



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3520

DATE FILMED 8/7/72 CAMERA NO. 4

CAMERAMAN E.E.S.

92040914533

OGC 4685

TO: Federal Election Commission
Washington, DC

FROM: Andre Le Cann ✓
3514 Garfield St. NW
Washington, DC 20007

MUR 3520

RE: Complaint in regards to -
(1) Committee* C00250845
The President's Dinner/aka 1991 Republican Senate-House
Dinner Committee
(2) Committee* C00261719
The President's Dinner/aka 1992 Republican Senate-House
Dinner Committee

DATE: May 8, 1992

Issue*1 regarding the 1991 President's Dinner Committee:

There has not been any publicly disclosed accounting for the overreported discrepancy of \$159,550 to \$169,550 in total receipts from individuals as reported on Line 11. a. i. , Page 2 of form 3x, Mid-year, July 31, 1991 report (See Attachment A). The addition of itemized receipts as reported on Schedule A - Itemized Receipts, pages 1-118 is significantly less than the total reported on the bottom of page 118 of \$1,667,797.00.

Line 11. a. i.	1,667,797.00
Pages 1-118 (calculated)	1,508,247.00
Mr. Andrew J. Dodson, FEC	1,498,247.00
(2/92 calculation, See Attachment B)	

Overreported or missing itemized amount - \$159,550.00 to \$169,550

If the discrepancy is the case of overreported funds, it would not explain how as reported on line 22 of form 3x \$1,564,000.00 could be legally transferred to the National Republican Senatorial Committee and the National Republican Congressional Committee from the account with allowable federal receipts (Total federal receipts \$2,385,589.60, minus federal expenses, \$806,634.72, minus refunds, \$7,500, minus the discrepancy = \$1,409,404.88 to \$1,419,404.88). In the only other possible case, it seems to be a significant failure to report itemized receipts more than ten months

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after the filing deadline. The funds transferred to the National Republican Senatorial Committee and the National Republican Congressional Committee are required to be tracked as itemized incoming contribution memos, and thus the discrepancy can be compared in this manner.

Issue #2 regarding the 1991 President's Dinner Committee:

There's a discrepancy in the in-flow and out-flow of the Committee's non-federal account funds. The transfer out of funds from the non-federal account as reported on Schedule H3 exceeds the deposit history of contributions received into the non-federal account, 1991 Presidential Dinner Trust and Building Fund, as reported on Schedules A - memo.

Transfers out of The Presidential Dinner Trust account (See Attachment C)

1/15/91	\$22,022.28	Page 1, H3
1/31/91	36,082.85	
2/15/91	13,281.52	Page 2, H3
2/28/91	49,180.96	
3/21/91	80,000.00	Page 4, H3
3/25/91	33,900.84	

Issue #3 regarding 1991 and 1992 President's Dinner Committees:

The 1991 Dinner Committee, and the 1992 Dinner Committee potentially, failed in their solicitation materials to inform all contributors that they may designate contributions for a particular participant as required under 11 CFR 102.17(c)(2)(i)(C).

11 CFR 102.17(c)(2)(i)(C). A statement informing contributors that, notwithstanding the stated allocation formula, they may designate their contributions for a particular participant or participants;

The second page of the 1991 Dinner Committee solicitation states (See Attachment D):

"Paid for by The President's Dinner Committee. Proceeds will be evenly divided between the National Republican Senatorial Committee and the National Republican Congressional Committee for the benefit of Republican candidates. Donations may be designated or reallocated in order to comply with federal limits on political contributions."

9 2 0 4 0 9 1 4 5 3 6

The last sentence from the above statement does not indicate a subject of who would reallocate and who would designate. Is it the Dinner Committee? And/or is it the Contributor? It is discernable that the Dinner Committee would do the reallocating, so under any reasonable interpretation the sentence would have one subject and the Committee would also be the agent who would designate donations. The Committee's statement fails to state to whom the funds can be designated.

If the argument were to be made that this sentence of the solicitation notification is intended to have two elliptical subjects (contributor and committee) and an elliptical indirect object (participant), it remains inadequate and also misleading on another count. Donations may be designated not only to comply with federal limits on political contributions but because a contributor simply desires to donate to a particular participant.

An adequate phrasing of the Committee's improper notification might read more to the effect:

"... Contributors may designate donations to either one of the participants (NRSC or NRCC). The President's Dinner Committee may reallocate (or redesignate?) donations in order to comply with federal limits on political contributions."

Individuals who had not reached their contribution limits under federal limits but made contributions in excess of federal limits were not given sufficient information on the solicitation form and notification to designate part of their funds to the Republican National Senatorial Committee and/or the National Republican Congressional Committee through the federal account, with the remaining amount going to The President's Dinner Trust, as is required under 11 CFR 102.17(c)(2)(i)(C).

Although there is not any requirement that actual space or checkoff boxes be provided on the solicitation invitations to designate contributions, it may be interpreted as further indication that the solicitations did not meet any part of 11 CFR 102.17(c)(2)(i)(C) or the regulation's intent.

Issue #4 regarding the 1991 and 1992 President's Dinner Committees:

The 1991 President's Dinner solicitation notification states:

9 2 0 4 0 9 1 4 5 3 7

"Proceeds will be evenly divided between the National Republican Senatorial Committee and the National Republican Congressional Committee for support of Republican candidates.....".

Proceeds of the President's Dinner Committees, in any reasonable interpretation by a contributor, would include both contributions allowable towards federal campaign activities and contributions which are not. Most proceeds of the 1991 and 1992 Dinner Committees were deposited into non-Federal accounts with the title of The Presidential Dinner Trust and Building Fund.

If donations are going towards purchasing concrete, windows, labor, and other construction costs, then all contributors must be properly informed on the solicitation forms and notices. For example, using contributors' funds to pay for an airconditioning unit would not constitute "National Republican Senatorial Committee and National Republican Congressional Committee support for Republican candidates" under the test of an understanding or conclusion that a contributor could reasonably reach from the solicitation notification.

The test for solicitation notification statements that are not in full verbatim of federal laws and regulation codes should be to the effect that a contributor might reasonably understand the intent of the law or regulation. What the contributor may reasonably understand upon reading the notification is the terms upon which the agreement of a donation has been made.

Issue #5 regarding the 1991 and 1992 President's Dinner Committees:

The Dinner Committees improperly set two different minimum contribution amounts for the same exact "fundraising event offering" of an individual ticket or a reserved table to the President's Dinner to the same contributor groups. A contributor who exceeded or believed that he or she exceeded federal contribution limits was required by the solicitation form to pay \$500 more for the same individual ticket (See Appendix D). A PAC which exceeded federal contribution limits was required by the solicitation form to pay at least \$5,000 more than a PAC which had not exceeded federal contribution limits. It is not simply a case of proffering differently priced contribution tickets to all potential contributors or to different restricted groups, but for some reason the Committee has established discriminatory minimum "pricing" for the same offerings to the same contributor groups. The pricing scheme might appear as some form of regressive penalty against contributors for already making donations that the NRSC and NRCC should

view favorably. Contributors improperly solicited in excess of the required minimum contribution should be entitled to a refund of that amount.

From the outlined deficiencies in the wording of the solicitation notifications and the format of the solicitation form offerings, the conclusion can be reached that the 1991 and 1992 President's Dinner Committees intentionally deceived and improperly solicited contributors for the purpose of "balloning" the total amount of non-federal contributions.

Note: This complaint contains personal conclusions reached from examining public records of the Federal Election Commission.

Andre Le Carr

5/12/92

Andre Le Carr

Signed and sworn before me this 12th day of May, 1992, in Washington, DC.

Helene Perreault
Notary Public

My Commission Expires October 31, 1992

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REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 AUG -1 PM 3:19

1. NAME OF COMMITTEE (in full)
THE PRESIDENT'S DINNER/aka 1991 Republican Senate-House Dinner Committee

ADDRESS (number and street) ☐ Check if different than previously reported
1101 17th Street, NW - #808

CITY, STATE and ZIP CODE
Washington, DC 20036

2. FEC IDENTIFICATION NUMBER
C00250845

3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period or (Date)

4. TYPE OF REPORT

- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☒ July 31 Mid Year Report (pre-election Year Only)
- ☐ Termination Report

Monthly Report Due On:

- ☐ February 28 ☐ June 30 ☐ October 30
☐ March 31 ☐ July 31 ☐ November 30
☐ April 30 ☐ August 31 ☐ December 31
☐ May 31 ☐ September 30 ☐ January 31

- ☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election or
_____ in the State of _____

(a) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	Covering Period <u>1/1/91</u> through <u>6/30/91</u>		
6	(a) Cash on Hand January 1, 19 <u>91</u>		\$ -0-
	(b) Cash on Hand at Beginning of Reporting Period	\$ -0-	
	(c) Total Receipts (from Line 19)	\$ 3,684,885.98	\$ 3,684,885.98
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 3,684,885.98	\$ 3,684,885.98
7	Total Disbursements (from Line 30)	\$ 3,676,431.09	\$ 3,676,431.09
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 8,454.89	\$ 8,454.89
9	Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)	\$ -0-	For further information contact Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10	Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D)	\$ -0-	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer
Stan Horkaby (Treasurer) Trudy Matthes Barksdale (Assistant Treasurer)

Signature of Treasurer
Trudy Matthes Barksdale

Date **7/31/91**

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g

FEC FORM 3X

(Rev. 9-87)

USE FEC MAILING LABEL OR TYPE ON FRONT

2 5463 9 2 0 34 70 39 61 24053369

DETAILED SUMMARY PAGE **OF RECEIPTS AND DISBURSEMENTS** **PAGE 2, FEC FORM 28**

(Revised 1/1/91)

NAME OF COMMITTEE THE PRESIDENT'S DINNER/aka 1991 Republican Senate-House Dinner Committee		REPORT COVERING PERIOD FROM 1/1/91 TO 6/30/91	
		COLUMN A Total This Period	COLUMN B Calendar Year
I. Receipts			
11. Contributions (other than loans) From:			
a. Individual Persons Other Than Political Committees			
1. Refined (see Schedule A)		1,667,797.00	1,667,797.00
2. Unrefined		84,777.30	84,777.30
3. Total (add 1 and 2) >		1,752,574.30	1,752,574.30
b. Political Party Committees		-0-	-0-
c. Other Political Committees (such as PACs)		629,000.00	629,000.00
d. Total Contributions (add a, b, and c) >		2,381,574.30	2,381,574.30
12. Transfers From Affiliated/Other Party Committees		-0-	-0-
13. All Loans Received		-0-	-0-
14. Loan Repayments Received		-0-	-0-
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.)		1,030.75	1,030.75
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees		-0-	-0-
17. Other Federal Receipts (Dividends, Interest, etc.)		2,984.55	2,984.55
18. Transfers From Nonfederal Account for Joint Activity		1,299,296.38	1,299,296.38
19. Total Receipts (add 11d, 12, 13, 14, 15, 16, 17, and 18) >		2,684,885.98	2,684,885.98
20. Total Federal Receipts (subtract line 18 from line 19) >		2,385,589.60	2,385,589.60
II. Disbursements			
21. Operating Expenditures:			
a. Shared Federal/Non-Federal Activity (from Schedule H)			
1. Federal Share		806,634.71	806,634.71
2. Non-Federal Share		1,299,296.38	1,299,296.38
b. Other Federal Operating Expenditures		-0-	-0-
c. Total Operating Expenditures (Add a, b, and 1) >		2,105,931.09	2,105,931.09
22. Transfers to Affiliated/Other Party Committees		1,563,000.00	1,563,000.00
23. Contributions to Federal Candidates/Committees and Other Political Committees		-0-	-0-
24. Independent Expenditures (see Schedule E)		-0-	-0-
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (see Schedule F)		-0-	-0-
26. Loan Repayments Made		-0-	-0-
27. Loans Made		-0-	-0-
28. Refunds of Contributions To			
a. Individual/Persons Other Than Political Committees		7,500.00	7,500.00
b. Political Party Committees		-0-	-0-
c. Other Political Committees (such as PACs)		-0-	-0-
d. Total Contribution Refunds (Add a, b and c) >		7,500.00	7,500.00
29. Other Disbursements		-0-	-0-
30. Total Disbursements (add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) >		3,676,431.09	3,676,431.09
31. Total Federal Disbursements (subtract line 21 a i from line 30) >		2,377,134.71	2,377,134.71
III. Net Contributions/Operating Expenditures			
32. Total Contributions (other than loans) from line 11d)		2,381,574.30	2,381,574.30
33. Total Contribution Refunds (from line 28d)		7,500.00	7,500.00
34. Net Contributions (other than loans - subtract line 33 from 32)		2,374,074.30	2,374,074.30
35. Total Federal Operating Expenditures (add 21 a i and 21 b) >		806,634.71	806,634.71
36. Offsets to Operating Expenditures (from line 15)		1,030.75	1,030.75
37. Net Operating Expenditures (subtract line 36 from 35) >		805,603.96	805,603.96

9 12 0 34 70 39 51 24053470

Attachment A

SCHEDULE A

ITEMIZED RECEIPTS

See separate schedule for each category of the Qualified Secondary Page

Attachment A
PAGE 118 OF 1115
FOR LINE NUMBER 11(a)

Any information copied from each Receipt and Statement may not be sold or used by any person for the purpose of collecting contributions or for general services, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

THE PRESIDENT'S DINNER/aka 1991 Republican Senate-House Dinner

A. Full Name, Mailing Address and ZIP Code Vincent J. Mirra 14 Wall Street New York, NY 10005 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Fernandes, Bertsch & Mirra Occupation Partner Aggregate Year-to-Date > \$ 600.00	Date (month, day, year) 4/29/91	Amount of Receipt this Period \$600.00
B. Full Name, Mailing Address and ZIP Code Robert T. Sloni 14 Wall Street New York, NY 10005 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Fernandes, Bertsch & Mirra Occupation Aggregate Year-to-Date > \$ 600.00	Date (month, day, year) 4/29/91	Amount of Receipt this Period \$600.00
C. Full Name, Mailing Address and ZIP Code Warren P. Airey 14 Wall Street New York, NY 10005 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Fernandes, Bertsch & Mirra Occupation Aggregate Year-to-Date > \$ 600.00	Date (month, day, year) 4/29/91	Amount of Receipt this Period \$600.00
D. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 	Amount of Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 	Amount of Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 	Amount of Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 	Amount of Receipt this Period

SUBTOTAL of Receipts This Page (sectional)

TOTAL This Period (last page this line number only)

1,667.

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FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

Attachment B

*Letter
from
Andrew Dodson
FEC*

See Page 2

Stan Backaby, Treasurer
President's Dinner/REA 1991
Republican Senate - House Dinner
Committee
1101 17th Street, NW, #800
Washington, D.C. 20036

Identification Number: C00250045

Reference: Mid-Year Report (1/1/91-6/30/91)

Dear Mr. Backaby:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule H3 of your report discloses the receipt of a \$609,114 in-kind transfer from your non-federal account for shared direct fundraising. Schedule H3 of your report, pertinent portions attached, discloses numerous transactions in which the non-federal account provided 100% of the goods and services for a shared federal/non-federal fundraising activity. Schedule H3, however, discloses that all transactions for the event "900" should reflect the federal account providing at least 30.3% of the goods and services or payments to vendors. These transactions apparently result in your federal account's receipt of corporate contributions by virtue of your non-federal account providing 100% of various allocable costs. You are advised that contributions from corporations are prohibited by the Act, unless made from separate segregated funds established by the corporations. (2 U.S.C. §441b(a))

Although the Commission may take further legal steps concerning the acceptance of prohibited contributions, prompt action by your committee to transfer-out the amount will be taken into consideration.

-Your report does not include a Schedule H1 to allocate administrative and generic voter drive costs. This ratio is determined at the beginning of each two-year election cycle. All shared administrative and generic voter drive costs incurred during the two-year cycle

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* must be allocated according to this ratio, unless the federal account elects to pay a higher percentage of its cost. 11 CFR §106.5(b)(2), (d)(1), (d)(2) and 11 CFR §§104.10(b)(1)(ii)(B) and 106.6(c)

-Line 11(a)(i) of the Detailed Summary Page of your report discloses a total of \$1,667,797 in itemized contributions from individuals. The sum of the entries itemized on Schedule A, however, indicates the total to be \$1,490,247. Please amend your report to clarify the discrepancy.

-Your report discloses an apparent contribution(s) from a corporation(s) (pertinent portion attached). You are advised that a contribution from a corporation is prohibited by the Act, unless made from a separate segregated fund established by the corporation. (2 U.S.C. §441b(a)) If you have received a corporate contribution(s), the Commission recommends that you refund the full amount to the donor(s) in accordance with 11 CFR §103.3(b). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In the best interests of the committee, all refunds and transfers-out should be made within thirty (30) days of the treasurer's receipt of the contribution. See 11 CFR §103.3(b). Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 28 or 22 of the report covering the period during which they are made.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, prompt action by your committee to refund or transfer-out the amount will be taken into consideration.

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. Under 11 CFR §102.5(b), organizations which are not political committees under

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RECEIPT SCHEDULE H3
 (effective 1/1/91)

**TRANSFERS FROM
NON-FEDERAL ACCOUNTS**

 PAGE **1** OF **8**
 FOR LINE **18**

NAME OF COMMITTEE			TOTAL AMOUNT TRANSFERRED
THE PRESIDENT'S DINNER/aka 1991 Republican Senate-House Dinner			
NAME OF ACCOUNT		DATE OF RECEIPT	
The President's Dinner Trust - 1991 and Building Fund		1/15/91	\$ 22,022.28
BREAKDOWN OF TRANSFER RECEIVED			
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT
a) Total Administrative/Voter Drive			
b) Direct Fundraising (List Events-Amount for Each)			
a) The President's Dinner		22,022.28	
b) _____			
c) _____			
d) Total Amount Transferred For Direct Fundraising			
c) Exempt Activity/Direct Candidate Support (List Events-Amount For Each)			
a) _____			
b) _____			
c) _____			
d) Total Amount Transferred For Exempt Activity/Direct Candidate Support			
NAME OF ACCOUNT		DATE OF RECEIPT	
The President's Dinner Trust - 1991 and Building Fund		1/31/91	\$ 36,062.85
BREAKDOWN OF TRANSFER RECEIVED			
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT
a) Total Administrative/Voter Drive			
b) Direct Fundraising (List Events-Amount for Each)			
a) The President's Dinner		36,062.85	
b) _____			
c) _____			
d) Total Amount Transferred For Direct Fundraising			
c) Exempt Activity/Direct Candidate Support (List Events-Amount For Each)			
a) _____			
b) _____			
c) _____			
d) Total Amount Transferred For Exempt Activity/Direct Candidate Support			
TOTALS FOR BREAKDOWN OF TRANSFER RECEIVED			
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY DCS
SUBTOTAL THIS PAGE		58,085.13	58,085.13
TOTAL THIS PERIOD			

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RECEIPT SCHEDULE HS
(Effective 1/1/91)

TRANSFERS FROM
NON-FEDERAL ACCOUNTS

PAGE 2 OF 8
FOR LINE 10

NAME OF COMMITTEE THE PRESIDENT'S DINNER/aka 1991 Republican Senate-House Dinner			TOTAL AMOUNT TRANSFERRED
NAME OF ACCOUNT The President's Dinner Trust - 1991 and Building Fund		DATE OF RECEIPT 2/15/91	\$ 13,281.52
BREAKDOWN OF TRANSFER RECEIVED			
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT
a) Total Administrative/Voter Drive			
b) Direct Fundraising (List Events-Amount for Each)			
a) The President's Dinner		13,281.52	
b)			
c)			
d)			
e) Total Amount Transferred For Direct Fundraising			
f) Exempt Activity/Direct Candidate Support (List Events-Amount For Each)			
a)			
b)			
c)			
d)			
e) Total Amount Transferred For Exempt Activity/Direct Candidate Support			

NAME OF ACCOUNT The President's Dinner Trust - 1991 and Building Fund			DATE OF RECEIPT 2/28/91	\$ 49,180.96
BREAKDOWN OF TRANSFER RECEIVED				
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT	
a) Total Administrative/Voter Drive				
b) Direct Fundraising (List Events-Amount for Each)				
a) The President's Dinner		49,180.96		
b)				
c)				
d)				
e) Total Amount Transferred For Direct Fundraising				
f) Exempt Activity/Direct Candidate Support (List Events-Amount For Each)				
a)				
b)				
c)				
d)				
e) Total Amount Transferred For Exempt Activity/Direct Candidate Support				
TOTALS FOR BREAKDOWN OF TRANSFER RECEIVED				
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DCS	
SUBTOTAL THIS PAGE		62,462.48		62,462.48
TOTAL THIS PERIOD				

9120347009612415/25

Attachment C

RECEIPT SCHEDULE H3
(Effective 1/1/91)

TRANSFERS FROM
NON-FEDERAL ACCOUNTS

PAGE 3 OF 8
FOR LINE 18

NAME OF ORIGINATOR			TOTAL AMOUNT TRANSFERRED
THE PRESIDENT'S DINNER/aka 1991 Republican Senate-House Dinner			
NAME OF ACCOUNT The President's Dinner Trust - 1991 and Building Fund		DATE OF RECEIPT 3/5/91	\$ 179.20
BREAKDOWN OF TRANSFER RECEIVED			
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT
a) Total Administrative/Voter Drive			
b) Direct Fundraising (List Events-Amount for Each)			
a) The President's Dinner		179.20	
b)			
c)			
d) Total Amount Transferred For Direct Fundraising			
e) Exempt Activity/Direct Candidate Support (List Events-Amount For Each)			
a)			
b)			
c)			
d) Total Amount Transferred For Exempt Activity/Direct Candidate Support			
NAME OF ACCOUNT The President's Dinner Trust - 1991 and Building Fund		DATE OF RECEIPT 3/8/91	\$ 17,570.00
BREAKDOWN OF TRANSFER RECEIVED			
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT
a) Total Administrative/Voter Drive			
b) Direct Fundraising (List Events-Amount for Each)			
a) The President's Dinner		17,570.00	
b)			
c)			
d) Total Amount Transferred For Direct Fundraising			
e) Exempt Activity/Direct Candidate Support (List Events-Amount For Each)			
a)			
b)			
c)			
d) Total Amount Transferred For Exempt Activity/Direct Candidate Support			
TOTALS FOR BREAKDOWN OF TRANSFER RECEIVED			
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DCS
SUBTOTAL THIS PAGE		17,570.20	17,570.20
TOTAL THIS PERIOD			

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Attachment C

RECEIPT SCHEDULE H3
(effective 1/1/91)

TRANSFERS FROM
NON-FEDERAL ACCOUNTS

PAGE 4 OF 5
FOR LINE 10

NAME OF COMMITTEE THE PRESIDENT'S DINNER/aka 1991 Republican Senate-House Dinner			TOTAL AMOUNT TRANSFERRED
NAME OF ACCOUNT The President's Dinner Trust - 1991 and Building Fund		DATE OF RECEIPT 3/21/91	\$ 80,000.00
BREAKDOWN OF TRANSFER RECEIVED			
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT
1) Total Administrative/Voter Drive			
2) Direct Fundraising (List Events-Amount for Each)			
a) The President's Dinner		80,000.00	
b)			
c)			
d) Total Amount Transferred For Direct Fundraising			
3) Exempt Activity/Direct Candidate Support (List Events-Amount For Each)			
a)			
b)			
c)			
d) Total Amount Transferred For Exempt Activity/Direct Candidate Support			
NAME OF ACCOUNT The President's Dinner Trust - 1991 and Building Fund		DATE OF RECEIPT 3/25/91	\$ 33,900.84
BREAKDOWN OF TRANSFER RECEIVED			
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT
1) Total Administrative/Voter Drive			
2) Direct Fundraising (List Events-Amount for Each)			
a) The President's Dinner		33,900.84	
b)			
c)			
d) Total Amount Transferred For Direct Fundraising			
3) Exempt Activity/Direct Candidate Support (List Events-Amount For Each)			
a)			
b)			
c)			
d) Total Amount Transferred For Exempt Activity/Direct Candidate Support			
TOTALS FOR BREAKDOWN OF TRANSFER RECEIVED			
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DCS
SUBTOTAL THIS PAGE		113,900.84	113,900.84
TOTAL THIS PERIOD			

9 12 0 34 70 9 61 2415/437

Attachment D
Appendix D



THE PRESIDENT'S DINNER

1101 17th Street, N.W., Suite 600 • Washington, D.C. 20036

- ☐ **YES!** I (We) will attend The President's Dinner on Thursday, June 12.
Enclosed is a contribution in the amount of \$ _____ for:
- ☐ Individual ticket(s) at \$2,000
 - ☐ Table(s) at \$15,000

Please make checks payable to:
THE PRESIDENT'S DINNER

Corporate Contributions or Individual/PAC Contributions Exceeding Federal Limit:

- ☐ Individual ticket(s) at \$2,000
- ☐ Table(s) of ten at \$20,000

Please make checks payable to:
THE PRESIDENT'S DINNER TRUST

Each table buyer will receive a complimentary invitation admitting two individuals to one of the events listed below. Attendance will be limited at both receptions. Please indicate your choice by checking the appropriate space below:

- ☐ A private Reception hosted by President and Mrs. Bush.
- ☐ An exclusive Cabinet Reception hosted by Jack Kemp.

Note: Seating will be assigned according to order of response.

- ☐ **REGRETS.** I am unable to attend The President's Dinner this year. However, I have enclosed my maximum contribution in the amount of \$ _____ to help elect Republican candidates to the U.S. Senate and House of Representatives.

(Please make any corrections to your name and address)

- ☐ Special handicapped access will be needed for myself or one of my guests.
Please direct all questions and requests for additional information to: 202-699-1771.

Federal Election Law requires the following information:

Occupation

Employer

Business Address City/State/Zip

Business Telephone

Home Telephone

Signature

Date

Paid for by The President's Dinner Committee. Proceeds will be evenly divided between the National Republican Senatorial Committee and the National Republican Congressional Committee for the benefit of Republican candidates. Donations may be designated or reallocated in order to comply with federal limits on political contributions. Contributions to The President's Dinner are not deductible for federal income tax purposes.

Since The President's Dinner is a joint fundraising committee, federal law permits qualified multi-candidate Political Action Committees to contribute up to \$30,000 for candidate support (less contributions already given to the National Republican Senatorial Committee and the National Republican Congressional Committee in 1991). The annual contribution limit to each Committee is \$15,000.

Corporate, labor union, or personal contributions may be given without limit to The President's Dinner Trust but cannot be used for direct candidate support.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 18, 1992

Stan Huckaby, Treasurer
The President's Dinner/aka 1992
Republican Senate-House Dinner Committee
1101 17th Street, NW #808
Washington, DC 20036

RE: MUR 3520

Dear Mr. Huckaby:

The Federal Election Commission received a complaint which indicates that the President's Dinner/aka 1992 Republican Senate-House Dinner Committee ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3520. Please refer to this number in all future correspondence.

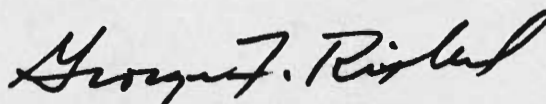
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Committee and you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



George F. Rishel
Assistant General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 18, 1992

Stan Huckaby, Treasurer
The President's Dinner/aka 1991
Republican Senate-House Dinner Committee
1101 17th Street, NW #808
Washington, DC 20036

RE: MUR 3520

Dear Mr. Huckaby:

The Federal Election Commission received a complaint which indicates that the President's Dinner/aka 1991 Republican Senate-House Dinner Committee ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3520. Please refer to this number in all future correspondence.

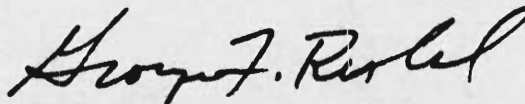
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Committee and you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

92040914552

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



George F. Rishel
Assistant General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 18, 1992

Andre LeCann
3514 Garfield Street, N.W.
Washington, D.C. 20007

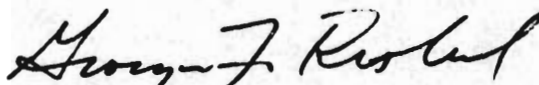
RE: MUR 3520

Dear Mr. LeCann:

This letter acknowledges receipt on May 12, 1992, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by The President's Dinner/aka 1991 Republican Senate-House Dinner Committee and Stan Huckaby, as treasurer, The President's Dinner/aka 1992 Republican Senate-House Dinner Committee and Stan Huckaby, as treasurer. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3520. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,


George F. Rishel
Assistant General Counsel

Enclosure
Procedures

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WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

June 8, 1992

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attn: Jeffrey Long

Re: MUR 3520 (1991 Republican
Senate-House Dinner Committee
and Stan Huckaby, as Treasurer;
1992 Republican Senate-House
Dinner Committee and Stan
Huckaby, as Treasurer)

Dear Mr. Noble:

This Response, along with the attached Affidavit and materials, is submitted on behalf of the 1991 Republican Senate-House Dinner Committee and Stan Huckaby, as Treasurer ("1991 Dinner Committee") and the 1992 Republican Senate-House Dinner Committee and Stan Huckaby, as Treasurer ("1992 Dinner Committee")¹ in response to a Complaint filed by André Le Cann and designated Matter Under Review ("MUR") 3520. An executed Statement of Designation of Counsel has been enclosed. For the reasons set forth herein, the Federal Election Commission should find no reason to believe that

¹ The 1991 Dinner Committee and the 1992 Dinner Committee will be collectively referred to as the "Dinner Committees."

92 JUN - 8 PM 4:28
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

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Lawrence M. Noble, Esq.
June 8, 1992
Page 2

either the 1991 Dinner Committee or the 1992 Dinner Committee violated the Federal Election Campaign Act of 1971, as amended ("Act").

Introduction

That 1991 Dinner Committee was the joint fundraising committee which operated pursuant to 11 C.F.R. § 102.17 for the purpose of conducting the 1991 Republican Senate-House Dinner. The National Republican Senatorial Committee ("NRSC") and the National Republican Congressional Committee ("NRCC") were participants in the 1991 Dinner Committee. The 1992 Dinner Committee is a joint fundraising committee which also operates pursuant to 11 C.F.R. § 102.17. The NRSC and the NRCC are also participants in the 1992 Dinner Committee.

The Complaint in this matter is against both the 1991 Dinner Committee and the 1992 Dinner Committee. The Complaint is easily broken down into two parts. The first part, which involves only the 1991 Dinner Committee addresses two reporting matters. The second part, which involves both the 1991 Dinner Committee and the 1992 Dinner Committee addresses their fundraising notices as well as the amount that a prospective contributor was requested to contribute to the Dinner Committees in order to attend the annual Republican Senate-House Dinner.

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I. The 1991 Dinner Committee Reports

1. Itemized Disbursements

9 2 0 4 0 9 1 4 5 5 7

The complainant first alleges that there is a discrepancy between the amount identified as the total of itemized contributions on the 1991 Mid-Year Report (line 11.a.1. and Schedule A, page 118) and the actual amount of itemized contributions reported on Schedule A pages 1 through 118 for that line. This discrepancy was raised by the Federal Election Commission in its Request for Additional Information issued February 7, 1992. Based on that inquiry, the 1991 Dinner Committee reviewed and on March 19 amended the line 11.a.1 and Schedule A, page 118 totals on the Mid-Year Report to confirm the amount of itemized contributions. See Affidavit of Trudy Matthes Barksdale Before the Federal Election Commission (hereinafter "Barksdale Aff.") at ¶ 3, Exhibit A. A copy of that amendment is attached as Exhibit B to this response. The Year-End Report has also been amended to reflect the changes to the Detailed Summary Page, line 11.a.i. See Exhibit B.

2. Schedule H-3 Transfers.

The complainant next alleges that the sum total of transfers from the 1991 Dinner Committee non-federal account to the allocation account identified on schedule H-3 of the 1991 Mid-Year Report exceeds the amount of receipts in the non-federal account at the time in question. The 1991 Dinner

Committee has reviewed its records and reports regarding this item. The amount shown as transferred on the schedule H-3 is accurate. See Barksdale Aff. at ¶ 4. However, the 1991 Dinner Committee has further amended the 1991 Mid-Year Report to reflect contributions to the non-federal account which did not previously appear on the memo entries for that account and were discovered in preparing this response. Id. A copy of that amendment is attached as Exhibit C to this response.

II. The 1991 and 1992 Dinner Committee Solicitations

1. Fundraising Notices

The Complaint alleges that "[t]he 1991 Dinner Committee, and the 1992 Dinner Committee potentially, failed in their solicitation materials to inform all contributors that they may designate their contributions for a particular participant as required under 11 C.F.R. 102.17(c)(2)(i)(C)."² Complaint at p.2. However, the complainant himself identifies language in the disclaimer which notifies contributors that they may designate their contributions. This language is that "[d]onations may be designated or reallocated in order to comply with federal limits on political contributions." Id. Acknowledging that this notice existed, the complainant's true complaint is one of grammar. The Complaint states that the

² The regulations do not specify exact language that must be used.

Lawrence M. Noble, Esq.
June 8, 1992
Page 5

statement does not indicate a subject of who would reallocate and who would designate. Is it the Dinner Committee? And/or is it the Contributor? It is discernable that the Dinner Committee would do the reallocating, so under any reasonable interpretation the sentence would have one subject and the Committee would also be the agent who would designate donations. The Committee's statement fails to state to whom the funds can be designated.

Complaint at p. 3. It is a fundamental principle of election law that contributors "designate" contributions. Thus, just as it is discernible that the Dinner Committee would reallocate (Complaint at p.3) a contributor, it is equally discernible that only a contributor may designate a contribution. The Dinner Committee cannot designate certain contributions since it has no power to do so.

Further, as indicated in the preceding notice ("proceeds will be evenly divided between the National Republican Senatorial Committee and the National Republican Congressional Committee for the benefit of Republican candidates"), all contributions are subject to the stated distribution formula. Thus, contributions will be so distributed unless they are designated or unless the distribution would cause the contribution to violate applicable limits, in which case the FEC Regulations grant the Dinner Committee the power to reallocate the contribution

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in such a way as to make it come within applicable legal limits. See 11 C.F.R. § 102.17

Finally, since there are only two participants in the Dinners, the NRSC and the NRCC, it is evident that a contributor may designate a contribution only between the two entities.³ Any other designation would not be a contribution to the 1991 Dinner Committee or to the 1992 Dinner Committee as the case may be. Furthermore, the disclaimer about which the complainant raises a question is the very same disclaimer which each Dinner Committee and its predecessors have been using for the past several years, and there has never been any confusion on the part of contributors as to whether they may designate contributions to the NRSC or the NRCC. Barksdale Aff. at ¶¶ 5 and 6. We note that the complainant has produced no evidence of any contributor being confused about the notices. According to the Dinner Committee's records, the complainant was not a

³ In an attempt to be clever, the complainant suggests that if an argument is made that the sentence is supposed to have "two elliptical subjects" then it is misleading because a contributor may designate a contribution "not only to comply with federal limits on political contributions but because a contributor simply desires to donate to a particular participant." Complaint at p. 3 (emphasis original). Neither the 1991 Dinner Committee nor the 1992 Dinner Committee is suggesting that a contribution may only be designated to comply with federal limits on contributions. Rather, a contributor may designate a contribution for any reason whatsoever, so long as that contribution will not violate any applicable limits. See Barksdale Aff. at ¶ 5.

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contributor. Ms. Barksdale states that some contributors in the past have in fact designated contributions thus suggesting that they were not "confused" about the notices or their legal rights. Barksdale Aff. at ¶ 5.

2. Contributions to the Non-Federal Accounts

The complainant also takes issue with the notice which states that "proceeds will be evenly divided between the National Republican Senatorial Committee and the National Republican Congressional Committee for the benefit of Republican candidates" because the Dinner Committees accept contributions to a non-federal account.

This allegation is simply disingenuous. First, the solicitations make clear that if a contributor wants to contribute to a federal account then the contribution must be made to "The President's Dinner." Thus, all contributions to the President's Dinner account are for the benefit of Republican Candidates. If, on the other hand, a contributor wants to contribute to the non-federal account then the contributions are made to "The President's Dinner Trust." Moreover, the very solicitation which the complainant attaches as an exhibit reads "[c]orporate, labor union, or personal contributions may be given without limit to The President's Dinner Trust but cannot be used for direct candidate support." Complaint Attachment D. Contributors

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are therefore made fully aware that contributions to different accounts will have different purposes.

3. Contribution Amounts

The Complainant's final allegation concerns the complainant's disapproval of the fact that the Dinner Committee "set two different minimum contribution amounts for the same exact 'fundraising event offering'." Complaint at p. 4. This allegation does not concern the Act. The Act, in section 441a(a), addresses only the maximum amount of permissible contributions; it does not address the amount contributors may be asked to contribute in order to attend an event. Those amounts are solely at the discretion of the soliciting entity, and it is completely legitimate to set two different contribution levels depending on the account to which the funds are being contributed.⁴

⁴ The complainant alleges that "the conclusion can be reached that the 1991 and 1992 President's Dinner Committee intentionally deceived and improperly solicited contributors for the purpose of 'ballooning' (sic) the total amount of non-federal contributions." Complaint at p. 5. There is nothing deceptive about the Dinner Committee's solicitations. Furthermore, the Dinner Committee prefers to raise the maximum amount permitted under federal law for direct candidate support. Basic principles of supply and demand suggest that a lower cost for the same good is an incentive. If the price of tickets were all at the amount of Trust donations, presumably three would be less federal money raised.

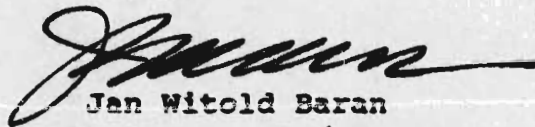
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Lawrence M. Noble, Esq.
June 8, 1992
Page 9

Conclusion

For the reasons set forth above, the Commission should find no reason to believe that the Dinner Committees violated the Act in this Matter.

Sincerely,



Jan Witold Baran



Carol A. Laham

Counsel for the 1991 Republican
Senate-House Dinner Committee,
and Stan Huckaby, as Treasurer,
and the 1992 Republican Senate-
House Dinner Committee, and
Stan Huckaby, as Treasurer

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EXHIBIT A

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Matter Under Review 3520

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to the Mid-Year Report correcting this discrepancy was filed in response to an FEC Request for Additional Information which the 1991 Dinner Committee received regarding this very item. The 1991 Year-End Report has also been filed confirming these totals.

4. The Complaint also states that the 1991 Dinner Committee transferred more money out of its non-federal account to its allocation account than the amount of receipts which the non-federal account had reported to date. I have reviewed the 1991 Dinner Committee Mid-Year Report and records regarding this allegation. The amount shown as transferred from the non-federal account to the allocation account is correct. However, some contributions were not on the Nemo Schedules for the 1991 Dinner Committee's Non-Federal Account. Again, an amendment has been filed regarding this matter.

5. The Complaint also raises a question with regard to the joint fundraising notices appended to the 1991 Dinner Committee solicitations. To my knowledge, all of the Dinner Committee stationery and solicitations carry the notices. Further, these notices have appeared on each year's Dinner Committee solicitations for the past several years. To my knowledge, there has never been any confusion over whether a contributor could designate a contribution to either the National Republican Senatorial Committee or the

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National Republican Congressional Committee, and in fact, several contributors do designate contributions in accordance with their own wishes as they are informed they may do. The only restriction on these designations is that the contribution must comply with applicable federal limits.

6. Finally, as a general principle, contributors are asked to write checks to the appropriate account in order to comply with federal limits on contributions. Thus, if it is apparent that a contribution will violate federal limits on contributions, the contributor is asked to write separate checks to the President's Dinner Account and to the President's Dinner Trust account as appropriate.

The above information is true and correct to the best of my knowledge.


Rudy Matthes Barksdale

District of Columbia

Subscribed to and sworn before me this 8th day of June, 1992.


Notary Public

My Commission Expires: 1-31-93

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EXHIBIT B

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REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) THE PRESIDENT'S DINNER/aka 1991 Republican Senate-House Dinner Committee		2. FEC IDENTIFICATION NUMBER C00250845
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 1101 17th Street, NW - #808		3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on (date).
CITY, STATE and ZIP CODE Washington, DC 20036		

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☒ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

<input type="checkbox"/> February 28	<input type="checkbox"/> June 30	<input type="checkbox"/> October 30
<input type="checkbox"/> March 30	<input type="checkbox"/> July 30	<input type="checkbox"/> November 30
<input type="checkbox"/> April 30	<input type="checkbox"/> August 30	<input type="checkbox"/> December 30
<input type="checkbox"/> May 30	<input type="checkbox"/> September 30	<input type="checkbox"/> January 31

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____

_____ in the State of _____

(b) Is this Report an Amendment?

☒ YES

☐ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>1/1/91</u> through <u>6/30/91</u>		
6. (a) Cash on Hand January 1, 19 <u>91</u>			\$ -0-
(b) Cash on Hand at Beginning of Reporting Period		\$ -0-	
(c) Total Receipts (from Line 19)		\$ 3,684,885.98	\$ 3,684,885.98
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 3,684,885.98	\$ 3,684,885.98
7. Total Disbursements (from Line 30)		\$ 3,676,431.09	\$ 3,676,431.09
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 8,454.89	\$ 8,454.89
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$ -0-	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Stan Huckaby (Treasurer) Trudy Matthes Barksdale (Assistant Treasurer)

Signature of Treasurer

Trudy Matthes Barksdale

Date

March 19, 1992

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X

(Revised 1/1/91)

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DETAILED SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS
PAGE 2, FEC FORM 3X

(revised 1/1/91)

NAME OF COMMITTEE **THE PRESIDENT'S DINNER/aka 1991
Republican Senate-House Dinner Committee**

REPORT COVERING PERIOD

FROM 1/1/91

TO: 6/30/91

	COLUMN A Total This Period	COLUMN B Calendar Year
I. Receipts		
11. Contributions (other than loans) From:		
a. Individual/Persons Other Than Political Committees		
i. Itemized (use Schedule A)	1,498,247.00	1,498,247.00
ii. Unitemized	281,327.30	281,327.30
iii. Total(add i and ii) >	1,779,574.30	1,779,574.30
b. Political Party Committees	-0-	-0-
c. Other Political Committees (such as PACs)	602,000.00	602,000.00
d. Total Contributions(add a iii, b and c) >	2,381,574.30	2,381,574.30
12. Transfers From Affiliated/Other Party Committees	-0-	-0-
13. All Loans Received	-0-	-0-
14. Loan Repayments Received	-0-	-0-
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.)	1,030.75	1,030.75
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees	-0-	-0-
17. Other Federal Receipts (Dividends, Interest, etc.)	2,984.55	2,984.55
18. Transfers from Nonfederal Account for Joint Activity	1,299,296.38	1,299,296.38
19. Total Receipts(add 11d, 12, 13, 14, 15, 16, 17, and 18) >	3,684,885.98	3,684,885.98
20. Total Federal Receipts(subtract line 16 from line 19) >	2,385,589.60	2,385,589.60
II. Disbursements		
21. Operating Expenditures:		
a. Shared Federal/Non-Federal Activity (from Schedule H4)		
i. Federal Share	806,634.71	806,634.71
ii. Non-Federal Share	1,299,296.38	1,299,296.38
b. Other Federal Operating Expenditures	-0-	-0-
c. Total Operating Expenditures(Add a i, a ii, and b) >	2,105,931.09	2,105,931.09
22. Transfers to Affiliated/Other Party Committees	1,563,000.00	1,563,000.00
23. Contributions to Federal Candidates/Committees and Other Political Committees	-0-	-0-
24. Independent Expenditures (use Schedule E)	-0-	-0-
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F) ..	-0-	-0-
26. Loan Repayments Made	-0-	-0-
27. Loans Made	-0-	-0-
28. Refunds of Contributions To:		
a. Individual/Persons Other Than Political Committees	7,500.00	7,500.00
b. Political Party Committees	-0-	-0-
c. Other Political Committees (such as PACs)	-0-	-0-
d. Total Contribution Refunds(Add a, b and c) >	7,500.00	7,500.00
29. Other Disbursements	-0-	-0-
30. Total Disbursements(add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) >	3,676,431.09	3,676,431.09
31. Total Federal Disbursements(subtract line 21 a ii from line 30) >	2,377,134.71	2,377,134.71
III. Net Contributions/Operating Expenditures		
32. Total Contributions (other than loans)(from line 11d)	2,381,574.30	2,381,574.30
33. Total Contribution Refunds (from line 28d)	7,500.00	7,500.00
34. Net Contributions (other than loans)(subtract line 33 from 32)	2,374,074.30	2,374,074.30
35. Total Federal Operating Expenditures(add 21 a i and 21 b) >	806,634.71	806,634.71
36. Offsets to Operating Expenditures (from line 15)	1,030.75	1,030.75
37. Net Operating Expenditures(subtract line 36 from 35) >	805,603.96	805,603.96

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Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

THE PRESIDENT'S DINNER/aka 1991 Republican Senate-House Dinner

<p>A. Full Name, Mailing Address and ZIP Code</p> <p>Vincent J. Mirra 14 Wall Street New York, NY 10005</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Fernandes, Bartach & Mirra</p> <p>Occupation Partner</p> <p>Aggregate Year-to-Date > \$ 600.00</p>	<p>Date (month, day, year) 4/29/91</p>	<p>Amount of Each Receipt this Period MEMO 600.00</p>
<p>B. Full Name, Mailing Address and ZIP Code</p> <p>Robert T. Siani 14 Wall Street New York, NY 10005</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Fernandes, Bartach & Mirra</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$ 600.00</p>	<p>Date (month, day, year) 4/29/91</p>	<p>Amount of Each Receipt this Period MEMO 600.00</p>
<p>C. Full Name, Mailing Address and ZIP Code</p> <p>Warren P. Airey 14 Wall Street New York, NY 10005</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Fernandes, Bartach & Mirra</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$</p>	<p>Date (month, day, year) 4/29/91</p>	<p>Amount of Each Receipt this Period MEMO 600.00</p>
<p>D. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>E. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>F. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>G. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (next page this line number only)

1,498,247.00

92040914571

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee:

The President's Dinner/aka 1991 Republican Senate-House Dinner Committee

General Electric PAC

EMPLOYER

OCCUPATION:

1331 Pennsylvania Avenue
Washington, DC 20036Date
05/30/91Amount
6,000.00

RECEIPT FOR: N/A

AGGREGATE YTD: 6,000.00

Glenmore Distilleries Company
PAC

EMPLOYER

OCCUPATION:

1700 Citizens Plaza
Louisville, KY 40202Date
05/08/91Amount
3,000.00

RECEIPT FOR: N/A

AGGREGATE YTD: 3,000.00

Goldman Sachs PAC

EMPLOYER

OCCUPATION:

Suite 900
1101 Pennsylvania Avenue, N.W.
Washington, DC 20004Date
05/09/91Amount
15,000.00

RECEIPT FOR: N/A

AGGREGATE YTD: 15,000.00

EMPLOYER

OCCUPATION:

Date

Amount

RECEIPT FOR: N/A

AGGREGATE YTD:

EMPLOYER

OCCUPATION:

Date

Amount

RECEIPT FOR: N/A

AGGREGATE YTD:

Health Insurance PAC

EMPLOYER

OCCUPATION:

Suite 1200
1025 Connecticut Avenue, N.W.
Washington, DC 20036Date
05/28/91Amount
3,000.00

RECEIPT FOR: N/A

AGGREGATE YTD: 3,000.00

Heitman Financial Services Lt
Suite 3600 LTD. - PAC

EMPLOYER

OCCUPATION:

180 N. La Salle Street
Chicago, IL 60601Date
06/10/91Amount
15,000.00

RECEIPT FOR: N/A

AGGREGATE YTD: 15,000.00

DELETE:
SEE MEMO
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NON-FED-
ERAL AC

SUBTOTAL of Receipts This Page:

27,000.00

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Name of Committee:

The President's Dinner/aka 1991 Republican Senate-House Dinner Committee

Stone-Pac

EMPLOYER
OCCUPATION:150 North Michigan Avenue
Chicago, IL 60601Date
05/28/91Amount
5,000.00

RECEIPT FOR: N/A

AGGREGATE YTD: 5,000.00

EMPLOYER
OCCUPATION:

Date

Amount

RECEIPT FOR: N/A

AGGREGATE YTD:

TGI Fridays, Inc. Political
Action CommitteeEMPLOYER
OCCUPATION:P.O. Box 809062
Dallas, TX 75380Date
04/09/91Amount
15,000.00

RECEIPT FOR: N/A

AGGREGATE YTD: 15,000.00

EMPLOYER
OCCUPATION:

Date

Amount

RECEIPT FOR: N/A

AGGREGATE YTD:

Television & Radio Political
Action CommitteeEMPLOYER
OCCUPATION:1771 N Street, N.W.
Washington, DC 20036Date
06/12/91Amount
15,000.00

RECEIPT FOR: N/A

AGGREGATE YTD: 15,000.00

The Bluebonnet Fund PAC

EMPLOYER
OCCUPATION:3000 One Shell Plaza
Houston, TX 77002Date
04/04/91Amount
15,000.00

RECEIPT FOR: N/A

AGGREGATE YTD: 15,000.00

The Carlyle Group PAC

EMPLOYER
OCCUPATION:1001 Pennsylvania Avenue, NW
Washington, DC 20004Date
06/17/91Amount
12,000.00

RECEIPT FOR: N/A

AGGREGATE YTD: 12,000.00

SUBTOTAL of Receipts This Page:

50,000.00

DELETE
LISTED
ON SCH
ULE A,
LINE 1

92040914573

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee:

The President's Dinner/aka 1991 Republican Senate-House Dinner Committee

EMPLOYER
OCCUPATION:

Date

Amount

RECEIPT FOR: N/A

AGGREGATE YTD:

EMPLOYER
OCCUPATION:

Date

Amount

RECEIPT FOR: N/A

AGGREGATE YTD:

EMPLOYER
OCCUPATION:

Date

Amount

RECEIPT FOR: N/A

AGGREGATE YTD:

Westinghouse Employees Political
Suite 800 Participation Program

EMPLOYER

OCCUPATION:

1801 K Street NW

Date

Amount

Washington, DC 20006

06/11/91

1,500.00

RECEIPT FOR: N/A

AGGREGATE YTD: 1,500.00

SUBTOTAL of Receipts This Page:

1,500.00

TOTAL This Period:

602,000.00

92040914574

SCHEDULE A

ITEMIZED RECEIPTS

MEMO SCHEDULE - NON-FEDERAL ACCOUNT

separate schedule(s)
each category of the
Detailed Summary PagePAGE OF
35 135
FOR LINE NUMBER
116

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

THE PRESIDENT'S DINNER/aka 1991 Republican Senate-House Dinner

A. Full Name, Mailing Address and ZIP Code Woodward & Lothrop 2800 Eisenhower Ave. Alexandria, VA 22314 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Holding Room Furniture-Toiletries Occupation Aggregate Year-to-Date > \$	Date (month, day, year) as of 6/23/91	Amount of Each Receipt this Period <u>LN-KWD</u> 3,500.00
B. Full Name, Mailing Address and ZIP Code Heitman Financial Services Ltd. Suite 3600 180 N. La Salle Street Chicago, IL 60601 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer N/A Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 6/10/91	Amount of Each Receipt this Period 15,000.00
C. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 	Amount of Each Receipt this Period
D. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

3,192,007.00

92040914575

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) THE PRESIDENT'S DINNER/aka 1991 Republican Senate-House Dinner Committee		2. FEC IDENTIFICATION NUMBER C00250845
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 1101 17th Street, NW - #808		3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on (date).
CITY, STATE and ZIP CODE Washington, DC 20036		

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☒ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

<input type="checkbox"/> February 20	<input type="checkbox"/> June 20	<input type="checkbox"/> October 20
<input type="checkbox"/> March 20	<input type="checkbox"/> July 20	<input type="checkbox"/> November 20
<input type="checkbox"/> April 20	<input type="checkbox"/> August 20	<input type="checkbox"/> December 20
<input type="checkbox"/> May 20	<input type="checkbox"/> September 20	<input type="checkbox"/> January 31

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☒ YES ☐ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>7/1/91</u> through <u>12/31/91</u>		
6. (a) Cash on Hand January 1, 19 <u>91</u>			\$ -0-
(b) Cash on Hand at Beginning of Reporting Period		\$ 8,454.89	
(c) Total Receipts (from Line 19)		\$ 377,145.03	\$ 4,062,031.01
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 385,599.92	\$ 4,062,031.01
7. Total Disbursements (from Line 30)		\$ 374,856.25	\$ 4,051,287.34
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 10,743.67	\$ 10,743.67
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$ -0-	For further information contact: Federal Election Commission 990 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3129
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$ -0-	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Stan Huckaby (Treasurer) Trudy Matthes Barksdale (Assistant Treasurer)

Signature of Treasurer

Trudy Matthes Barksdale

Date

June 8, 1992

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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92040914576

NAME OF COMMITTEE THE PRESIDENT DINNER/aka 1991
Republican Senate-House Dinner Committee

REPORTING PERIOD
FROM 1/1/91 **TO** 12/31/91

I. Receipts

11. Contributions (other than loans) From:

a. Individual/Persons Other Than Political Committees

I. Itemized (use Schedule A).....

II. Unitemized.....

III. Total.....(add I and II) >

b. Political Party Committees.....

c. Other Political Committees (such as PACs).....

d. Total Contributions.....(add a II, b and c) >

12. Transfers From Affiliated/Other Party Committees.....

13. All Loans Received.....

14. Loan Repayments Received.....

15. Offsets To Operating Expenditures (Refunds, Rebates, etc.).....

16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....

17. Other Federal Receipts (Dividends, Interest, etc.).....

18. Transfers from Nonfederal Account for Joint Activity.....

19. Total Receipts.....(add 11d, 12, 13, 14, 15, 16, 17, and 18) >

20. Total Federal Receipts.....(subtract line 18 from line 19) >

II. Disbursements

21. Operating Expenditures:

a. Shared Federal/Non-Federal Activity (Item Schedule H4)

I. Federal Share.....

II. Non-Federal Share.....

b. Other Federal Operating Expenditures.....

c. Total Operating Expenditures.....(Add a I, a II, and b) >

22. Transfers to Affiliated/Other Party Committees.....

23. Contributions to Federal Candidates/Committees and Other Political Committees.....

24. Independent Expenditures (see Schedule E).....

25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (see Schedule F)..

26. Loan Repayments Made.....

27. Loans Made.....

28. Refunds of Contributions To:

a. Individual/Persons Other Than Political Committees.....

b. Political Party Committees.....

c. Other Political Committees (such as PACs).....

d. Total Contribution Refunds.....(Add a, b and c) >

29. Other Disbursements.....

30. Total Disbursements.....(add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) >

31. Total Federal Disbursements.....(subtract line 21 a II from line 30) >

III. Net Contributions/Operating Expenditures

32. Total Contributions (other than loans)(from line 11d).....

33. Total Contribution Refunds (from line 28d).....

34. Net Contributions (other than loans)(subtract line 33 from 32).....

35. Total Federal Operating Expenditures.....(add 21 a I and 21 b) >

36. Offsets to Operating Expenditures (from line 15).....

37. Net Operating Expenditures.....(subtract line 36 from 35) >

COLUMN A Total This Period	COLUMN B Calendar Year
36,275.00	1,534,522.00
14,236.50	295,563.80
50,511.50	1,830,085.80
-0-	-0-
24,500.00	626,500.00
75,011.50	2,456,585.80
40,000.00	40,000.00
-0-	-0-
-0-	-0-
-0-	1,030.75
-0-	-0-
10,44.14	4,028.69
261,089.39	1,560,385.77
377,145.03	4,062,031.01
116,055.64	2,501,645.24
101,266.86	907,901.57
261,089.39	1,560,385.77
-0-	-0-
362,356.25	2,468,287.34
-0-	1,563,000.00
-0-	-0-
-0-	-0-
-0-	-0-
-0-	-0-
-0-	-0-
12,500.00	20,000.00
-0-	-0-
-0-	-0-
12,500.00	20,000.00
-0-	-0-
374,856.25	4,051,287.34
113,766.86	2,490,901.57
75,011.50	2,456,585.80
12,500.00	20,000.00
62,511.50	2,436,585.80
101,266.86	907,901.57
-0-	-0-
101,266.86	907,901.57

92040914577

92040914578

EXHIBIT C

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) THE PRESIDENT'S DINNER/aka 1991 Republican Senate-House Dinner Committee	
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 1101 17th Street, NW - #808	2. FEC IDENTIFICATION NUMBER C00250845
CITY, STATE and ZIP CODE Washington, DC 20036	3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☒ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

<input type="checkbox"/> February 20	<input type="checkbox"/> June 20	<input type="checkbox"/> October 20
<input type="checkbox"/> March 20	<input type="checkbox"/> July 20	<input type="checkbox"/> November 20
<input type="checkbox"/> April 20	<input type="checkbox"/> August 20	<input type="checkbox"/> December 20
<input type="checkbox"/> May 20	<input type="checkbox"/> September 20	<input type="checkbox"/> January 31

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☒ YES ☐ NO

SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
<u>1/1/91</u> through <u>6/30/91</u>		
6. (a) Cash on Hand January 1, 19 <u>91</u>		\$ -0-
(b) Cash on Hand at Beginning of Reporting Period	\$ -0-	
(c) Total Receipts (from Line 19)	\$ 3,684,885.98	\$ 3,684,885.98
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 3,684,885.98	\$ 3,684,885.98
7. Total Disbursements (from Line 30)	\$ 3,676,431.09	\$ 3,676,431.09
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 8,454.89	\$ 8,454.89
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ -0-	For further information contact: Federal Election Commission 950 E Street, NW Washington, DC 20463 Toll Free 800-424-9630 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ -0-	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Stan Huckaby (Treasurer) Trudy Matthes Barksdale (Assistant Treasurer)

Signature of Treasurer

Trudy Matthes Barksdale

Date

June 8, 1992

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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FEC FORM 3X

(revised 1/1/91)

92040914579

**DETAILED SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS
PAGE 2, FEC FORM 3X**

(revised 1/1/91)

NAME OF COMMITTEE THE PRESIDENT'S DINNER/aka 1991
Republican Senate-House Dinner Committee

REPORT COVERING PERIOD
FROM 1/1/91 TO: 6/30/91

	COLUMN A Total This Period	COLUMN B Calendar Year
I. Receipts		
11. Contributions (other than loans) From:		
a. Individual/Persons Other Than Political Committees		
I. Itemized (use Schedule A)	1,498,247.00	1,498,247.00
II. Unitemized	281,327.30	281,327.30
II. Total (add I and II) >	1,779,574.30	1,779,574.30
b. Political Party Committees	-0-	-0-
c. Other Political Committees (such as PACs)	602,000.00	602,000.00
d. Total Contributions (add a II, b and c) >	2,381,574.30	2,381,574.30
12. Transfers From Affiliated/Other Party Committees	-0-	-0-
13. All Loans Received	-0-	-0-
14. Loan Repayments Received	-0-	-0-
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.)	1,030.75	1,030.75
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees	-0-	-0-
17. Other Federal Receipts (Dividends, Interest, etc.)	2,984.55	2,984.55
18. Transfers from Nonfederal Account for Joint Activity	1,299,296.38	1,299,296.38
19. Total Receipts (add 11d, 12, 13, 14, 15, 16, 17, and 18) >	3,684,885.98	3,684,885.98
20. Total Federal Receipts (subtract line 16 from line 19) >	2,385,589.60	2,385,589.60
II. Disbursements		
21. Operating Expenditures:		
a. Shared Federal/Non-Federal Activity (from Schedule H4)		
I. Federal Share	806,634.71	806,634.71
II. Non-Federal Share	1,299,296.38	1,299,296.38
b. Other Federal Operating Expenditures	-0-	-0-
c. Total Operating Expenditures (Add a I, a II, and b) >	2,105,931.09	2,105,931.09
22. Transfers to Affiliated/Other Party Committees	1,563,000.00	1,563,000.00
23. Contributions to Federal Candidates/Committees and Other Political Committees	-0-	-0-
24. Independent Expenditures (see Schedule E)	-0-	-0-
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(f)) (see Schedule F)	-0-	-0-
26. Loan Repayments Made	-0-	-0-
27. Loans Made	-0-	-0-
28. Refunds of Contributions To:		
a. Individual/Persons Other Than Political Committees	7,500.00	7,500.00
b. Political Party Committees	-0-	-0-
c. Other Political Committees (such as PACs)	-0-	-0-
d. Total Contribution Refunds (Add a, b and c) >	7,500.00	7,500.00
29. Other Disbursements	-0-	-0-
30. Total Disbursements (add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) >	3,676,431.09	3,676,431.09
31. Total Federal Disbursements (subtract line 21 a II from line 30) >	2,377,134.71	2,377,134.71
III. Net Contributions/Operating Expenditures		
32. Total Contributions (other than loans)(from line 11d)	2,381,574.30	2,381,574.30
33. Total Contribution Refunds (from line 28d)	7,500.00	7,500.00
34. Net Contributions (other than loans)(subtract line 33 from line 32)	2,374,074.30	2,374,074.30
35. Total Federal Operating Expenditures (add 21 a I and 21 b) >	806,634.71	806,634.71
36. Offsets to Operating Expenditures (from line 15)	1,030.75	1,030.75
37. Net Operating Expenditures (subtract line 36 from line 35) >	805,603.96	805,603.96

92040914580

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NAME OF COMMITTEE (in Full) THE PRESIDENT'S DINNER/aka 1991 Republican Senate-House Dinner Committee

A. Full Name, Mailing Address and ZIP Code NYNEX 1828 L Street, NW Suite 1000 Washington, DC 20036 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer N/A Occupation Aggregate Year-to-Date > \$15,000.00	Date (month, day, year) 1/12/91	Amount of Each Receipt this Period 15,000.00
B. Full Name, Mailing Address and ZIP Code The Tobacco Institute 1875 I Street, NW Washington, DC 20006 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer N/A Occupation Aggregate Year-to-Date > \$15,000.00	Date (month, day, year) 1/12/91	Amount of Each Receipt this Period 15,000.00
C. Full Name, Mailing Address and ZIP Code Food Marketing Institute 1750 K Street, NW Washington, DC 20006 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer N/A Occupation Aggregate Year-to-Date > \$15,000.00	Date (month, day, year) 1/12/91	Amount of Each Receipt this Period 15,000.00
D. Full Name, Mailing Address and ZIP Code Sun-Diamond Growers P.O. Box 9024 Plesanton, CA 94566 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer N/A Occupation Aggregate Year-to-Date > \$15,000.00	Date (month, day, year) 1/12/91	Amount of Each Receipt this Period 15,000.00
E. Full Name, Mailing Address and ZIP Code District 2 MEBA-AMO Vacation Plan 635 4th Avenue Brooklyn, NY 11232 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer N/A Occupation Aggregate Year-to-Date > \$15,000.00	Date (month, day, year) 1/17/91	Amount of Each Receipt this Period 15,000.00
F. Full Name, Mailing Address and ZIP Code Waste Management, Inc. 3003 Butterfield Rd. Oak Brook, Illinois 70521 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer N/A Occupation Aggregate Year-to-Date > \$15,000.00	Date (month, day, year) 1/22/91	Amount of Each Receipt this Period 15,000.00
G. Full Name, Mailing Address and ZIP Code Akin, Gump, Strauss, Hauer & Feld 1333 New Hampshire Avenue, NW Washington, DC 20036 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer N/A Occupation Aggregate Year-to-Date > \$15,000.00	Date (month, day, year) 1/23/91	Amount of Each Receipt this Period 15,000.00

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

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Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

THE PRESIDENT'S DINNER/aka 1991 Republican Senate-House Dinner Committee

A. Full Name, Mailing Address and ZIP Code AICPA Effective Legislation 1211 Avenue of The Americas New York, NY 10036-8775 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer N/A Occupation Aggregate Year-to-Date > \$ 15,000.00	Date (month, day, year) 2/15/91	Amount of Each Receipt this Period 15,000.00
B. Full Name, Mailing Address and ZIP Code Tilcon Connecticut, Inc. P.O. Box 1357 New Britain, CT 06050 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer N/A Occupation Aggregate Year-to-Date > \$ 15,000.00	Date (month, day, year) 3/4/91	Amount of Each Receipt this Period 15,000.00
C. Full Name, Mailing Address and ZIP Code Salomon Brothers, Inc. The Willard Office Bldg. 1455 Pennsylvania Avenue, NW-Suite 350 Washington, DC 20004 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer N/A Occupation Aggregate Year-to-Date > \$ 15,000.00	Date (month, day, year) 3/7/91	Amount of Each Receipt this Period 15,000.00
D. Full Name, Mailing Address and ZIP Code RJR Nabisco Washington, Inc. Suite 525 1455 Pennsylvania Avenue, NW Washington, DC 20004 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer N/A Occupation Aggregate Year-to-Date > \$ 15,000.00	Date (month, day, year) 3/8/91	Amount of Each Receipt this Period 15,000.00
E. Full Name, Mailing Address and ZIP Code Chilis, Inc. 1025 Connecticut Avenue, NW Suite 1010 Washington, DC 20036 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer N/A Occupation Aggregate Year-to-Date > \$ 15,000.00	Date (month, day, year) 3/12/91	Amount of Each Receipt this Period 15,000.00
F. Full Name, Mailing Address and ZIP Code American Cement Alliance, Inc. 1212 New York Avenue, NW Suite 520 Washington, DC 20005 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer N/A Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 3/12/91	Amount of Each Receipt this Period 15,000.00
G. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

3,387,007.00

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STATEMENT OF DESIGNATION OF COUNSELNUR 3520NAME OF COUNSEL: Jan Witold BaranADDRESS: Wiley, Rein & Fielding1776 K Street, N.W.Washington, D.C. 20006TELEPHONE: 202-429-7330

92 JUN -8 PM 5:21

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF FEDERAL COUNSEL

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

5/28/92
DateJ. Keith Helt, Treasurer
Signature

RESPONDENT'S NAME:

1991 Republican Senate-House Dinner
Committee and Stan Huckaby, as Treasurer
1992 Republican Senate-House Dinner
Committee and Stan Huckaby, as Treasurer

ADDRESS:

1107 - 17th St., N.W.
Suite 808
Washington, D.C. 20036

HOME PHONE: _____

BUSINESS PHONE: _____

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RECEIVED
F.E.C.
SECRETARIAT

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

92 JUL 17 AM 9:08

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

MUR 3520
DATE COMPLAINT RECEIVED
BY OGC May 15, 1992
DATE OF NOTIFICATION TO
RESPONDENTS May 18, 1992
STAFF MEMBERS George F. Rishel
Jeffrey D. Long

COMPLAINANT:

Andre Le Cann

RESPONDENTS:

The President's Dinner/aka 1991
Republican Senate-House Dinner
Committee and Stan Huckaby, as
treasurer

The President's Dinner/aka 1992
Republican Senate-House Dinner
committee and Stan Huckaby, as
treasurer

RELEVANT STATUTES:

2 U.S.C. § 434(b)
11 C.F.R. § 102.17
11 C.F.R. § 104.10
11 C.F.R. § 106.5

INTERNAL REPORTS CHECKED:

None

FEDERAL AGENCIES CHECKED:

None

I. GENERATION OF MATTER

This matter was generated by a complaint dated May 8, 1992, and filed May 15, 1992, by Andre Le Cann against The President's Dinner/aka 1991 Republican Senate-House Dinner Committee and Stan Huckaby, as treasurer, ("1991 Dinner Committee") and The President's Dinner/aka 1992 Republican Senate-House Dinner Committee and Stan Huckaby, as treasurer, ("1992 Dinner Committee") regarding certain reporting and fundraising notice

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allegations.¹ Counsel for the Respondents (the 1991 and 1992 Dinner Committees) filed a response on June 8, 1992.

The 1991 Dinner Committee was the joint fundraising committee of the National Republican Senatorial Committee ("NRSC") and the National Republican Congressional Committee ("NRCC"). The 1992 Dinner Committee is the joint fundraising committee for the NRSC and NRCC. Both operate pursuant to 11 C.F.R. § 102.17.²

II. FACTUAL AND LEGAL ANALYSIS

As the response correctly points out, the complaint may be divided into two parts. The first part involves only the 1991 Dinner Committee and two reporting issues. The second part involves both the 1991 and 1992 Dinner Committees and their fundraising notices and the amounts of contributions requested in order to attend the annual dinner.

A. 1991 Dinner Committee and Reporting Allegations

The complaint first alleges that there is a discrepancy between the amount identified as the total of itemized contributions on the 1991 Mid-Year Report and the actual amount

1.

2. On July 7, 1992, the NRSC submitted an advisory opinion request regarding the permissibility of a retroactive reallocation of fundraising expenses. In that request, counsel for the NRSC states: "this request does not encompass any joint fundraising events operated pursuant to 11 C.F.R. § 102.17, but encompasses purely NRSC fundraising events."

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of itemized contributions reported on Schedule A for that line. The response notes that this discrepancy was raised by the Reports Analysis Division in February and corrected by an amendment filed on March 19. The Year End Report was also amended to reflect changes to the Detailed Summary Page.

The complaint next alleges that the total of transfers from the 1991 Dinner Committee nonfederal account to the allocation account identified on Schedule H-3 of the 1991 Mid-Year Report exceeds the amount of receipts in the nonfederal account at that time. The response states that the accounts were reviewed and the amount of the transfer is accurate. The 1991 Dinner Committee did, however, amend its 1991 Mid-Year Report to reflect contributions to the nonfederal account which did not previously appear on the memo entries for that account and were discovered in preparing the response.

We note that the reporting error contained in the first allegation was corrected prior to the filing of the complaint in this matter through the normal RAD review procedures. Therefore, we recommend that Commission find reason to believe the 1991 Dinner Committee violated 2 U.S.C. § 434(b) but take no further action. The reporting error contained in the second allegation was corrected after the filing of the complaint. It relates, however, to the reporting requirements that arose for the first time in 1991 as a result of the Commission's new regulations at 11 C.F.R. § 104.10. These regulations imposed substantial, new reporting requirements on party committees, especially regarding their nonfederal accounts. Accordingly, the Commission has been

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working through the advisory opinion and rulemaking processes and the RAD review process to acquaint party committees and others with these new reporting requirements. As the Commission noted in AO 92-2, its "decisions to allow specific retroactive changes recognizes that the allocation regulations represent significant revisions to past practice and require a brief period of adjustment, i.e., the current election cycle, by political committees acting in good faith." Given the 1991 Dinner Committee's prompt action in amending its reports when the oversight was brought to its attention, we recommend that the Commission find reason to believe the 1991 Dinner Committee violated 11 C.F.R. § 104.10(a)(2) but take no further action.

B. Fundraising Notices and Requested Contribution Amounts

The complaint alleges that the fundraising notices of both the 1991 and 1992 Dinner Committees did not inform contributors that they could designate their contributions for a particular participant as required by 11 C.F.R. § 102.17(c)(2)(i)(C). This section provides that "a joint fundraising notice shall be included with every solicitation for contributions." 11 C.F.R. § 102.17(c)(2). This notice shall include a "statement informing contributors that, notwithstanding the stated allocation formula, they may designate their contributions for a particular participant or participants." 11 C.F.R. § 102.17(c)(2)(i)(C). The joint fundraising solicitation used by the two committees contained this notice:

Paid for by The President's Dinner Committee. Proceeds will be evenly divided between the National Republican Senatorial Committee and the National Republican Congressional Committee for the benefit of Republican

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candidates. Donations may be designated or reallocated in order to comply with federal limits on political contributions. Contributions to The President's Dinner are not deductible for federal income tax purposes.

Since The President's Dinner is a joint fundraising committee, federal law permits qualified multicandidate Political Action Committees to contribute up to \$30,000 for candidate support (less contributions already given to the National Republican Senatorial Committee and the National Republican Congressional Committee in 1991). The annual contribution limit to each Committee is \$15,000.

Corporate, labor union, or personal contributions may be given without limit to The President's Dinner Trust but cannot be used for direct candidate support.

8 The response notes that the complaint's allegation goes primarily
8 to the grammar of this notice. The response further asserts that
5 it is a fundamental principal of election law that only
4 contributors can designate a contribution. It also points out
1 that the notice said contributions would be evenly divided unless
9 otherwise designated, but that contributions may be reallocated
4 to bring contributions within the applicable limits. It points
0 out that the regulations give the recipient's joint fundraising
2 committee the power to make such a reallocation. See 11 C.F.R.
9 § 102.17(c)(2)(i)(D).

The response further posits that contributors would not be confused by the fundraising notice because there were only two participants to which a contribution could be designated. It adds that this disclaimer has been used for years and has not produced the kind of confusion alleged in the complaint. The response notes that some contributors in the past have designated their contributions to one participant or the other. The

response also points out that the regulation does not require any specific language.

The complaint also takes issues with the notice's statement that proceeds will be for the benefit of candidate support because the committees also accept contributions to their nonfederal accounts. The response calls this allegation disingenuous because all contributions to "The President's Dinner" are to the federal account and for candidate support while contributions to "The President's Dinner Trust" are to the nonfederal account. The response points out that the notice clearly states that such contributions "cannot be used for direct candidate support." Thus, we find no merit in this allegation.

While it may be possible to quibble about the grammatical construction of the notice, in our opinion it does not violate the requirements of 11 C.F.R. § 102.17(c)(2)(i)(C). When read as a whole, it adequately informed contributors they could designate their contribution to one participant or the other and the purposes of each account. Therefore, we recommend that the Commission find no reason to believe the 1991 and 1992 Dinner Committees violated 11 C.F.R. § 102.17(c)(2)(i)(C).

Finally, the complainant raises a question why there are different minimum contribution amounts for the same event with higher amounts requested for contributions to the nonfederal account (The President's Dinner Trust). The response points out that the Act governs only the maximum amount of permissible contributions to the federal account and does not address amounts contributors may be asked to contribute to nonfederal accounts or

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to attend an event. It argues that setting these nonfederal contribution amounts is solely within the discretion of the soliciting entity and that it is completely legitimate to set two different amounts. The response also counters the allegation that the differential was intended to "balloon" nonfederal contributions by pointing out that it would instead have the effect of raising the maximum amount permissible under federal law for the federal account because most persons who wanted to attend the event would elect to do so at the lower cost.

The solicitation set different contribution amounts for contributions to federal and nonfederal accounts. It set the cost of individual tickets at \$1,500 and tables at \$15,000 for contributions to the federal account. For nonfederal account contributions, it set the cost of individual tickets at \$2,000 and tables at \$20,000 for corporate contributions or individual or PAC contributions exceeding federal limits. Thus, the solicitation notice did not solicit excessive contributions to the federal account and adequately distinguished between contributions to the federal and nonfederal accounts. See 11 C.F.R. § 102.17(c)(2)(ii)(B). Thus, in our view the notice did not violate 11 C.F.R. § 102.17(c)(2)(ii)(B).

III. RECOMMENDATIONS

1. Find reason to believe that The President's Dinner/aka 1991 Republican Senate-House Dinner Committee and Stan Huckaby, as treasurer, violated 2 U.S.C. § 434(b) and 11 C.F.R. § 104.10 (a)(2) and take no further action.

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2. Find no reason to believe that The President's Dinner/aka 1991 Republican Senate-House Dinner Committee and Stan Huckaby, as treasurer, and The President's Dinner/aka 1992 Republican Senate-House Dinner Committee and Stan Huckaby, as treasurer, violated 11 C.F.R. §§ 102.17(c)(2)(i)(C) and 102.17(c)(2)(ii)(B).
3. Approve the appropriate letter.
4. Close the file.

Lawrence M. Noble
General Counsel

Date 7/16/92

BY: [Signature]
Lois G. Lerner
Associate General Counsel

Attachments

1. Response

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
The President's Dinner/aka 1991) MUR 3520
Republican Senate-House Dinner)
Committee and Stan Huckaby, as)
treasurer;)

The President's Dinner/aka 1992)
Republican Senate-House Dinner)
committee and Stan Huckaby, as)
treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 22, 1992, the Commission decided by a vote of 4-0 to take the following actions in MUR 3520:

1. Find reason to believe that The President's Dinner/aka 1991 Republican Senate-House Dinner Committee and Stan Huckaby, as treasurer, violated 2 U.S.C. § 434(b) and 11 C.F.R. § 104.10 (a)(2) and take no further action.
2. Find no reason to believe that The President's Dinner/aka 1991 Republican Senate-House Dinner Committee and Stan Huckaby, as treasurer, and The President's Dinner/aka 1992 Republican Senate-House Dinner Committee and Stan Huckaby, as treasurer, violated 11 C.F.R. §§ 102.17(c) (2)(i)(C) and 102.17(c)(2)(ii)(B).

(Continued)

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3. Approve the appropriate letter, as recommended in the General Counsel's Report dated July 16, 1992.
4. Close the file.

Commissioners Elliott, McDonald, McGarry and Thomas voted affirmatively for the decision; Commissioners Aikens and Potter did not cast votes.

Attest:

July 22, 1992
Date

Delores R. Hannis
for Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Fri., July 17, 1992 9:08 a.m.
Circulated to the Commission: Fri., July 17, 1992 11:00 a.m.
Deadline for vote: Wed., July 22, 1992 4:00 p.m.

dr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 30, 1992

Jan Witold Baran, Esquire
Wiley Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 3520
The President's Dinner/1991
Republican Senate-House Dinner
Committee and Stan Huckaby, as
treasurer

The President's Dinner/1992
Republican Senate-House Dinner
Committee and Stan Huckaby, as
treasurer

Dear Mr. Baran:

On May 18, 1992, the Federal Election Commission notified your clients, The President's Dinner/1991 Republican Senate-House Dinner Committee and Stan Huckaby, as treasurer, and The President's Dinner/1992 Republican Senate-House Dinner Committee and Stan Huckaby, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. On July 22, 1992, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe your clients violated 2 U.S.C. §§ 102.17(c)(2)(i)(C) and 102.17(c)(2)(ii)(B).

On that same date, the Commission also found reason to believe that The President's Dinner/aka 1991 Republican Senate-House Dinner Committee and Stan Huckaby, as treasurer, violated 2 U.S.C. §§ 434(b) and 104.10(a)(2). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file.

The Commission reminds you that failure to accurately report itemized contributions and transfers between non-federal and allocation accounts is a violation of the Act. Your clients should take immediate steps to insure that this activity does not occur in the future.

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Jan Witold Baran, Esquire
Page 2

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

Joan D. Aikens

Joan D. Aikens
Chairman

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 30, 1992

FILED

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Andre LeCann
3514 Garfield Street, N.W.
Washington, D.C. 20007

RE: MUR 3520

Dear Mr. LeCann:

This is in reference to the complaint you filed with the Federal Election Commission on May 12, 1992, concerning The President's Dinner committees.

Based on that complaint, on July 22, 1992, the Commission found, on the basis of the information in the complaint and information provided by the respondents, that there is no reason to believe The President's Dinner/aka 1991 Republican Senate-House Dinner Committee and Stan Huckaby, as treasurer, and The President's Dinner/aka 1992 Republican Senate-House Dinner Committee and Stan Huckaby, as treasurer, violated 2 U.S.C. §§ 102.17(c)(2)(i)(C) and 102.17(c)(2)(ii)(B).

On that same date, the Commission found reason to believe that The President's Dinner/aka 1991 Republican Senate-House Dinner Committee and Stan Huckaby, as treasurer, violated 2 U.S.C. §§ 434(b) and 104.10(a)(2). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file.

This matter will become part of the public record within 30 days. The Federal Election Campaign Act of 1971, as amended, allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3520

DATE FILMED 8/7/92 CAMERA NO. 4

CAMERAMAN E.E.S.

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