



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4190

DATE FILMED 4/4/95 CAMERA NO. 1

CAMERAMAN SES

5043632908

REPORTS ANALYSIS REFERRAL
TO
OFFICE OF GENERAL COUNSEL

DATE: June 25, 1992

ANALYST: ANDREW DODSON

I. COMMITTEE:

The President's Dinner/AKA 1991
Republican Senate-House Dinner
Committee (C00250845)
Stan Huckaby, Treasurer
1101 17th Street, NW, #808
Washington, DC 20036

II. RELEVANT STATUTE:

A. 11 CFR §106.5(g)(1), 2 U.S.C. §441b(a)
B. 2 U.S.C. §441b(a)

III. BACKGROUND:

- A. Receipt of Corporate In-Kind Contributions for Shared
Federal and Non-Federal Activity
11 CFR §106.5(g)(1), 2 U.S.C. §441b(a)

The 1991 Mid-Year Report of the President's Dinner/AKA
1991 Republican Senate-House Dinner Committee ("the
Committee") disclosed an in-kind transfer of \$609,114 on June
13, 1991 from the The President's Dinner Trust-1991 and
Building Fund for shared fundraising costs. This in-kind
transfer was subsequently disclosed as 100% non-federal
disbursements to twenty-nine (29) corporate vendors for
allocable fundraising activities (Attachment 2).

- B. Receipt of Apparent Corporate Contributions
2 U.S.C. §441b(a)

The Committee's report also disclosed an apparent
impermissible receipt of \$7,500 from the Metropolitan
Washington Orthopedic Association PAC, an apparent
unregistered organization, and \$12,000 from the Carlyle Group
PAC, an apparent corporation, on May 29, 1991 and June 17,
1991, respectively (Attachment 3).

On February 7, 1992, the Reports Analysis Division
("RAD") sent a Request for Additional Information ("RAI")
noting that the Committee received an in-kind transfer of

5043632909

\$609,114, from its non-federal account, and subsequently disclosed numerous payments for allocable fundraising costs which were provided solely by the non-federal account. The RFAI explained that these transactions resulted in the federal account's receipt of corporate contributions by virtue of the non-federal account providing 100% of various allocable costs and that any such contributions received by the Committee should be transferred-out of the Committee's federal account. The RFAI also questioned the permissibility of the funds received from the corporation (The Carlyle Group) and an unregistered organization (The Metropolitan Washington Orthopedic Association) (Attachment 4).

On February 27, 1992, RAD sent a Second Notice stating that the Committee had failed to respond to the RFAI of February 7, 1992 (Attachment 5).

On April 6, 1992 the RAD analyst spoke to Ms. Trudy Matthes Barksdale, the Committee's assistant treasurer, and informed her that the Committee had not responded to the RFAI of February 7, 1992. Ms. Barksdale stated that the Committee's response would be filed promptly (Attachment 6).

On April 9, 1992 the Commission received the Committee's response to the RFAI of February 7, 1992 (Attachment 7). The Committee's response indicated that the in-kind contributions were originally received by the Committee's non-federal account and subsequently used for an allocable joint fundraising activity. As a result, the non-federal account provided 100% of various allocable expenses and the Committee felt it was necessary to "adjust upwards" the federal share of other Committee expenses to account for these non-federal receipts and maintain a proper allocation ratio. The Committee stated that "In fact, we refigured the federal share of expenditures other than the in-kind contributions at approximately 53.9%, so that the overall allocation would match the 38.3% federal/61.7% non-federal requirement."

The Committee's response also indicated that the Committee had been misinformed by the Metropolitan Washington Orthopedic Association about the corporate sources of their funds. The Committee transferred \$7,500 on March 13, 1992 to its non-federal account and included a copy of the transfer check with the response. Although the Committee's response indicated that The Carlyle Group is a partnership, information provided to the Commission by the District of Columbia Corporate Division disclosed that The Carlyle Group was registered as a corporation in the District of Columbia on May 9, 1988.

5043632910

FEDERAL ELECTION COMMISSION
1991-1992
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 18JUN92

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	OF MICROFILM LOCATION TYPE OF FILER
PRESIDENT'S DINNER/1991 REPUBLICAN SENATE-HOUSE DINNER COMMITTEE				ID #000250845 PARTY QUALIFIED		
CONNECTED ORGANIZATION: NRCC NRSC				JOINT FUNDRAISING		
1991 STATEMENT OF ORGANIZATION				11MAR91	2	91FEC/690/0177
CONDUIT REPORT				13JUN91	18	91FEC/698/0136
MID-YEAR REPORT		3,684,885	3,676,431	1JAN91 -30JUN91	241	91FEC/706/5036
MID-YEAR REPORT - AMENDMENT		-	-	1JAN91 -30JUN91	5	92FEC/746/1462
MID-YEAR REPORT - AMENDMENT		3,684,885	3,676,431	1JAN91 -30JUN91	4	92FEC/756/0613
REQUEST FOR ADDITIONAL INFORMATION				1JAN91 -30JUN91	7	92FEC/737/3389
REQUEST FOR ADDITIONAL INFORMATION 2ND				1JAN91 -30JUN91	8	92FEC/741/0424
YEAR-END		377,145	374,856	1JUL91 -31DEC91	40	92FEC/735/0040
YEAR-END - AMENDMENT		377,145	374,856	1JUL91 -31DEC91	2	92FEC/758/0618
REQUEST FOR ADDITIONAL INFORMATION				1JUL91 -31DEC91	1	92FEC/746/1426
REQUEST FOR ADDITIONAL INFORMATION 2ND				1JUL91 -31DEC91	2	92FEC/753/3621
1992 APRIL QUARTERLY		77	7,500	1JAN92 -31MAR92	4	92FEC/748/4831
TOTAL		4,062,107	0 4,058,787			334 TOTAL PAGES

All reports have been reviewed.

Cash on hand as of 3/31/92: \$3,221
Debts owed to the Committee as of 3/31/92: \$0.00
Debts owed by the Committee as of 3/31/92: \$0.00

5743632911

Attachment 2
Pg 1 of 6

RECEIPT SCHEDULE NO
(Effective 1/1/84)

TRANSFERS FROM
NON-FEDERAL ACCOUNTS

PAGE A	OF B
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 6/28/91
\$ 231,610.83	

	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) <u>The President's Dinner</u>		231,610.83	
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			

ADD

NAME OF ACCOUNT The President's Dinner Trust - 1991 and Building Fund	DATE OF RECEIPT 6/13/91	\$ 609,114.00 (In-Kind)
-------------------------------------------------------------------------------------	-----------------------------------	------------------------------------

	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) <u>The President's Dinner</u>		609,114.00 (In-Kind)	
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/DIRECT CANDIDATE SUPPORT
SUBTOTAL THIS PAGE		\$40,724.83	\$40,724.83
TOTAL THIS PERIOD		1,299,296.30	1,299,296.30

1037057135

NAME OF COMMITTEE

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

A. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Saturn Corp 4701 Lydell Rd Cheverly, MD 20781	Computer services/TPD	6/28/91	532.45	284.94	247.51
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 1 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
B. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Albert Elovitz, Inc. 1812 Penn Ave Pittsburgh, PA 15201	Bush License plates/TPD	as of 6/13/91	33,600.00 In Kind		33,600.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 1 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
C. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
American Meat Institute PO Box 3556 Washington, DC 20007	Dinner entree/TPD	as of 6/13/91	40,000.00 In Kind		40,000.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 1 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
D. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Anheuser-Busch 1776 I St NW Washington, DC 20006	Beer/TPD	as of 6/13/91	700.00 In Kind		700.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 1 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
E. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Bethany Limousine 2401 M St NW Washington, DC 20037	10 Limousines/TPD	as of 6/13/91	10,000.00 In Kind		10,000.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 1 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
F. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Brown-Forman Beverage Co. 11350 McCormick Rd Hunt Valley, MD 21031	Liquor/TPD	as of 6/13/91	216.00 In Kind		216.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 1 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
SUM TOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE			85,048.45	284.94	84,763.51
TOTAL THIS PERIOD (See page 1 for the definition of items to be included and non-Fed share to be included)					
TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (See page 1 for the definition of items to be included)					

5043632913

Page No. _____
 Date _____

NAME OF COMMITTEE

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

A. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE as of	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Caparo, Inc. 1529 14th St NW Washington, DC 20005	FLARE/TPD	6/13/91	1,260.00 In Kind		1,260.00
CATEGORY <input type="checkbox"/> ADMINISTRATIVE/OTDRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE <u>1</u> <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
B. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE as of	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Chamber's Development 10100 Frankstown Rd Pittsburgh, PA 15235	Security underwriting/TPD	6/13/91	20,000.00 In Kind		20,000.00
CATEGORY <input type="checkbox"/> ADMINISTRATIVE/OTDRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE <u>1</u> <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
C. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE as of	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Creative Cakes 2074 Distribution Circle W. or Spring, MD 20930	Cakes for Gift bags/TPD	6/13/91	15,000.00 In Kind		15,000.00
CATEGORY <input type="checkbox"/> ADMINISTRATIVE/OTDRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE <u>1</u> <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
D. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE as of	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Coca-Cola Enterprises 6710 Foxworth Woods Dr Columbia, MD 21046	Soft drinks & mixers/TPD	6/13/91	969.00 In Kind		969.00
CATEGORY <input type="checkbox"/> ADMINISTRATIVE/OTDRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE <u>1</u> <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
E. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE as of	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Decorating Den 1420 Woodmont Ave Bethesda, MD 20814	Fabric & labor for tables/TPD	6/13/91	150,000.00 In Kind		150,000.00
CATEGORY <input type="checkbox"/> ADMINISTRATIVE/OTDRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE <u>1</u> <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
F. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE as of	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
FTD PO Box 2227 Southfield, MI 48037	Candles & greenery for event/TPD	6/13/91	20,000.00 In Kind		20,000.00
CATEGORY <input type="checkbox"/> ADMINISTRATIVE/OTDRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE <u>1</u> <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE			207,229.00		207,229.00
TOTAL THIS PERIOD (this page to not be printed over 2" x 1" and used over 2" x 1")					
TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (used for line 31 of the detailed summary page)					

5043632914

DISBURSEMENT SCHEDULE 1A
(Effective 1/1/91)

JOINT FEDERAL/NON-FEDERAL
ACTIVITY SCHEDULE

Attachment 2
Pg 4 of 6

FOR 1991

NAME OF COMMITTEE

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

A. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE as of	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
FED-COM International Inc 200 N 14th St Arlington, VA 22201	Office machines/TPD	6/13/91	25,203.00 <u>In Kind</u>		125,203.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/NOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 1 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
B. FULL NAME, MAILING ADDRESS & ZIP CODE National-American Wholesale Grocers' Association 201 Park Washington Ct Falls Church, VA 22046	Dinner veg-tables/TPD	6/13/91	23,175.00 <u>In Kind</u>		23,175.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/NOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 1 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
C. FULL NAME, MAILING ADDRESS & ZIP CODE Park Hyatt 24th & M St NW Washington, DC 20037	Hotel Suites/TPD	6/13/91	1,300.00 <u>In Kind</u>		1,300.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/NOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 1 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
D. FULL NAME, MAILING ADDRESS & ZIP CODE Gabbett & Associates 2000 M St NW Washington, DC 20036	Rice for the Dinner/TPD	6/13/91	2,500.00 <u>In Kind</u>		2,500.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/NOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 1 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
E. FULL NAME, MAILING ADDRESS & ZIP CODE Grand Hyatt Washington 1000 H St NW Washington, DC 20001	Hotel Suites/TPD	6/13/91	6,327.00 <u>In Kind</u>		6,327.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/NOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 1 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
F. FULL NAME, MAILING ADDRESS & ZIP CODE Hallmark Cards, Inc 1415 L St NW Washington, DC 20036	Favors for Dinner/TPD	6/13/91	22,000.00 <u>In Kind</u>		22,000.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/NOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 1 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE			180,505.00		180,505.00
TOTAL THIS PERIOD FOR JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE					
TOTAL THIS PERIOD FOR NON-FEDERAL SHARE (used to the 50% of the 50% sharing pool)					

5043632915

NAME OF COMMITTEE

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

A. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Heublein Incorporated 1825 I St NW Washington, DC 20006	Vodka & Tequila/TFD	as of 6/13/91	2,250.00 In Kind		2,250.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 1					
B. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
ID Systems 1413 K St NW Washington, DC 20005	ID Badges/TFD	as of 6/13/91	4,000.00 In Kind		4,000.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 1					
C. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
TPS 29263 Clemons Rd Cleveland, Ohio 44145	Center-pieces/TFD	as of 6/13/91	5,000.00 In Kind		5,000.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 1					
D. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Motorola 5636 3rd St NE Washington, DC 20011	Radios/TFD	as of 6/13/91	6,000.00 In Kind		6,000.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 1					
E. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Pizza Movers 5029 Conn Ave NW Washington, DC 20008	Pizza for volunteers/TFD	as of 6/13/91	500.00 In Kind		500.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 1					
F. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
The Ritz-Carlton Hotel 2100 Mass Ave NW Washington, DC 20008	Hotel Suites/TFD	as of 6/13/91	1,000.00 In Kind		1,000.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 1					
G. TOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE			18,750.00		18,750.00
TOTAL THIS PERIOD (see page 10 and 11 of the 1991-92 summary page)					
TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (see page 11 of the 1991-92 summary page)					

5043632916

DISBURSEMENT SCHEDULE IN
(Effective 1/1/91)JOINT FEDERAL/NON-FEDERAL
ACTIVITY SCHEDULEAttachment 2
Pg 6 of 6

FOR LINE 7

NAME OF COMMITTEE

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

A. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE as of	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Rosen, Inc. PO Box 99 Hanlett, MI 48840	Rosen for centerpieces /TPD	6/13/91	20,000.00 <u>In Kind</u>		20,000.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 1 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
B. FULL NAME, MAILING ADDRESS & ZIP CODE UST 100 West Putnam Ave Greenwich, CT 06830	Wine, glasses & labels /TPD	6/13/91	83,174.00 <u>In Kind</u>		83,174.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 1 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
C. FULL NAME, MAILING ADDRESS & ZIP CODE The Willard Inter-Continental Hotel 1401 PA Ave NW Washington, DC 20004	3 Wote? Suites/TPD	6/13/91	4,600.00 <u>In Kind</u>		4,600.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 1 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
D. FULL NAME, MAILING ADDRESS & ZIP CODE Vichy Springs Mineral Water Corp 2605 Vichy Springs Rd Lkiah, CA 95482	Sparkling water & Brandy/TPD	6/13/91	2,560.00 <u>In Kind</u>		2,560.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 1 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
E. FULL NAME, MAILING ADDRESS & ZIP CODE W A Taylor & Co 587 Kevins Dr Arnold, MD 21012	Maker's Mark Bourbon/TPD	6/13/91	780.00 <u>In Kind</u>		780.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 1 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
F. FULL NAME, MAILING ADDRESS & ZIP CODE Woodward & Lothrop 2800 Eisenhower Ave Alexandria, VA 22314	Furniture/ toiletries/ TPD	6/13/91	7,000.00 <u>In Kind</u>		7,000.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 1 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
SUBTOTAL OF JOINT FEDERAL & NON-FEDERAL ACTIVITY THIS PAGE			118,114.00		118,114.00
TOTAL THIS PERIOD (for page to end the schedule there is 21 and non-fed there is 21 on 11)			2,105,931.00	806,674.73	9,200,206.27
TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (and for the 31 of the detailed summary page)					

5043632917

Attachment 3
pg 1 of 2

SCHEDE A

ISSUED RECEIPTS

Page 18 of 19
Line No. 11C

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

The Chubb Corporation Political EMPLOYER

P.O. Box 1015 Action Committee OCCUPATION:

15 Mountain View Road

Warren, NJ 07062

RECEIPT FOR: N/A

Date

04/23/91

Amount

15,000.00

AGGREGATE YTD: 15,000.00

The Freedom Fund

9701 Floor

1301 McKinney

Houston, TX 77010

RECEIPT FOR: N/A

EMPLOYER

OCCUPATION:

Date

04/24/91

Amount

3,000.00

AGGREGATE YTD: 3,000.00

The Metropolitan Washington
Orthopedic Association, Inc.

6140 Owen Hill Road

Owen Hill, MD 20745

RECEIPT FOR: N/A

EMPLOYER

OCCUPATION:

Date

05/29/91

Amount

7,000.00

AGGREGATE YTD: 7,000.00

The Morgan Companies PAC

66 Wall Street

New York, NY 10005

RECEIPT FOR: N/A

EMPLOYER

OCCUPATION:

Date

04/01/91

Amount

15,000.00

AGGREGATE YTD: 15,000.00

The National Beer Wholesalers
Association

Suite 1000

3304 Leesburg Pike

Falls Church, VA 22041

RECEIPT FOR: N/A

EMPLOYER

OCCUPATION:

Date

05/15/91

Amount

3,000.00

AGGREGATE YTD: 3,000.00

The National Good Government
Vision & Action Fund

1455 Pennsylvania Avenue, NW

Washington, DC 20004

RECEIPT FOR: N/A

EMPLOYER

OCCUPATION:

Date

04/17/91

Amount

3,000.00

AGGREGATE YTD: 3,000.00

The Orthopedic PAC

Suite 100

317 Massachusetts Avenue, NE

Washington, DC 20002

RECEIPT FOR: N/A

EMPLOYER

OCCUPATION:

Date

05/31/91

Amount

3,000.00

AGGREGATE YTD: 3,000.00

SUBTOTAL of Receipts This Page:

49,000.00

5043632918

Attachment 3
pg 2 of 2

SCHEDULE A

2788288 RECEIPTS

Page 14 of 17
Line No.

11C

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

Stone-Pac

150 North Michigan Avenue
Chicago, IL 60601
RECEIPT FOR: N/A

EMPLOYER

OCCUPATION:

Date

05/20/91

Amount

5,000.00

AGGREGATE YTD: 5,000.00

EMPLOYER

OCCUPATION:

Date

Amount

RECEIPT FOR: N/A

AGGREGATE YTD:

TGI Fridays, Inc. Political
Action Committee

P.O. Box 809062
Dallas, TX 75380
RECEIPT FOR: N/A

EMPLOYER

OCCUPATION:

Date

04/09/91

Amount

15,000.00

AGGREGATE YTD: 15,000.00

EMPLOYER

OCCUPATION:

Date

Amount

RECEIPT FOR: N/A

AGGREGATE YTD:

Television & Radio Political
Action Committee

1771 W Street, N.W.
Washington, DC 20036
RECEIPT FOR: N/A

EMPLOYER

OCCUPATION:

Date

06/12/91

Amount

15,000.00

AGGREGATE YTD: 15,000.00

The Bluebonnet Fund PAC

3000 One Shell Plaza
Houston, TX 77002
RECEIPT FOR: N/A

EMPLOYER

OCCUPATION:

Date

04/04/91

Amount

15,000.00

AGGREGATE YTD: 15,000.00

The Carlyle Group PAC

1001 Pennsylvania Avenue, NW
Washington, DC 20004
RECEIPT FOR: N/A

EMPLOYER

OCCUPATION:

Date

06/17/91

Amount

15,000.00

AGGREGATE YTD: 15,000.00

SUBTOTAL of Receipts This Page:

15,000.00 ASD
Inc 5/9/84

Attachment 4
Pg 1 of 7



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20541

BQ-2

Stan Wuckaby, Treasurer
President's Dinner/ACA 1991
Republican Senate - House Dinner
Committee
1101 17th Street, NW, 0808
Washington, D.C. 20036

FEB 7 1992

Identification Number: C00250845

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

Dear Mr. Wuckaby:

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 H4 of your report, pertinent portions attached, discloses numerous transactions in which the non-federal account provides 100% of the goods and services for a shared Federal/Non-Federal fundraising activity. Schedule H3, however, discloses that all transactions for the event "TTP" should reflect the federal account providing at least 38.3% 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

5043632920
1237373399

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)(i)(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 \$1,498,247. 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

12737373320

the Act must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If your committee does not finance non-federal activity, the receipt of the referenced contribution(s) may violate the limitations and prohibitions of the Act. (2 U.S.C. §§441a(f) and 441b) If your committee engages in both federal and non-federal activity, either through a separate non-federal account, or one account that finances activity in connection with both federal and non-federal elections, your committee may be in violation of 11 CFR §102.5(a).

Please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received funds which are not permissible, the Commission recommends that you refund the impermissible amount(s) 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. Should you choose to refund or transfer-out the funds, the Commission will presume the funds were impermissible, absent a statement from your committee to the contrary. 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 prohibited contributions, prompt action by your committee in refunding or transferring-out the amounts will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal

5043632020
12037373391

Attachment 4
Pg 4 of 7

Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Andrew J. Dodson
Senior Reports Analyst
Reports Analysis Division

5 7 4 3 6 3 2 2 2 3
1 2 3 3 7 3 3 2

Attachment 4
Pg 5 of 7

SCHEDULE A

STANDARD RECEIPTS

Page 14 of 17
Line No. 11c

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

Stone-Pac

150 North Michigan Avenue
Chicago, IL 60601
RECEIPT FOR: N/A

EMPLOYER
OCCUPATION:

Date
03/20/91

Amount
\$,000.00

AGGREGATE YTD: \$,000.00

EMPLOYER
OCCUPATION:

Date

Amount

RECEIPT FOR: N/A

AGGREGATE YTD:

TGI Fridays, Inc. Political
Action Committee
P.O. Box 80962
Dallas, TX 75200
RECEIPT FOR: N/A

EMPLOYER
OCCUPATION:

Date
04/03/91

Amount
\$,000.00

AGGREGATE YTD: \$,000.00

EMPLOYER
OCCUPATION:

Date

Amount

RECEIPT FOR: N/A

AGGREGATE YTD:

Television & Radio Political
Action Committee
1772 W Street, N.W.
Washington, DC 20036
RECEIPT FOR: N/A

EMPLOYER
OCCUPATION:

Date
06/12/91

Amount
\$,000.00

AGGREGATE YTD: \$,000.00

The Bluebonnet Fund PAC

EMPLOYER
OCCUPATION:

Date
04/04/91

Amount
\$,000.00

AGGREGATE YTD: \$,000.00

3000 One Shell Plaza
Houston, TX 77002
RECEIPT FOR: N/A

EMPLOYER
OCCUPATION:

Date
06/17/91

Amount
\$,000.00

AGGREGATE YTD: \$,000.00

The Carlyle Group PAC

1001 Pennsylvania Avenue, NW
Washington, DC 20004
RECEIPT FOR: N/A

SUBTOTAL of Receipts This Page:

ASD
LC 5/9/89

SCHEDULE A

FINISHED RECEIPTS

Page 7 of 17
Line No. 11c

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:

2331 Pennsylvania Avenue
Washington, DC 20036

RECEIPT FOR: N/A

Date
05/20/91

Amount
6,000.00

AGGREGATE YTD: 6,000.00

Glennco Distilleries Company
PAC

EMPLOYER

OCCUPATION:

1700 Citizens Plaza
Louisville, KY 40202

RECEIPT FOR: N/A

Date
05/08/91

Amount
3,000.00

AGGREGATE YTD: 3,000.00

Goldman Sachs PAC
Suite 200

EMPLOYER -

OCCUPATION:

1101 Pennsylvania Avenue, N.W.
Washington, DC 20004

RECEIPT FOR: N/A

Date
05/09/91

Amount
15,000.00

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:

Wealth Insurance PAC

EMPLOYER

OCCUPATION:

Suite 1200
1025 Connecticut Avenue, N.W.
Washington, DC 20036

RECEIPT FOR: N/A

Date
05/28/91

Amount
3,000.00

AGGREGATE YTD: 3,000.00

Wells Fargo Financial Services Lt
Suite 3600 LTD. - PAC

EMPLOYER

OCCUPATION:

100 W. La Salle Street
Chicago, IL 60601

RECEIPT FOR: N/A

Date
06/10/91

Amount
15,000.00

AGGREGATE YTD: 15,000.00

SUBTOTAL of Receipts This Page:

Inc 6/24/85

AD

Attachment 4
Pg 9 of 7

SCHUD-2 A

STANDARD RECEIPTS

Page 18 of 19
Line No. 11C

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

The Chubb Corporation Political EMPLOYER

P.O. Box 1615 Action Committee OCCUPATION:

15 Mountain View Road

Warren, NJ 07062

RECEIPT FOR: N/A

Date

04/23/91

Amount

15,000.00

AGGREGATE YTD: 15,000.00

The Freedom Fund

91st Floor

1301 McKinney

Houston, TX 77010

RECEIPT FOR: N/A

EMPLOYER

OCCUPATION:

Date

04/24/91

Amount

3,000.00

AGGREGATE YTD: 3,000.00

The Metropolitan Washington

Orthopedic Association, Inc.

6140 Oxon Hill Road

Oxon Hill, MD 20645

RECEIPT FOR: N/A

EMPLOYER

OCCUPATION:

Date

05/19/91

Amount

7,500.00

AGGREGATE YTD: 7,500.00

The Morgan Companies PAC

60 Wall Street

New York, NY 10006

RECEIPT FOR: N/A

EMPLOYER

OCCUPATION:

Date

04/01/91

Amount

15,000.00

AGGREGATE YTD: 15,000.00

The National Beer Wholesalers

Suite 1600 Association

3144 Leesburg Pike

Falls Church, VA 22041

RECEIPT FOR: N/A

EMPLOYER

OCCUPATION:

Date

05/19/91

Amount

3,000.00

AGGREGATE YTD: 3,000.00

The National Good Government

Vision & Ethics Fund

1455 Pennsylvania Avenue, NW

Washington, DC 20004

RECEIPT FOR: N/A

EMPLOYER

OCCUPATION:

Date

06/17/91

Amount

3,000.00

AGGREGATE YTD: 3,000.00

The Orthopaedic PAC

Suite 100

317 Massachusetts Avenue, NE

Washington, DC 20002

RECEIPT FOR: N/A

EMPLOYER

OCCUPATION:

Date

05/31/91

Amount

3,000.00

AGGREGATE YTD: 3,000.00

SUBTOTAL of Receipts This Page:

49,500.00

Attachment 5



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

RQ-2

February 27, 1992

Stan Huckaby, Treasurer
President's Dinner/ACA 1991
Republican Senate - House Dinner
Committee
1101 17th Street, NW, 0000
Washington, D.C. 20036

Identification Number: C00250045

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

Dear Mr. Huckaby:

This letter is to inform you that as of February 26, 1992, the Commission has not received your response to our request for additional information, dated February 7, 1992. That notice requested information essential to full public disclosure of your federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Andrew Dodson on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

A handwritten signature in cursive script, appearing to read "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

92037410424
5043632927

TELECON

ANALYST: Andrew Dodson
CONVERSATION WITH: Ms Trudy Barksdale , Assistant Treasurer
COMMITTEE: PRESIDENT'S DINNER/AKA 1991 REPUBLICAN
SENATE-HOUSE DINNER COMMITTEE C00250845
DATE: April 6, 1992
SUBJECT(S): RFAI dated 2/7/92

I spoke to Ms Trudy Barksdale today concerning the RFAI referencing the President's Dinner/AKA 1991 republican Senate-House Dinner Committee's 1991 Mid Year report (1/1/91 - 6/30/91). Ms Barksdale stated that a response to the RFAI would be delivered to the Commission on 4/7/92.

5043632928

Gary Vander Jagt
Chairman
National Republican
Congressional Committee

Robert H. Michel
Republican Leader of the House

RECEIVED
FEDERAL ELECTION
COMMISSION
GEORGE BUSH

THE PRESIDENT'S DINNER

Howard H. Baker, Jr.
Dinner Chairman

Bob Dole
Republican Leader of the Senate

March 19, 1992

Attachment 7
pg 1 of 4
LAW OFFICE

Andrew J. Dodson
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: ID #C00241182
Mid-Year Report, 1/1/91 - 6/30/91

Dear Mr. Dodson,

This letter responds to your inquiry about information contained in the Mid-Year Report of The President's Dinner/aka The 1991 Republican Senate-House Dinner Committee.

First, you ask about our reporting of \$609,114 of in-kind contributions, which were listed as in-kind transfers from a non-federal account and attributed to the non-federal share of our fundraising costs. (Corresponding disbursements were itemized to balance the receipt of the in-kind contributions.) Due to the new allocation regulations, we recognized that this is a novel issue. As listed on Schedule H2, the Dinner Committee's overall allocation was 38.3% federal and 61.7% non-federal. In-kind contributions were received by the non-federal account. Thus, it was necessary to adjust upwards the federal share of other Dinner Committee expenses to account for these non-federal receipts in order to maintain the proper allocation ratio.

In practice, you will note that the federal share of expenditures listed on Schedule H4, except for the non-federal in-kind receipts and disbursements, is consistently higher than the non-federal share of payment for those expenses. In fact, we refigured the federal share of expenditures other than the in-kind contributions at approximately 53.9%, so that the overall allocation would match the 38.3% federal/61.7% non-federal requirement. Importantly, the "bottom line" of the Dinner Committee's allocable expenses, totaled on page 37 of Schedule H4, demonstrates the overall allocation ratio was precisely followed by use of this approach. Moreover, in the end, we did not raise 38.3% federal funds, and could have used a lower federal allocation.

(202) 659-1771

(202) 833-2491 (FAX)

1101 17th Street, N.W. ♦ Suite 808 ♦ Washington, D.C. 20036

504363229

Paid for by The President's Dinner Committee. Proceeds will be divided evenly 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 laws on political contributions. Contributions to The President's Dinner are not deductible for federal income tax purposes.

Andrew J. Dodson
Federal Election Commission
March 19, 1992
Page 2

Attachment 7
FEC

Second, you ask why a Schedule H1 was not included with our Mid-Year Report to show allocation of administrative and generic voter drive costs. The Dinner Committee does not engage in any activity for which a Schedule H1 is necessary. We operate only for purposes of fundraising, and allocate all of our costs accordingly (the "funds received" method for allocation). Treating all of these expenses as fundraising expenses has been sanctioned by the Commission in A.O. 1992-2.

Third, you note a discrepancy in the Dinner Committee's reporting of total itemized contributions from individuals. The figure of \$1,498,247 for line 11(a)(i) is correct, and we are amending our Schedule A's for that line, and the Detailed Summary Page, accordingly.

Next, you identify three contributions as appearing to be from corporate sources, or as from organizations that are not registered political committees. The contribution from Heitman Financial Services, Ltd. was actually deposited in the Dinner Committee's non-federal account, but was mistakenly reported as having been received by the federal account. The Carlyle Group is, in fact, a partnership, and the contribution from its partners was listed, properly, on Schedule A, line 11(a)(i). The contribution was incorrectly listed, also, on Schedule A, line 11(c). Regarding the contribution from the Metropolitan Washington Orthopedic Association, we inquired about the corporate nature of their sources, and were misinformed by the spokesperson. We have now transferred the funds to our non-federal account, and in accordance with the Commission's directive, we have informed the contributors of this transfer and offered to refund the contribution. All appropriate amendments will be filed with respect to these contributions.

If you have any additional questions, please feel free to contact us.

Sincerely,

Trudy Matthes Barksdale
Trudy Matthes Barksdale
Assistant Treasurer

Enclosures

5043632970

Guy Vander Jagt
Chairman
National Republican
Congressional Committee

Robert H. Michel
Republican Leader of the House

GEORGE BUS

THE PRESIDENT'S DINNER

Howard H. Baker, Jr.
Dinner Chairman

Attachment 7
1 of 3 of 4

Republican Leader of the Senate

HAND DELIVERED

March 13, 1992

The Metropolitan Washington
Orthopedic Association
6144 Oxon Hill Road
Oxon Hill, Maryland 20745

Dear Sir or Madame,

Please be advised that on May 29, 1991, the 1991 President's Dinner received and deposited your contribution to The President's Dinner/aka 1991 Republican Senate-House Dinner Committee, in the amount of \$7,500, to The President's Dinner federal account. Prior to depositing the contribution, the staff of The President's Dinner contacted your office, and was under the impression that The Metropolitan Washington Orthopedic Association was a sole proprietorship. On receiving a request from the Federal Election Commission for clarification of the status of your organization, we contacted your office again, and were advised that your association is, indeed, incorporated.

In order to comply with Federal Election Law, the 1991 President's Dinner Committee has transferred your contribution of \$7,500 to the committee's non-federal account. A copy of the transfer check is enclosed.

Please be advised that you are entitled to a refund of your contribution, if you do not wish it to remain in the 1991 President's Dinner non-federal account. We will be contacting you by phone to follow up on this matter.

Please contact Chris Ward, or me, with any further questions at (202) 659-1771. Thank you very much for your assistance and continued support of The President's Dinner.

Sincerely,

Trudy Matthes Barksdale
Trudy Matthes Barksdale
Assistant Treasurer

Enclosure

(202) 659-1771 (202) (833)-2491 (FAX)
1101 17th Street, N.W. ♦ Suite 808 ♦ Washington, D.C. 20036

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

Copy 1003
(No Carbon Paper Required)

For Along Perfection

RECEIVED
FEDERAL BUREAU OF INVESTIGATION
REPORTS AND EXHIBITS

THE PRESIDENT'S DINNER

1101 17TH ST. NW. SUITE 808

WASHINGTON, DC 20036

202-659-1771

92 APR -9 PM 12:12

3149

March 13, 19 92

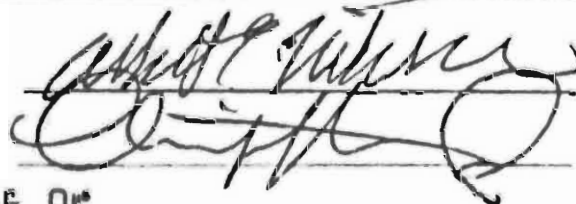
15-126
540 DOI

PAY TO THE ORDER OF The President's Dinner Trust 1991 and Building Fund \$ 7,500.00

Seven thousand five hundred dollars and 00/100 ----- DOLLARS

SOVRAN BANK

Sovran Bank/DC National Washington, DC 20006



⑈003149⑈ ⑆054001204⑆ 200116 0⑈

THE PRESIDENT'S DINNER

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

DELUXE - FORM DYCIP-3 V-2

DATE	DESCRIPTION	AMOUNT
3/13/92	transfer to Trust 1991 of 5/19/91 contribution from The Metropolitan Washington Orthopedic Association	7,500.00



2 5 6 2 8 9 8 4 0 5

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

FEDERAL ELECTION COMMISSION MAR 2 9 44 AM '95
999 E Street, N.W.
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD Referral # 92L-15
Date Activated: June 1, 1994
Staff Member: Karen V. Johnson
Eric S. Brown

SOURCE: INTERNALLY GENERATED

RESPONDENTS: President's Dinner/AKA 1991 Republican
Senate-House Dinner Committee and
Stan Huckaby, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 441b(a)
11 C.F.R. § 106.5(f) & (g)
11 C.F.R. § 106.1(e)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the President's Dinner/AKA 1991 Republican Senate-House Dinner Committee ("the Committee") and Stan Huckaby, as treasurer, (collectively "Respondents") to the Office of the General Counsel for accepting in-kind corporate contributions relating to a shared fundraising activity during 1991. The Committee also was referred for accepting two prohibited corporate contributions during 1991.

II. FACTUAL AND LEGAL ANALYSIS

A. Applicable Law

1. Payment of Federal Share of In-kind Contributions

Commission regulations effective on January 1, 1991 provide for the allocation of expenses by party committees making disbursements for administrative expenses, fundraising activities,

5043632733

exempt activities, or generic voter drives in connection with both Federal and non-federal elections. 11 C.F.R. § 106.1(e). More specifically, party committees that make disbursements in connection with Federal and non-federal elections shall allocate expenses for the direct costs of a fundraising program or event, including disbursements for solicitation of funds and for planning and administration of actual fundraising events, where Federal and non-federal funds are collected by one committee through such a program or event. 11 C.F.R. §§ 106.5(a)(2)(i) and (ii).

5 0 4 3 6 3 2 9 3 4
Fundraising costs must be allocated on the basis of the particular event or program. A party committee, whether national or not, allocates the direct costs of each fundraising program or event, where both Federal and non-federal funds are collected by that one committee through such program or event. 11 C.F.R. § 106.5(f). A party committee should allocate its fundraising costs based on the ratio of funds received into its Federal account to its total receipts from each fundraising program or event. Each event or program has its own ratio and the committee estimates this ratio before each program or event, based on the committee's reasonable prediction of its Federal and non-federal revenue for the program or event. 11 C.F.R. § 106.5(f)(1). The committee adjusts its ratio no later than 60 days following each such event to reflect the actual ratio of funds received. If either the Federal or non-federal account has paid more than its share, then the necessary transfers will be made and noted in the report for the period in which they are made. 11 C.F.R. § 106.5(f)(2).

5043632938

The purpose of these allocation rules is to prevent non-federal funds from paying for the Federal share of a mixed expense. See 55 Fed. Reg. at 26066. Committees have the option of two payment procedures: (1) paying an entire bill from the Federal account and transferring funds from the non-federal to the Federal account to cover the non-federal share; or (2) establishing a separate allocation account, which the Commission considers to be a Federal account, and transferring funds from the Federal account and the non-federal account solely to make allocable payments. 11 C.F.R. §§ 106.5(g)(1)(i) and (ii).

These allocation regulations, however, do not distinguish between direct and in-kind donations received in connection with allocable activities or functions. On October 14, 1992, the Commission issued Advisory Opinion 1992-33,¹ and addressed the issue of in-kind contributions. The Commission concluded that "a national party committee may accept corporate in-kind donations in connection with fundraising activities only if one of two conditions is met: (1) the amount of the Federal share of goods or services is paid to the non-federal account in advance or on receipt; or (2) sufficient funds to pay for the Federal share of goods or services have been transferred to a non-federal account in advance."

Concerning the second condition, "the committee must, in essence, prepay or escrow an amount of funds that corresponds to

1. This opinion was issued at the request of the General Counsels of the Democratic National Committee and the Republican national Committee by their letter dated August 13, 1992.

the value of the Federal share of the expenses associated with" the in-kind contributions. Additionally, the Commission provided in AO 1992-33 as follows:

The committee must make good faith estimates of the amount of such in-kind donations that are expected and transfer a sufficient amount of funds from the committee's Federal account to a non-federal account to cover the Federal share of the expenses associated with the in-kind donations actually received. The committee may make bulk transfers to accomplish this "escrow" function, rather than separate transfers for each anticipated in-kind donation. By allowing this approach, the Commission is relieving the committees of the practical problem of having to calculate and pay the precise amount of the Federal share of expenses associated with in-kind donations on the same day such donations are received. This escrow of funds is separate and distinct from the allocation account described above and set out at 11 C.F.R. § 106.5(g)(1)(ii).

AO 1992-33 at pages 4-5.

2. Prohibited Corporate Contributions

Under the Federal Election Campaign Act of 1971, as amended (the "Act"), corporations are prohibited from making contributions or expenditures from their general treasury funds in connection with any election of any candidate for Federal office. 2 U.S.C. § 441b. It is also unlawful "for any candidate, political committee, or other person knowingly to accept or receive" any contribution prohibited by 2 U.S.C. § 441b. Id. With respect to corporations, a contribution or expenditure is defined as "any direct or indirect payment, distribution, loan, advance, deposit, or gift of money or any services, or anything of value ... to any candidate, campaign committee or political party or organization, in connection with any" Federal election. 2 U.S.C. § 441b(b)(2).

B. Analysis

1. Payment of Federal Share of In-Kind Contributions

5043632937

The President's Dinner/AKA 1991 Republican Senate-House Dinner Committee (the "Committee") is identified on its Statement of Organization as a joint fundraising committee of the National Republican Congressional Committee (NRCC) and the National Republican Senatorial Committee (NRSC). On Schedule H3 of the Committee's 1991 Mid-Year Report, the Committee discloses an in-kind "transfer-in" of \$609,114 from The President's Dinner Trust-1991 and Building Fund (the Committee's non-federal account) for shared fundraising costs. See Attachment A at page 5. The date of the "transfer-in" is June 13, 1991, the actual date of the 1991 President's Dinner fundraising event, and the date, on or about which, the in-kind contributions of goods and services were received by the Committee. The Committee listed, on Schedule H4, the names of each of the twenty-nine corporate vendors who made in-kind donations on June 13, 1991, and the value of each in-kind donation. See Attachment A at pages 6-10. The in-kind donations were allocated 100% to the non-federal account for a shared fundraising activity (The President Dinner, or "TPD") on Schedule H4.²

RAD sent a Request for Additional Information ("RFAI") noting that the Committee received an in-kind transfer of \$609,114, from its non-federal account, and subsequently disclosed

2. The Date column of each one of these disbursements reads "as of 6/13/91" and the various purposes include "dinner/entree," "10 Limousines," "fabric & labor for tables," "candles & greenery for event," "dinner vegetables," etc.

numerous payments for allocable fundraising costs which were provided solely by the non-federal account. The RFAI explained that these transactions may have resulted in the federal account's receipt of corporate contributions because the federal account failed to pay its share of the value of the in-kind donations to the non-federal account.

5043632938
The Committee's response stated that the in-kind contributions were originally received by the Committee's non-federal account and used for an allocable joint fundraising event. As a result, the non-federal account provided 100% of various allocable expenses and the Committee felt it was necessary to "adjust upwards" the federal share of other Committee expenses to account for its allocable share of these in-kind contributions, and maintain a proper allocation ratio. The Committee stated that it refigured the federal share of expenditures other than the in-kind contributions at approximately 53.9%, so that the overall allocation would match the 38.3%/61.7% non-federal requirement." Attachment A at page 22. See 11 C.F.R. § 106.5(f).

According to the RAD Analyst, the Committee adjusted the overall allocation as stated. By the last day covered by the Committee's 1991 Mid-Year Report (June 30, 1991), the Committee had achieved a 38.3% federal/61.7% non-federal allocation of costs for this event through the non-federal account's under-allocation and the Federal account's over-allocation of all other event expenses. The Committee adjusted its allocation between the Federal and non-federal accounts and employed the higher federal percentage (53.9%) for allocating other event expenses (even those

other expenses paid for before June 13, 1991).

5043632239
The question presented is not whether the federal account paid for its fair share of allocable expenses, but rather whether it did so in accordance with regulatory or other guidance existing in June, 1991, the first year that the allocation regulations were effective. As previously noted, regulatory provisions concerning the payment of allocable expenses by party committees with separate federal and non-federal accounts are found at 11 C.F.R. § 106.5(g). Two payment methods are provided: (1) payment of joint expenses by the federal account, involving transfers from the non-federal account to the federal account, 11 C.F.R. § 106.5(g)(i), and; (2) payment by a separate allocation account, involving transfers from federal and non-federal accounts to the separate allocation account "solely to make allocable payments", 11 C.F.R. § 106.5(g)(ii)(emphasis added).

Hence, in the absence of additional guidance, a national party committee could accept corporate in-kind donations in connection with joint fundraising activities if it made a transfer from the federal to a non-federal account in the exact amount of the federal share of each in-kind donation on the same day the in-kind donation was received. The Commission later issued AO 1992-33 and provided that:

[A] national party committee may accept corporate in-kind donations in connection with fundraising activities, but only if one of two conditions is met: (1) the amount of the Federal share of goods or services is paid to the non-federal account in advance or on receipt; or (2) sufficient funds to pay for the Federal share of goods or services have been transferred to a non-federal account in advance.

AO 1992-33 at page 4.

There is no question that the Committee failed to make a transfer from the federal to a non-federal account in the exact amount of the federal share of each of the twenty-nine in-kind donations at issue on the same day they were received (on or about June 13, 1991). Nevertheless, by June 30, 1991, the Committee had achieved the 38.3% federal/61.7% non-federal allocation of costs for this event by under-allocating the cost to the non-federal account and over-allocating the cost to the federal account of other expenses related to the joint fundraising event.

In light of the foregoing, this Office recommends that the Commission 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. § 441b(a) and 11 C.F.R. § 106.5 by accepting prohibited corporate in-kind contributions. This Office also recommends, however, that the Commission take no further action against the Committee for the following reasons.

First, the Committee was attempting to comply with complex regulations which were recently enacted. Second, although the federal account should have transferred 38.3% of \$609,114 (\$233,290.66) to the Committee's non-federal account by June 13, 1991, it did achieve this same result seventeen days later. Finally, the delay does not appear to have resulted from an inability to pay, because the federal account appears to have had

5043632240

sufficient funds on hand to make the transfer on June 13, 1991.³

For all of these reasons, this Office recommends that, in the proper ordering of its priorities and resources, Heckler v. Chaney, 470 U.S. 821 (1985), the Commission take no further action and instead include in the notification letter an admonishment informing the Committee that allocation of in-kind contributions must conform to the methodology set forth in AO 1992-33.

2. Prohibited Corporate Contributions

The Committee's 1991 Mid-Year Report disclosed a \$7,500 contribution from the Metropolitan Washington Orthopedic Association PAC, identified by RAD as an unregistered organization, on May 29, 1991, and a \$12,000 contribution from The Carlyle Group PAC, identified by RAD as a corporation, on June 17, 1991. On February 7, 1992, RAD sent an RFAI to the Committee questioning the permissibility of the funds received from the two organizations.

A. Metropolitan Washington Orthopedic Association

The Committee responded to the RFAI, informing RAD that the \$7,500 received from the Metropolitan Washington Orthopedic Association PAC (the "Association") was transferred to the President's Dinner's non-federal account on March 13, 1992. Trudy Matthes Barksdale, the assistant treasurer, explained in a letter

3. The 1991 Mid-year Report shows total federal receipts of \$2,385,589.60 and total federal disbursements of \$2,377,134.71. Included in the federal disbursements is \$1,563,000.00 in proceeds which were transferred out to the intended beneficiaries of the fundraiser, the NRCC and the NRSC. In fact, \$272,000.00 was transferred out to the NRSC on June 18, 1991. The remaining \$822,589.60, was used to pay the federal share of the joint fundraising expenses, including the in-kind contributions.

5043632941

accompanying a copy of the transfer-out check that she was originally misinformed by the Association regarding the source of these funds.

Given the limited amount involved in the refunded Metropolitan Washington Orthopedic Association PAC contribution, this Office recommends that the Commission 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. § 441b(a), by accepting a prohibited corporate contribution from the Metropolitan Washington Orthopedic Association, but take no further action. This Office will include in the notification letter an admonishment informing the Committee that acceptance of corporate contributions is a violation of 2 U.S.C. § 441b(a).

B. The Carlyle Group

The Committee also addressed the \$12,000 contribution from The Carlyle Group, stating that, "The Carlyle Group is, in fact, a partnership, and the contribution from its partners was listed, properly, on Schedule A, line 11(a)(i)." The contribution was listed, also, on Schedule A, line 11(c), as a partnership contribution. The Committee has not refunded or transferred-out the \$12,000 amount.

The contribution was questioned because the Committee's PAC receipt schedule disclosed a contribution from the Carlyle Group PAC, which was found by RAD to be not registered as a PAC, but to

5043632242

be registered as a corporation in the District of Columbia. (An unincorporated partnership is also registered.) On the same report, on the Committee's receipt schedules for contributions from individuals, a \$12,000 contribution received on June 10, 1991 from The Carlyle Group (identified on the schedule as a partnership) appears. These two entries on the Committee's receipt schedules appear to refer to the same contribution.⁵

5043632943
The RAD Referral states that information provided by the District of Columbia Corporate Division indicates that The Carlyle Group was registered as a corporation in the District of Columbia on May 9, 1988. However, the Corporate Registration Division of the Department of Consumer and Regulatory Affairs of the District of Columbia also has a general partnership registered under the name, "The Carlyle Group," qualified in the District of Columbia on April 6, 1988 and established in Delaware as a general limited partnership under the name "The Carlyle Group, L.P." with an establishment date of April 30, 1987. The Dun & Bradstreet, Million Dollar Directory indicates that The Carlyle Group Limited Partnership is a subsidiary of the Carlyle Holding Corporation. The similarity in name and relationship between the two entities probably accounts for the discrepancy in information concerning the The Carlyle Group.

In light of the above, this Office recommends the Commission

5. The contribution is attributed \$6,000 each to two individuals identified as partners, Stephen L. Norris and Daniel A. D'Aniello. This Office notes that the reported attribution to two partners (\$6,000 each) would not be in excess of the limitations on contributions from persons at 2 U.S.C. § 441a, because of the Committee's status as a joint-fundraiser.

find no 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. § 441b(a) by accepting a prohibited corporate contribution from The Carlyle Group.

IV. RECOMMENDATIONS

1. Open a MUR.
2. 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. § 441b(a) and 11 C.F.R. § 106.5, by accepting prohibited corporate in-kind contributions, but take no further action.
3. 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. § 441b(a) by accepting a prohibited corporate contribution from the Metropolitan Washington Orthopedic Association, but take no further action.
4. Find no 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. § 441b(a) with regard to the contribution from The Carlyle Group.
5. Approve the appropriate letters.
6. Close the file.

Lawrence M. Noble
General Counsel

Date

3/1/95

BY:



Lois G. Lerner
Associate General Counsel

Attachments:

- A. Referral Materials

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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

)
)
) RAD Referral
) #92L-15
)
)

MUR 4190

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 7, 1995, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral #92L-15:

1. Open a MUR.
2. 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. § 441b(a) and 11 C.F.R. § 106.5, by accepting prohibited corporate in-kind contributions, but take no further action.
3. 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. § 441b(a) by accepting a prohibited corporate contribution from the Metropolitan Washington Orthopedic Association, but take no further action.

(continued)

5043632945

Federal Election Commission
Certification for RAD Referral
#92L-15
March 7, 1995

Page 2

4. Find no 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. § 441b(a) with regard to the contribution from The Carlyle Group.
5. Approve the appropriate letters, as recommended in the General Counsel's Report dated March 1, 1995.
6. Close the file.

Commissioners Aikens, Elliott, McDonald, McGarry, and Thomas voted affirmatively for the decision; Commissioner Potter recused himself from this matter and did not cast a vote.

Attest:

3-7-95
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Thurs., Mar. 02, 1995 9:44 a.m.
Circulated to the Commission: Thurs., Mar. 02, 1995 4:00 p.m.
Deadline for vote: Tues., Mar. 07, 1995 4:00 p.m.

bjr

5043632946



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 14, 1995

Stan Huckaby, Treasurer
President's Dinner/AKA 1991
Republican Senate - House
Dinner Committee
1101 17th Street, N.W., #808
Washington, D.C. 20036

RE: MUR 4190

Dear Mr. Huckaby:

On March 7, 1995, the Federal Election Commission found reason to believe that the President's Dinner/AKA 1991 Republican Senate-House Dinner Committee and you, as treasurer, violated 2 U.S.C. § 441b(a) by accepting corporate contributions. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file. Additionally, the Commission found no reason to believe that the President's Dinner/AKA 1991 Republican Senate-House Dinner Committee and you, as treasurer, violated 2 U.S.C. § 441b(a) with regard to a contribution from The Carlyle Group.

The Commission reminds you your federal account must pay its fair share of allocable expenses in accordance with Commission regulations at 11 C.F.R. § 106.5. The Commission also reminds you that accepting corporate contributions is a violation of 2 U.S.C. § 441b(a). You should take steps to ensure that this activity does not occur in the future.

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.

5043632947

Stan Huckaby
Page 2

If you have any questions, please contact Karen V. Johnson,
the attorney assigned to this matter, at (202) 219-3690.

Sincerely,



Lee Ann Elliott
Vice Chairman

Enclosure
First General Counsel's Report

50436322948



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 490

DATE FILMED 4/4/95 CAMERA NO. 1

CAMERAMAN SES

5943632249