			
10-29-76	Doris J. Hall	100.00			
10-29-76	Deanna Lynn Bryant	200.00			
10-29-76	Howard Dalton	200.00			
10-29-76	Phillip R. Cadd	100.00			
10-29-76	Opal Williamson	100.00			
10-29-76	Opal Combs	100.00			

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL \$ 1,300.00

## FUND RAISING EVENT

### CONTRIBUTORS WHOSE AGGREGATE CONTRIBUTIONS EXCEED \$250 (Residence, Mailing Address, Business and Occupation must be listed)

DATE OF EVENT	NAME OF CONTRIBUTOR (First, M. I., Last)	RESIDENCE AND MAILING ADDRESS	BUSINESS AND OCCUPATION	AMOUNT
10-29-76	James A. Trent	Box 145 Wilkinson, W.Va.	Machinist	\$ 1,000.00
10-29-76	George Albright, Jr.	Box 776 Logan, West Va.	Manager	400.00
10-29-76	Woodrow Lowe	613 Stratton Street Logan, West Va.	Circuit Clerk	700.00
10-29-76	J. Thomas Godby	427 Circle Drive Logan, West Va.	Assessor	400.00
10-29-76	Ervin S. Queen	West Logan, W.Va.	Self-employed	1,000.00
10-29-76	Enos Ramey	Box 37 Switzer, W.Va.	Grocery	500.00
10-29-76	Ralph Grimmett	Kistler, W.Va.	Self-employed	800.00
10-29-76	James N. Grubb	313 West Avis Avenue Man, W.Va.	Attorney	700.00
10-29-76	Andy Sos	Box 11 McConnell, W.Va.	service station operator	600.00

Any additional pages needed for Fund Raising Events must include all of the above requested information.

TOTAL \$ 6,100.00

(E)

I further certify that all contributions received during the period covered by this financial statement have been reported above in Section C or Section D or both, and that the total amount of all such contributions

is \$ 22,900.00



November 30,

MEMO TO THE FILE


During the course of the audit of the West Virginia State Democratic Telethon Committee, the auditors performed a cursory review of disclosure reports filed by candidates for Federal office from the State of West Virginia to determine whether all transfers had been disclosed in accordance with 2 U.S.C. 434(b)(4).

As a result of the trace, it was determined that the Keep Nick Rahall In Congress Committee made the following transfers to unregistered political groups within West Virginia for apparent Get Out The Vote Activities:

Committee For a Better Logan County	5-02-78	\$5,000.00
✓ Independent Democrats Committee (Logan County)	5-02-78	3,000.00
- Independent Democrats Committee (Logan County)	5-05-78	2,000.00
Mingo County Democratic Executive Committee	5-03-78	2,500.00
Mingo County Democratic Executive Committee	5-05-78	1,500.00

Since this activity totally involves committees not within the scope of the West Virginia State Democratic Telethon Committee audit, the activity was mentioned to the Reports Analysts responsible for reviewing reports of West Virginia Committees to make them aware of the situation in order that they may deem it necessary to pursue the recipient committees as unregistered committees.

cc: ~~Tom~~ Haselhorst,  
Assistant Staff Director  
for Reports Analysis



I hereby certify that the following is a true, complete, and itemized statement showing the date, amount and purpose of each expenditure made or liability incurred, together with the full name, residence and mailing address of each person, firm, association, or committee to whom such expenditure was made or liability incurred, and the total amount of such expenditures made and liabilities incurred during the period covered by this statement.

DATE	PURPOSE OF EXPENDITURE AND TO WHOM (First Name, M. I., Last Name)	RESIDENCE AND MAILING ADDRESS	AMOUNT
10-15-76	Logan Banner	Logan, West Virginia	1,170.00
10-28-76	Logan News Printers	Logan, West Virginia	18.75
10-29-76	Park Restaurant	Logan, West Virginia	1,733.75
11-1-76	Logan Bank & Trust	Logan, W. Va. - 18,827.00	250.00 cash
	*TO DISTRICT COORDINATORS to distribute to precinct captains for the purposes set forth in Chapter 3, Article 8, Section 9, of the Code of West Virginia.		19,077.00 *
	DISTRIBUTED TO	AMOUNT	
	Ralph Grimmett	3,750.00	
	Ralph Grimmett	1,100.00	
	Claude Ellis & Swansey Evans	5,100.00	
	Michall H. Hill & Vernon Dingess	4,150.00	
	Harold Hale	3,600.00	
	Claude Ellis	1,377.00	
		\$19,077.00	
11-8-76	Logan Coca-Cola Bot. Co.	Logan, West Va.	24.00
11-8-76	Logan News Printers	Logan, West Va.	300.00
11-29-76	Logan News Printers	Logan, West Va.	97.50
11-29-76	Jean Queen	West Logan, West Va.	136.19
Any additional pages needed for other expenditures must include all of the above requested information.			
TOTAL			\$ 22,557.19

(G)

I further certify that this statement lists all financial transactions, as reported above in Sections C, D, and F, for the period beginning on the 28th day of October, 19 76, and ending on the 1st day of December, 19 76.

(H)

I further certify that the total expenditure for the nomination, election or defeat of my candidacy (or any person or organization advocating or opposing the nomination, election or defeat of any candidate), or the passage or defeat of any issue, thing or item to be voted upon, in whose behalf an expenditure was made or a contribution was given for the Election is \$ 22,557.19. (This total includes all expenditures made as of the date of this statement, including all expenditures previously reported in other statements.)

OATH OR AFFIRMATION

State of West Virginia

County of Logan, ss.

Thomas A. Tomblin, being duly sworn, deposes and says that the foregoing is a true and correct statement, to the best of his knowledge and belief, of all financial transactions occurring within the period covered by this statement.

Signature of Candidate, Agent, or Treasurer

Subscribed and sworn to before me this 2nd day of December, 19 76

Notary Public

My Commission expires on the 5th day of April, 19 78.

REQUEST FOR ADDITIONAL INFORMATION - PAGE TWO  
KEEP NICK RAHALL IN CONGRESS COMMITTEE  
30 DAY POST PRIMARY REPORT

On Schedule B you list \$14,000.00 in expenditures made to unregistered committees for election day expenses. Please provide further clarification as to the nature of those expenses.

On Schedule C your report discloses loans from Nick J. Rahall. Please clarify whether the amount loaned to the committee was from the candidate's personal funds, or a note obtained from a bank through the candidate. If the loans are from a bank, please provide the name and address of the lending institution and the interest rates and terms of the loans.

**EXPENSES**  
(Operating, Transfers Out, Contributions In Kind,  
Loans, Loan Repayments and Refunds Made)  
Supporting Lines 20a, 21a, and 22a, 22b, and 22c  
of FEC FORM 3

Page 1 of 1 22b  
Line Number

(Use Separate Schedules for  
each numbered line)

U.C. 20403

Name of Candidate or Committee in Full

**Keep Nick Rahall In Congress Committee**

Full Name, Mailing Address and ZIP Code  
**Committee For a Better Logan  
County**

**527 Stratton St.  
Logan, W. Va.**

Particulars of Expenditure  
**For Precinct Organizations  
and Election Day Expense**

Date (month,  
day, year)

**5/2/78**

Amount of each expend-  
ture this period

**5,000.00**

Full Name, Mailing Address and ZIP Code

**Independent Democrats Committee**

**P. O. Box 810  
Logan, W. Va.**

Particulars of Expenditure  
**For Precinct Organ.  
& Election Day Expense**

Date (month,  
day, year)

**5/2/78**

**5/5/78**

Amount of each expend-  
ture this period

**3,000.00**

**2,000.00**

Full Name, Mailing Address and ZIP Code  
**Mingo County Democrat Exec.  
Committee**

**Rastie Runyon  
Williamson, W. Va.**

Particulars of Expenditure  
**For Precinct Organization  
& Election Day Expense**

Date (month,  
day, year)

**5/3/78**

**5/5/78**

Amount of each expend-  
ture this period

**2,500.00**

**1,500.00**

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,  
day, year)

Amount of each expend-  
ture this period

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,  
day, year)

Amount of each expend-  
ture this period

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,  
day, year)

Amount of each expend-  
ture this period

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,  
day, year)

Amount of each expend-  
ture this period

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,  
day, year)

Amount of each expend-  
ture this period

Expenditure for  
☐ Primary ☐ General ☐ Other

**\$ 14,000.**

**\$ 14,000.**

SUBTOTAL of expenditures (in separate lines)

TOTAL of expenditures (in separate lines)



# Congressman Nick Rahall

REGULAR MAIL  
5 319

February 14, 1979

16 PM 3:09

MAINES

The Honorable Edmund L. Henshaw, Jr.  
Clerk of the House  
Room 1036 Longworth Building  
Washington, D. C.

054965

058319

Dear Mr. Henshaw:

My Campaign Treasurer, Anthony P. Gonzalez, has received several requests from the Federal Elections Commission to make certain clarifications to reports filed by both of my campaign committees - the Keep Nick Rahall In Congress Committee (#069965) and the Nick J. Rahall For Congress Committee (#05319). With your permission I will answer those requests in this letter as Mr. Gonzalez is not available at this time, and when he returns he will forward a letter to you verifying the information contained in this letter.

1) On August 25, 1978 the Commission requested clarification to the 10 day Pre-Primary Report for the Keep Nick Rahall In Congress Committee regarding a contribution listed as being received from the firm of Thornhill, Kennedy, and Vaughan on April 6, 1978 in the amount of \$500.00. Please correct the record to reflect:

- Warren A. Thornhill, III of 800 Woodlawn Avenue, Beckley, West Virginia, who is an attorney located in the Raleigh County National Bank Building in Beckley, West Virginia contributed \$166.67 to my Campaign Committee on April 6, 1978. His aggregate contributions to the date of the report were \$166.67.

- David T. Kennedy of 102 Mollohan Drive, Beckley, West Virginia who is an attorney located in the Raleigh County National Bank Building in Beckley, West Virginia contributed \$166.66 to my Campaign Committee on April 6, 1978 and that his aggregate contributions to the date of the report were \$166.66.

- James F. Vaughan, Jr. of 109 College Avenue, Beckley, West Virginia who is also an attorney with offices in the Raleigh County National Bank Building in Beckley, West Virginia contributed \$166.66 to the Committee on April 6, 1978, and his aggregate contributions to the date of the report were \$166.66

P.O. Box 64, Beckley, West Virginia 25801

A copy of our report is filed with and available for purchase from the Federal Election Commission, Washington, D.C. 20463.

2) On November 13, 1978 the Commission requested additional information from the Nick Joe Rahall For Congress Committee concerning their October 10, 1978 Report which showed an expenditure to the U.S. Postmaster as a "debt". The word "debt" which appears below the typed explanation of the expenditure was a typographical error on the part of the typist. The notation was an "in-house" note marking that the mailings were for contributions to retire the "debt". The Committee was not indebted to the U.S. Postmaster. Please correct the record to have the word "debt" deleted as it is irrelevant to the report.

3) On December 12, 1978 the Commission requested clarification to the Keep Nick Rahall In Congress Committee 30 Day Post Primary Report in two instances:

a) Further clarification as to the nature of the expenses of the Committee to which the Committee paid \$14,000 for "election day expense".


The monies "transferred" to the three political committees were to help defray the expenses the Committee had in the three counties for such things as signs, sample ballots, expenses for vehicles taking voters to the polls, and a 'get out the vote' type operation. It would be impossible for the Committee - the donor, to list specifically in each instance as to how the money donated was spent as the contributions were made to help defray the cost for the committee within the county. Further information on how the money was exactly spent will have to come from the committees.

b) The Commission requested further information on the personal loans the Candidate made to the Committee. Attached are new Schedule "C" forms which reflect the information requested.

I trust the above and the attached satisfies the requests made by the Commission and we will be happy to furnish additional information if further clarification is necessary.

With warm regard, I am

Sincerely,

  
NICK J. RAHALL, II  
Member of Congress

NJR/jmk

Enclosures



Memo to the File:

Allocation/West Virginia Committees  
11/7/79/Greevy  
Meeting with Ken Gross  
and: Bobby Werfel  
      Fran Hagan  
      Rick Halter  
      Dug Greevy

The above met this day to discuss the proposal which Audit and RAD jointly prepared and submitted to OGC regarding Allocation of Expenses by Party Committees/7/13/79.

Gross stated that Claire Lindsay had written a proposal in response to the Audit/RAD proposal prior to her departure. We discussed the need to have some specific guidelines for committees to follow if in fact we determine that action should be pursued against them.

However, we noted that the Commission thus far has not provided any certain guidance, particularly in the case of GOTV/ voter registration expenses made by committees which do not have segregated accounts.

Gross acknowledged our dilemma. In particular, we stated that there are several referrals received from Audit by RAD regarding WV committees which expended in excess of \$1,000 for GOTV. Based upon various formulas, the committees may or may not have to register with FEC. We stated that we did not think it right to send letters to the committees unless we could be more specific as to why they qualify as political committees.

Gross stated that he would forward to us a copy of the Lindsay proposal, and that he would review the amounts in question for the WV committees.

We are to respond to the Lindsay proposal as soon as possible so that a final decision can be made on this matter.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Treasurer  
Independent Democrats Committee  
Post Office Box 810  
Logan, West Virginia

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. It has come to our attention that your organization may have made expenditures to influence Federal elections during the calendar year 1978. In particular, your committee appears to have received \$5,000 from the Keep Nick Rahall in Congress Committee. These funds may have been used for get-out-the-vote activities. A copy of that portion of the report is attached.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" for 1978, subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

-2-

Please notify the Commission within thirty (30) days from the date of this letter of your decision on this matter. If you have any questions, please contact David Greevy, in our Reports Analysis Division at (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Thomas J. Haselhorst  
Assistant Staff Director

Enclosure



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1227

Date Filmed 4/22/81 Camera No. --- 2

Cameraman SPC