



FEDERAL ELECTION COMMISSION

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

March 22, 1977

Mr. John Bumgarner
2145 East 27th Street
Tulsa, Oklahoma

Re: MUR 275 (76)

Dear Mr. Bumgarner:

This letter is to inform you that the Federal Election Commission has decided to close its files on the above-referenced matter relating to your complaint concerning the Inhoffe for Congress Committee.

We are attaching hereto copies of the Commission's determination and General Counsel's Report on this matter. If you have any further questions, please call David Spiegel the attorney assigned to this matter (telephone no. 202/382-4055).

Sincerely yours,

William Oldaker
General Counsel

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL





FEDERAL ELECTION COMMISSION

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

MAR 22 1977

Mr. Russell D. Robinson
Treasurer
Inhoffe for Congress Committee
4606 E. 67th Street
Tulsa, Oklahoma 74136

Re: MUR 275 (76)

Dear Mr. Robinson:

This letter is to acknowledge receipt of your correspondence of February 8, 1977, submitting amendments to your Reports of Receipts and Expenditures. The Federal Election Commission has decided to close its files in this matter. We are attaching hereto copies of the Commission's determination and the General Counsel's Report on this matter.

Sincerely yours,

15

William Oldaker
General Counsel

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



3/11/77

MEMORANDUM

TO: MUR 275 FILE

FROM: KIM ROSENFELD *KR*

On March 11, 1977, the Committee response and amendments to the disclosure reports which were received by the FEC on February 11, 1977, were transferred to the Reports Analysis Section for transmittal to the House of Representatives. The MUR was determined closed by the Commission on March 10; accordingly, these amendments shall become part of the public record.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

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MISSION

MUR 275 (76)

MUR 275 (76)

tion

Accordingly, the file in this matter has been closed.

Marjorie W. Emmons
Secretary to the Commission

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JAN 10 1967
U.S. DEPARTMENT OF AGRICULTURE
WASHINGTON, D.C.

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With respect to the claim involving alleged failure to report expenses for a cocktail party held on Inhofe's behalf in a private residence during the "summer of 1976" and the claim alleging a failure to report certain costs incurred by Senator Carl Curtis in conjunction with the two July 8 fundraisers, the Commission authorized the staff to gather further information.

As noted herein, it is now staff's recommendation that the four remaining allegations be closed.

II. Evidence

The allegations made by the complainant were predicated on a facial reading of the reports, as well as newspaper articles and advertisements which described the aforementioned events.

In separate letters, dated November 18, 1976 and February 11, 1977, the Treasurer of the Inhofe Committee responded to the allegations.

A summary of the evidence pertinent to each of the four allegations is as follows:

1. Curtis Airfare: The October 10th Report filed by the Inhofe for Congress Committee lists a \$200 expenditure to Senator Curtis for "outside services" on September 17,

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1976. The Committee's response to an FEC inquiry verifies that this payment covered the expenses of Curtis's roundtrip airfare from Washington, D.C., to Tulsa, Oklahoma.

2. Private Party: The cocktail party was held at a private home and the expenses incurred amounted to \$278.65, which was for beverages. The Committee is not required to report as an expenditure the use of personal property, and the cost of invitations, food and beverages voluntarily provided at an individual's residence, if the cumulative value of the activities does not exceed \$500 with respect to any election. 2 U.S.C. §431f(4) (D).

3 & 4. July 8 Fundraisers: The Committee stated that expenses were incurred with respect to the July 8th fundraisers and that these expenses were reported. The response explained that "for convenience sake, expenditures for the cocktail reception were reported under the name of Ben Voth." The Committee's response included a copy of a receipted bill in the name of Ben Voth, in the amount of \$806.57. The October 10, 1976 Quarterly Report shows an expenditure of \$806.57 to Mr. Ben Voth. In addition, the 10-Day Pre-Primary Election Report of Receipts and Expenditures shows several expenditures relating to the bean dinner fundraiser held on July 8th.

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The Committee also indicated in their November 18th response to Commission inquiries that the receipts from these fundraisers were included in the total receipts for the period. On February 11, 1977, the Committee amended their 10-Day Pre-Primary Election Report to include Schedule D's, which show \$7,850.00 received from ticket sales to a July 8, 1976 cocktail party, and \$1,756.50 received from ticket sales to a July 8, 1976 bean dinner.

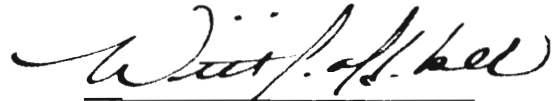
The Committee also filed an amendment to the 10-Day Preceding the General Election Report, with a Schedule D showing \$9,343.58 received from ticket sales to a luncheon held on October 4, 1976.

III. Analysis

As the preceding summary of evidence indicates, respondent has attempted to disclose each of the expenditures and receipts alluded to by the complainant. In the case of the July 8th fundraisers, the reports were incomplete in that they lacked Schedule D's. Upon notice, however, the Committee has corrected the omission. Additionally the Committee has corrected a similar omission not noted by the complainant, which occurred with respect to an October 4, 1976 fundraiser.

IV. Recommendations

Conclude that no action should be taken against respondent, close the file and send the attached letters.



WILLIAM OLDAKER
GENERAL COUNSEL

DATE:

3/7 /77

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FEDERAL ELECTION COMMISSION

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

Mr. John Bumgarner
2145 East 27th Street
Tulsa, Oklahoma

Re: MUR 275 (76)

Dear Mr. Bumgarner:

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We are attaching hereto copies of the Commission's determination and General Counsel's Report on this matter. If you have any further questions, please call David Spiegel the attorney assigned to this matter (telephone no. 202/382-4055).

Sincerely yours,

William Oldaker
General Counsel

RECEIVED
FEB 17 1977
GENERAL COUNSEL





FEDERAL ELECTION COMMISSION

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

Mr. Russell D. Robinson
Treasurer
Inhoffe for Congress Committee
4606 E. 67th Street
Tulsa, Oklahoma 74136

Re: MUR 275 (76)

Dear Mr. Robinson:

This letter is to acknowledge receipt of your correspondence of February 8, 1977, submitting amendments to your Reports of Receipts and Expenditures. The Federal Election Commission has decided to close its files in this matter. We are attaching hereto copies of the Commission's determination and the General Counsel's Report on this matter.

Sincerely yours,

William Oldaker
General Counsel

RECEIVED
FEB 10 1977
FEDERAL ELECTION COMMISSION



INHOFE FOR CONGRESS COMMITTEE
4606 East 67th Street
Tulsa, Oklahoma 74136

February 8, 1977

RECEIVED
FEDERAL ELECTION
COMMISSION

77 FEB 11 PM 3:42

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David Spiegel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

770486

Re: Mur 275 (76)

Dear Mr. Spiegel:

At the request of Mr. William C. Oldaker, we have enclosed amended reports for the Ten Day Report Preceding the Primary Election and the Ten Day Report Preceding the General Election, to include the fundraising activities held during the campaign.

The receipts from the events were included in total receipts on the original report but due to a misunderstanding, we did not include a Schedule D with the reports.

As I stated in my November 18, 1976 letter, I called the Federal Election Commission on two occasions and requested how we should report the receipts on the fundraising activities. We were told to treat them as any other contribution.

We regret any confusion and time this matter has caused and hope that these amended reports will properly disclose the requirements of the law.

If any other information is needed, please let me know.

Yours very truly,

Russell D. Robinson

Russell D. Robinson

RDR:dh
Enclosures

OFFICE OF GENERAL COUNSEL

Report of Receipts and Expenditures
for a Candidate or Committee
Supporting any Candidate(s) for
Nomination or Election to Federal Office

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Candidate or Committee (in full) <input type="checkbox"/> Check if name or address is changed Inhofe for Congress Committee		2 Identification Number 05695
(b) Address (number and street) 4606 East 67th Street		3(a) Is this a report of receipts and expenditures for only one election? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(c) City, State and ZIP code Tulsa, Oklahoma 74136		(b) If "Yes," for which election? Primary on 8-24-76 (general, primary, runoff) (date)
4 Type of Report (Check appropriate box and complete, if applicable)		
(a) <input checked="" type="checkbox"/> Amendment For II (Which report)		(e) <input type="checkbox"/> January 31 Year End Report
(b) <input type="checkbox"/> April 10 Quarterly Report		(f) <input type="checkbox"/> Monthly Report _____ (Month)
(c) <input type="checkbox"/> July 10 Quarterly Report		(g) <input type="checkbox"/> Termination Report
(d) <input type="checkbox"/> October 10 Quarterly Report		
(h) <input checked="" type="checkbox"/> Tenth day report preceding Primary election on 8-24-76 in the State of Oklahoma (primary, general or convention) (date)		
(i) <input type="checkbox"/> Thirtieth day report following _____ election on _____ in the State of _____ (primary, general or convention) (date)		

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From **7-1-76** Through **8-10-76**

Section A - Cash Balance Summary	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 19 76		\$ -
7 Cash on hand at beginning of reporting period	\$ 12,150.64	
8 Total receipts (from line 19)	\$ 12,200.28	\$ 32,075.28
(a) Subtotal (Add lines 7 and 8)	\$ 24,350.92	\$ 32,075.28
9 Total expenditures (From line 25)	\$ 18,534.59	\$ 26,258.95
10 Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ 5,816.33	\$ 5,816.33
11 Contributed items on hand to be liquidated (attach itemized list) \$		
Section B - Presidential Campaign Expenditures Subject to Limitation - Summary (To Be Used Only By Presidential Candidates Receiving Federal Funds)		
12 Operating expenditures (from line 20)	\$	\$
13 Refunds and Rebates (from line 17)	\$	\$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b) Expenditures from prior years subject to limitation		\$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)		\$

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

Russell D. Robinson, Treasurer

(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

February 8, 1977

(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g or § 441j (See reverse side of form)

For further
information
Contact:



Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

Detailed Summary Schedule of Receipts and Expenditures

(Page 2)

Name of Candidate or Committee Inhofe for Congress Committee		REPORT COVERING THE PERIOD FROM: 7-1-76 TO: 8-10-76	
		Column A This Period	Column B Calendar year-to-date
PART I - RECEIPTS			
15 Contributions and other Income:			
(a) Itemized (use Schedule A)		\$ 10,353.67	
(b) Unitemized		\$ 1,846.61	
(c) Sales and Collections Included Above: List by event on memo Schedule D (\$9,606.50)			
(d) Subtotal of contributions and other income		\$ 12,200.28	\$ 32,075.28
16 Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments received		\$	\$
17 Refunds, Rebates, Returns Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of refunds, rebates, returns		\$	\$
18 Transfers In:			
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)		\$	
(b) From other Committees (Itemize on Schedule A Regardless of Amount)		\$	
(c) Subtotal of transfers in		\$	\$
19 Total Receipts		\$ 12,200.28	\$ 32,075.28
PART II - EXPENDITURES			
20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):			
(a) Itemized (use Schedule B)		\$ 17,819.99	
(b) Unitemized		\$ 714.60	
(c) Subtotal of operating expenditures		\$ 18,534.59	\$ 26,258.95
21 Independent Expenditures (use Schedule E)		\$	\$
22 Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments made and contribution refunds		\$	\$
23 For Use Only By Presidential Campaigns Receiving Federal Funds; Exempt Fundraising, Legal and Accounting Expenditures:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of fundraising expenditures		\$	\$
24 Transfers Out:			
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)		\$	
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)		\$	
(c) Subtotal of transfers out		\$	\$
25 Total Expenditures		\$ 18,534.59	\$ 26,258.95
PART III - DEBTS AND OBLIGATIONS			
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)		\$	
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)		\$	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
28 Total Receipts (from line 19)		\$	
29 Transfers In (from line 18(a))		\$	
30 Net Receipts (Subtract line 29 from line 28)		\$	
31 Total Expenditures (from line 25)		\$	
32 Transfers out (from line 24(a))		\$	
33 Net Expenditures (Subtract line 32 from line 31)		\$	

Schedule B

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see Instructions on back)

Page 2 of 3 forLINE NUMBER 20 (A)

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

Inhofe for Congress Committee

Full Name, mailing address and ZIP code

Martin Barbecue Pit
1410 N. Sheridan
Tulsa, Oklahoma

Purpose of Expenditure

Bean Dinner
Expenditure for
Fundraising event
held on 7-8-76

Date (month,
day, year)
7-9-76

Amount of each expendi-
ture this period
1,040.00

Full Name, mailing address and ZIP code

Dutsch's Party Barn
Route 1, Box 886
Broken Arrow, Okla. 74012

Purpose of Expenditure

Bean Dinner
Expenditure for
Fundraising event
held 7-8-76

Date (month,
day, year)
7-9-76

Amount of each expendi-
ture this period
150.00

Full Name, mailing address and ZIP code

Art Finklestein
Thirteen Third Street
Rye, New York 10580

Purpose of Expenditure

Survey

Date (month,
day, year)
7-9-76

Amount of each expendi-
ture this period
1,250.00

Full Name, mailing address and ZIP code

Vernon Potts Sound
1176 N. Union Place
Tulsa, Oklahoma 74127

Purpose of Expenditure

Rental of Sound
Equipment for Bean
Dinner on 7-8-76

Date (month,
day, year)
7-13-76

Amount of each expendi-
ture this period
185.00

Full Name, mailing address and ZIP code

General Building Company
Tulsa, Oklahoma

Purpose of Expenditure

Rent 7-14/8-13
Key Deposit \$2.00
Cleaning Dep. \$25.00

Date (month,
day, year)
7-14-76

Amount of each expendi-
ture this period
157.00

Full Name, mailing address and ZIP code

Tulsa County Republican Committee
1722 South Boston
Tulsa, Oklahoma 74119

Purpose of Expenditure

Voter Registration
Information

Date (month,
day, year)
7-15-76

Amount of each expendi-
ture this period
200.00

Full Name, mailing address and ZIP code

Robert W. Kasten
House of Representatives
Washington, D.C. 20515

Purpose of Expenditure

Travel

Date (month,
day, year)
8-3-76

Amount of each expendi-
ture this period
300.00

Full Name, mailing address and ZIP code

Metro Systems Inc.
P. O. Box 4697
Tulsa, Oklahoma 74104

Purpose of Expenditure

Computer Time

Date (month,
day, year)
8-6-76

Amount of each expendi-
ture this period
137.15

Subtotal of expenditures this page (optional) ▶

\$

Total this period (last page this line number only) ▶

\$ 3,419.15

Schedule B

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures

Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see Instructions on back)

Page 3 of 3 forLINE NUMBER 20 (A)

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

Inhofe for Congress Committee

Full Name, mailing address and ZIP code

Vic Clark
Pawnee, Oklahoma

Purpose of Expenditure

Bean Dinner
Expenditure for
Fundraising event
held on 7-8-76

Date (month,
day, year)

7-28-76

Amount of each expenditure this period

\$200.00

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expenditure this period

Subtotal of expenditures this page (optional). ▶

\$ 200.00

Total this period (last page this line number only). ▶

\$17,819.99

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Receipts, Sales and Collections For Line Number 15C Only of FEC Form 3

Page 1 of 1 for
LINE NUMBER 15C

(see instructions on back)

Inhofe for Congress Committee

1	Sale of tickets (List by event below)*	\$	9,606.50
2	Mass collections (List by event below)**	\$	
3	Sale of Items	\$	
4	Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3)	\$	9,606.50

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	Amount from Sale of Tickets this Period*	Amount from Mass Collections this Period**
Southern Hills Country Club, 61st & S.		\$	\$
Lewis, Tulsa, Oklahoma; Cocktail Reception honoring United States Senator Carl T. Curtis	7-8-76	7,850.00	
Dutsch's Recreation Center, 8825 East 91st Tulsa, Oklahoma; Bean Dinner with U.S. Senator Carl Curtis appearing for Jim Inhofe	7-8-76	1,756.50	
Subtotal this period this page (optional)		\$	\$
Total this period (last page this line number only)		\$9,606.50	**

Report of Receipts and Expenditure
for a Candidate or Committee
Supporting any Candidate(s) for
Nomination or Election to Federal Office

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Candidate or Committee (in full) <input type="checkbox"/> Check if name or address is changed INHOFE FOR CONGRESS COMMITTEE		2 Identification Number 056596
(b) Address (number and street) 4606 East 67th Street		3(a) Is this a report of receipts and expenditures for only one election? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
(c) City, State and ZIP code Tulsa, Oklahoma 74136		(b) If "Yes," for which election? _____ on _____ (date) (general, primary, runoff)
4 Type of Report (Check appropriate box and complete, if applicable)		
(a) <input checked="" type="checkbox"/> Amendment For <u>II (h)</u> (Which report) (c) <input type="checkbox"/> July 10 Quarterly Report (d) <input type="checkbox"/> October 10 Quarterly Report		
(b) <input type="checkbox"/> April 10 Quarterly Report (e) <input type="checkbox"/> January 31 Year End Report (f) <input type="checkbox"/> Monthly Report (Month)		
(g) <input type="checkbox"/> Termination Report		
(h) <input checked="" type="checkbox"/> Tenth day report preceding <u>General</u> election on <u>11-2-76</u> in the State of <u>Oklahoma</u> (primary, general or convention) (date)		
(i) <input type="checkbox"/> Thirtieth day report following _____ election on _____ in the State of _____ (primary, general or convention) (date)		

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From 10-1-76 Through 10-18-76

Section A - Cash Balance Summary	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 1976		\$ -0-
7 Cash on hand at beginning of reporting period	\$ 28,248.24	
8 Total receipts (from line 19)	\$ 38,416.05	\$ 123,273.14
(a) Subtotal (Add lines 7 and 8)	\$ 66,664.29	\$ 123,273.14
9 Total expenditures (From line 25)	\$ 42,362.87	\$ 98,971.72
10 Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ 24,301.42	\$ 24,301.42
11 Contributed items on hand to be liquidated (attach itemized list)	\$	
Section B - Presidential Campaign Expenditures Subject to Limitation - Summary (To Be Used Only By Presidential Candidates Receiving Federal Funds)		
12 Operating expenditures (from line 20)	\$	\$
13 Refunds and Rebates (from line 17)	\$	\$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b) Expenditures from prior years subject to limitation	\$	\$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)	\$	\$

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

Russell D. Robinson, Treasurer

(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

February 8, 1977

(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g or § 441j (See reverse side of form)

For further
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Contact:

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1325 K Street, N.W.
Washington, D.C. 20463

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Detailed Summary Schedule of Receipts and Expenditures
(Page 2)

Name of Candidate or Committee Inhofe for Congress Committee		REPORT COVERING THE PERIOD FROM: 10-1-76 TO: 10-18-76	
		Column A This Period	Column B Calendar year-to-date
PART I - RECEIPTS			
15 Contributions and other Income:			
(a) Itemized (use Schedule A)		\$ 26,068.82	
(b) Unitemized		\$ 12,347.23	
(c) Sales and Collections Included Above: List by event on memo Schedule D (\$ 9,343.58)			
(d) Subtotal of contributions and other income		\$ 38,416.05	\$ 123,273.14
16 Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments received		\$	\$
17 Refunds, Rebates, Returns Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of refunds, rebates, returns		\$	\$
18 Transfers In:			
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)		\$	
(b) From other Committees (Itemize on Schedule A Regardless of Amount)		\$	
(c) Subtotal of transfers in		\$	\$
19 Total Receipts		\$ 38,416.05	\$ 123,273.14
PART II - EXPENDITURES			
20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):			
(a) Itemized (use Schedule B)		\$ 42,036.79	
(b) Unitemized		\$ 326.08	
(c) Subtotal of operating expenditures		\$	\$ 98,971.72
21 Independent Expenditures (use Schedule E)		\$ 42,362.87	\$ 98,971.72
22 Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments made and contribution refunds		\$	\$
23 For Use Only By Presidential Campaigns Receiving Federal Funds; Exempt Fundraising, Legal and Accounting Expenditures:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of fundraising expenditures		\$	\$
24 Transfers Out:			
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)		\$	
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)		\$	
(c) Subtotal of transfers out		\$	\$
25 Total Expenditures		\$ 42,362.87	\$ 98,971.72
PART III - DEBTS AND OBLIGATIONS			
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)		\$	
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)		\$	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
28 Total Receipts (from line 19)		\$	
29 Transfers In (from line 18(a))		\$	
30 Net Receipts (Subtract line 29 from line 28)		\$	
31 Total Expenditures (from line 25)		\$	
32 Transfers out (from line 24(a))		\$	
33 Net Expenditures (Subtract line 32 from line 31)		\$	

Schedule B

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see Instructions on back)

Page 2 of 3 for

LINE NUMBER 20 (a)

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

Inhofe for Congress Committee

Full Name, mailing address and ZIP code

Fred N. Davis & Associates
Suite 700
5800 East Skelly Drive
Tulsa, Oklahoma 74135

Purpose of Expenditure

Advertising and
television time
Radio spots

Date (month,
day, year)

10-6-76

Amount of each expend
ture this period

9,000.00

10-15-76

5,576.00

Full Name, mailing address and ZIP code

Metro Systems, Inc.
P. O. Box 4697
Tulsa, Oklahoma 74104

Purpose of Expenditure

Computer run of
precinct by house-
hold
Computer time

Date (month,
day, year)

10-7-76

Amount of each expend
ture this period

544.56

10-7-76

826.00

Full Name, mailing address and ZIP code

Dan P. Holmes
2531 East 31st
Tulsa, Oklahoma

Purpose of Expenditure

Reimbursement for
contribution over
limit

Date (month,
day, year)

10-7-76

Amount of each expend
ture this period

100.00

Full Name, mailing address and ZIP code

I.B.M.
700 1st National Center East
Oklahoma City, Oklahoma 73102

Purpose of Expenditure

Typewriter ribbons
Typewriter rental

Date (month,
day, year)

10-5-76

Amount of each expend
ture this period

19.04

10-7-76

187.20

Full Name, mailing address and ZIP code

Canteen Company of Oklahoma
6520 East Skelly Drive
Tulsa, Oklahoma 74145

Purpose of Expenditure

Food & service for
luncheon at Assembly
Center held 10-4-76

Date (month,
day, year)

10-7-76

Amount of each expend
ture this period

2,106.00

Full Name, mailing address and ZIP code

A.B. Dick Products Co. of Tulsa
601 E. Fourth Street
Tulsa, Oklahoma 74103

Purpose of Expenditure

Machine maintenance
Office supplies
Office supplies
Office supplies

Date (month,
day, year)

10-4-76

Amount of each expend
ture this period

27.75

10-7-76

34.53

10-13-76

129.17

10-15-76

37.96

Full Name, mailing address and ZIP code

Cogman & Associates
111 N.W. Twenty-third Street
Oklahoma City, Oklahoma 73103

Purpose of Expenditure

Balance due on
primary victory
squad

Date (month,
day, year)

10-15-76

Amount of each expend
ture this period

250.00

Full Name, mailing address and ZIP code

Public Service Co. of Oklahoma
Box 94000
Tulsa, Oklahoma 74194

Purpose of Expenditure

Electric service
Electric service

Date (month,
day, year)

10-4-76

Amount of each expend
ture this period

75.25

10-11-76

74.82

Subtotal of expenditures this page (optional) ▶

\$ 18,986.28

Total this period (last page this line number only) ▶

\$

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Page 1 of 1 for
LINE NUMBER 15C

Name of Candidate or Committee in full

Inhofe for Congress Committee

Total Proceeds during the Reporting Period:

1 Sale of tickets (List by event below) \$9,343.58

2 Mass collections (List by event below) ** \$

3 Sale of Items \$ _____

4 Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3)..... \$ 9,343.58

List of Sales and Collections by Event

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	Amount from Sale of Tickets this Period*	Amount from Mass Collections this Period**
Assembly Center, 100 Civic Center, Tulsa		\$	\$
Oklahoma; Luncheon with Ronald Reagan			
appearing for Jim Inhofe	10-4-76	\$9,343.58	
Subtotal this period this page (optional)		\$	\$
Total this period (last page this line number only)		\$9,343.58	**

Chron file



FEDERAL ELECTION COMMISSION

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

JAN 31 1977

Mr. Russell D. Robinson
Treasurer
Inhofe for Congress Committee
4606 East 67th Street
Tulsa, Oklahoma 74136

Re: MUR 275 (76)

Dear Mr. Robinson:

We have received your letter of November 18, 1976, in response to our inquiries into alleged violations of the Federal Election Campaign Act; however, we still require certain additional information.

Your reports dealing with the fundraising event on July 8, 1976 fail to disclose fully the fundraising events held on that date. In addition, further analysis of the reports you have filed with the Commission indicates that fundraisers may have been held on other dates, and also may have been reported incorrectly. We would appreciate it if you would disclose all fundraising events in amendments to your reports, including the gross proceeds, dates, and locations of the events. This information is required by §434(b)(6) of Title 2 of the United States Code.

This information should be reported on separate pages in the Reports of Receipts and Expenditures, using Schedule D forms. The total receipts should be entered as a memo entry on line 15(c) of the Detailed Summary Schedule. In addition, any receipts over \$100 must be itemized on a separate Schedule A and included in the total of itemized receipts on line 15(a) of the Detailed Summary Schedule. Receipts of less than \$100 must be included in the total of unitemized receipts on line 15(b) of the summary page.

RECEIVED
FEDERAL ELECTION COMMISSION
JAN 31 1977
U.S. DEPARTMENT OF JUSTICE

In addition, expenditures made for the purpose of a fundraising event should be clearly identified as such on the Report. Section 432(d) of Title 2 of the United States Code, and §102.9 of the Commission's proposed regulations require that the "particulars" of itemized expenditures must be reported.

In order that this matter may be expedited, please send the required Amended Reports within ten (10) days of receipt of this letter, to the **Federal Election Commission**, 1325 K Street, N.W., Washington, D.C. 20463, to the attention of David Spiegel.

If you have any further questions, please contact Mr. Spiegel at 202-382-4055.

Sincerely yours,

/s/

William C. Oldaker
General Counsel

7704021731

UP/

OFFICE OF GENERAL COUNSEL

File

1 NOV 1976

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Russell D. Robinson
Treasurer
Inhofe for Congress Committee
4606 East 67th Street
Tulsa, OK 74136

Re: MUR 275 (76)

Dear Mr. Robinson:

This letter is to notify you that the Federal Election Commission has received a complaint against you which alleges certain violations of the Federal Election Campaign Act of 1971, as amended (the Act). We have numbered this matter MUR 275 (76). A copy of the complaint is enclosed. The Commission has reason to believe that the matters alleged therein state a violation of 2 U.S.C. §434(b)(6) for failure to report the total proceeds from two fundraising events held on July 8, 1976, and §434(b)(9) for failure to report expenditures in connection with the cocktail reception held at the Southern Hills Country Club on July 8, 1976.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Specifically, please address the following issues:

- (1) Whether the Committee incurred expenditures in connection with the July 8, 1976 cocktail reception.
- (2) Whether the use of the Southern Hills Country Club facilities for the aforementioned event was donated by the owners thereof.
- (3) Whether the payment to Senator Carl Curtis for "outside services" which was reported in the October 10 Report covered the expenses for his appearances on behalf of Mr. Inhofe on July 8, 1976.

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OFFICE OF GENERAL COUNSEL

77040024732

- (4) The circumstances surrounding a private cocktail reception in support of Mr. Inhofe's candidacy held at the home of John Rooney in the Summer of 1976, with particular emphasis on the expenses in connection therewith.

Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. You will be sent copies of summaries of all correspondence received by the Commission from the complainant concerning this matter. If you have any questions, please contact Sherry Swirsky (telephone no. 202/382-1406), the staff member assigned to this case.

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

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

Signed: John G. Murphy, Jr.

John G. Murphy, Jr.
General Counsel

Enclosure

SSwirsky:pjg:10/20/76
cc: Chron file
MUR file
SS

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

77040024733

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

1. The following service is requested (check one).

☐ Show to whom and date delivered..... 15¢

☒ Show to whom, date, & address of delivery.. 35¢

☐ RESTRICTED DELIVERY.
Show to whom and date delivered..... 65¢

☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:

Russell Robinson

3. ARTICLE DESCRIPTION:

REGISTERED NO. CERTIFIED NO. INSURED NO.

438105

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

Diane Luffines

4. DATE OF DELIVERY POSTMARK

11-9-76

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

1 NOV 1976

Mr. John Bunker, Jr.
2145 East 27th Street
Tulsa, OK

Re: MUR 275 (76)

Dear Mr. Bunker:

We have completed a preliminary review of your complaint and have numbered it as MUR 275 (76). Please refer to this number in any further correspondence.

With regard to your allegations numbered 3 through 6, the Commission is of the view that the Inhofe for Congress committee has complied with the requirements of the Federal Election Campaign Act. There is insufficient information in your complaint relating to allegation number 2 to furnish reason to believe that any violations of the Act have been committed. The Commission has found reason to believe that the Inhofe for Congress Committee violated 2 U.S.C. §434(b)(6) by failing to report the total ticket sales for its reception and dinner on July 8, 1976.

A copy of your complaint has been forwarded to respondent. If you have any further evidence you wish to make available to us, please submit it within five days of your receipt of this letter.

Please note that 2 U.S.C. §437g(a)(3) enjoins any person from making public the fact of "any notification or investigation by the Commission until the respondent agrees in writing to make public the investigation.

The staff member assigned to this matter is Sherry Swirsky (telephone no. 202/382-1406). Please do not hesitate to write or call if you have any further questions.

Sincerely yours,

Signed: John G. Murphy, Jr.

John G. Murphy, Jr.
General Counsel

SSwirsky:pjg:10/20/76
cc: Chron file
MUR file & SS

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

77040024735

77040011733

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.		
1. The following service is requested (check one).		
<input type="checkbox"/> Show to whom and date delivered..... 15¢		
<input checked="" type="checkbox"/> Show to whom, date, & address of delivery.. 35¢		
<input type="checkbox"/> RESTRICTED DELIVERY. Show to whom and date delivered..... 65¢		
<input type="checkbox"/> RESTRICTED DELIVERY. Show to whom, date, and address of delivery 85¢		
2. ARTICLE ADDRESSED TO:		
<i>John Bumgarner</i>		
3. ARTICLE DESCRIPTION:		
REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>438106</i>	
(Always obtain signature of addressee or agent)		
I have received the article described above.		
SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent		
<i>John Bumgarner</i>		
4. DATE OF DELIVERY		POSTMARK
<i>11-5-76</i>		<i>NOV 5 1976</i>
5. ADDRESS (Complete only if requested)		
<i>2145 E. 27th</i>		
6. UNABLE TO DELIVER BECAUSE:		
CLERK'S INITIALS		

FEDERAL ELECTION COMMISSION

1. Memo to Oldaker from Eumans - 10/29/76
2. Work Product of Committee Reports - 12/76

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

- | | |
|--|---|
| <input type="checkbox"/> (1) Classified Information | <input type="checkbox"/> (6) Personal privacy |
| <input type="checkbox"/> (2) Internal rules and practices | <input type="checkbox"/> (7) Investigatory files |
| <input type="checkbox"/> (3) Exempted by other statute | <input type="checkbox"/> (8) Banking Information |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input type="checkbox"/> (5) Internal Documents | |

Signed

Kurt Buhlert

date

9/28/77

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Jim Inhofe)

MUR 275 (76)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on October 29, 1976, the Commission adopted the recommendation of the General Counsel to find reason to believe that violations of 2 U.S.C. §434(b)(6) and §434(b)(9) had been committed in the above-captioned matter.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

RECEIVED THE COM
OFFICE OF GENERAL COUNSEL

770400:4731

DATE AND TIME OF TRANSMITTAL: 10-28-76
10:00 am

NO. MUR 275 (76)
REC'D: 10/12/76

FEDERAL ELECTION COMMISSION
Washington, D. C.

Complainant's Name: John Bumgarner, Jr. (notarized)

Respondent's Name: Jim Inhofe

Relevant Statute: 2 U.S.C. §§431, 434, 441b.

Internal Reports Checked: All reports filed by candidate and committee

Federal Agencies Checked: None

SUMMARY OF ALLEGATION

- 1) A private fundraiser to support Jim Inhofe's congressional campaign was held at a country club on July 8, 1976, the total proceeds and expenses of which were not reported, in apparent violation of 2 U.S.C. §434(b)(6) and (9).
- 2) Senator Carl Curtis appeared at two July 8 fundraisers on behalf of Inhofe, but his expenses were not reported by Inhofe or his principal campaign committee, in possible violation of 2 U.S.C. §434(b)(9).

PRELIMINARY LEGAL ANALYSIS

(See continuation sheet)

1) The complaint alleges that a private fundraiser at a country club was held on behalf of Mr. Inhofe on July 8, 1976. The amended Ten-Day Report of the Inhofe for Congress Committee reflects a number of \$125. Contributions concentrated in the period from July 7 through July 9. (According to the invitation to the fundraiser which was enclosed with the complaint, \$125 was the minimum contribution for the event). The report does not, however,

(See continuation sheet)

RECOMMENDATION

Find reason to believe with respect to allegations #'s 1 and 3; send attached letters.

Date of Next Commission Review: _____

CONTINUATION SHEET

SUMMARY OF ALLEGATIONS

(3) A dinner in support of Jim Inhofe was held on July 8, 1976, the total receipts for which were not reported as required by 2 U.S.C. §434(b)(6).

(4) The expenses for a reception for Inhofe which was held at a private residence were not reported, in possible violation of 2 U.S.C. §434(b)(9).

(5) Inhofe and an aide attended a seminar on political organization in Wisconsin; their total expenses were not reported, in possible violation of 2 U.S.C. §434(b)(9).

(6) Shortly before announcing his candidacy, Inhofe traveled to Washington, D.C. on a trip that was political in nature; the expenses therefor were not reported by the candidate or his committee.

(7) Mr. Inhofe made one subsequent "political" trip to Washington, D.C. and did not report the expenses he incurred.

(8) The candidate conducted a pre-primary election yard sign campaign for which neither he or his committee has reported expenses.

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CONTINUATION SHEET

PRELIMINARY LEGAL ANALYSIS

indicate that this event was held nor does it reflect the total amount of proceeds from the ticket sales. There is therefore reason to believe that the Commission has committed a violation of 2 U.S.C. §434(b)(6), which requires that such items be reported.

Furthermore, the Committee reports do not reflect any expenditures for this event. If such expenditures exceed \$100, the failure of the Committee to report them may constitute a violation of 2 U.S.C. §434(b)(9). If the use of the country club facilities was donated to the Committee and the country club is operated as a corporation, this may constitute a prohibited corporate contribution in violation of §441b of the Act.

2) According to evidence provided by the complainant, Senator Carl Curtis appeared at two fundraisers on behalf of Jim Inhofe on July 8, 1976. The October 10 Report filed by the Inhofe for Congress Committee lists a \$200 expenditure to Senator Curtis for "outside services" on September 17, 1976. Assuming that this expenditure relates to the Senator's appearances on behalf of Inhofe in early July, it would appear that the Committee has complied with the reporting requirement of 2 U.S.C. §434(b)(9).

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PRELIMINARY LEGAL ANALYSIS

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FEDERAL BUREAU OF INVESTIGATION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

CONTINUATION SHEET

PRELIMINARY LEGAL ANALYSIS

4) The complaint alleges that sometime in the summer of 1976, a private cocktail party in support of Inhofe's candidacy was held at the home of John Rooney in Tulsa. The Committee did not report the expenses for this function. However, the Committee is not required to report as an expenditure "the use of real or personal property and the cost of invitations, food, and beverages, voluntarily provided by an individual to a candidate in rendering personal services on the individual's residential premises for candidate-related activities if the cumulative value of such activities by such individual . . . do not exceed \$500 with respect to any election." 2 U.S.C. §431(f)(4)(D). The Committee should be requested to explain the circumstances surrounding this event so that it can be determined whether §431(f)(4)(D) is applicable.

5) The candidate and an aide attended a seminar on political organization in Milwaukee, Wisconsin at about the time that Inhofe declared his candidacy. The Committee's April 10 Report indicates the aide's expenditures for that trip and the July 10 Report indicates payment to the Bank Americard Corp. for the Milwaukee seminar. These reports appear to satisfy the reporting requirement of §434(b)(9).

COMMISSION ON CONSTITUTIONAL
COMMITTEE FILE 6-7
OFFICE OF GENERAL COUNSEL

CONTINUATION SHEET

PRELIMINARY LEGAL ANALYSIS

774001
6) The complaint alleges that Inhofe traveled to Washington, D.C. in early 1976 on a trip that was political in nature. The complaint is the only available evidence of this trip which is not reflected on reports filed by the candidate or his committee. In light of the insufficiency of the evidence relating to this allegation, there is no reason to believe that a violation has occurred.

7) The complaint alleges that Inhofe made one subsequent "political" trip to Washington, D.C. which he did not report as an expenditure. The Committee's July 10 Report does indicate expenditures for a Washington seminar on June 24, 1976.

774001
8) The final allegation relates to a pre-primary election yard sign campaign for which no expenses were reported. If the expenditures for these signs were less than \$100, they would not be reportable under §434(b)(9) of the Act. Furthermore, even if the expenses did exceed \$100, the Thirty Day Report filed by the Committee indicates substantial expenditures for advertising prior to the primary, which may include the yard sign campaign expenses.

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OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Russell D. Robinson
Treasurer
Inhofe for Congress Committee
4606 East 67th Street
Tulsa, OK 74136

Re: MUR 275 (76)

Dear Mr. Robinson:

770410:11743
This letter is to notify you that the Federal Election Commission has received a complaint against you which alleges certain violations of the Federal Election Campaign Act of 1971, as amended (the Act). We have numbered this matter MUR 275 (76). A copy of the complaint is enclosed. The Commission has reason to believe that the matters alleged therein state a violation of 2 U.S.C. §434(b)(6) for failure to report the total proceeds from two fundraising events held on July 8, 1976, and §434(b)(9) for failure to report expenditures in connection with the cocktail reception held at the Southern Hills Country Club on July 8, 1976.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Specifically, please address the following issues:

- (1) Whether the Committee incurred expenses in connection with the July 8, 1976 cocktail reception.
- (2) Whether the use of the Southern Hills Country Club facilities for the aforementioned event was donated by the owners thereof.
- (3) Whether the payment to Senator Carl Curtis for "outside services" which was reported in the October 10 Report covered the expenses for his appearances on behalf of Mr. Inhofe on July 8, 1976.



FEDERAL ELECTION COMMISSION
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OFFICE OF GENERAL COUNSEL

- (4) The circumstances surrounding a private cocktail reception in support of Mr. Inhofe's candidacy held at the home of John Rooney in the summer of 1976, with particular emphasis on the expenses in connection therewith.

Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. You will be sent copies or summaries of all correspondence received by the Commission from the complainant concerning this matter. If you have any questions, please contact Sherry Swirsky (telephone no. 202/382-1406), the staff member assigned to this case.

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

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

John G. Murphy, Jr.
General Counsel

Enclosure

77041001174
OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Bumgarner, Jr.
2145 East 27th Street
Tulsa, OK

Re: MUR 275 (76)

Dear Mr. Bumgarner:

We have completed a preliminary review of your complaint and have numbered it as MUR 275 (76). Please refer to this number in any further correspondence.

With regard to your allegations numbered 3 through 6, the Commission is of the view that the Inhofe for Congress committee has complied with the requirements of the Federal Election Campaign Act. There is insufficient information in your complaint relating to allegation number 2 to furnish reason to believe that any violations of the Act have been committed. The Commission has found reason to believe that the Inhofe for Congress Committee violated 2 U.S.C. §434(b)(6) by failing to report the total ticket sales for its reception and dinner on July 8, 1976.

A copy of your complaint has been forwarded to respondent. If you have any further evidence you wish to make available to us, please submit it within five days of your receipt of this letter.

Please note that 2 U.S.C. §437g(a)(3) enjoins any person from making public the fact of "any notification or investigation" by the Commission until the respondent agrees in writing to make public the investigation.

The staff member assigned to this matter is Sherry Swirsky (telephone no. 202/382-1406). Please do not hesitate to write or call if you have any further questions.

Sincerely yours,

John G. Murphy, Jr.
General Counsel



The Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

762822

Dear Sir:

A review of the personal reports filed by Jim Inhofe, candidate for Congress, First District of Oklahoma, and the reports of the Inhofe for Congress Committee suggests that serious violations of the reporting requirements of the Federal Election Campaign Act have been made. I request that the reports be audited immediately.

I believe that the following are gross omissions and should be questioned:

1. On July 8, 1976, a private cocktail reception in support of Jim Inhofe's Congressional candidacy was held at the Southern Hills Country Club, Tulsa, Oklahoma. The purpose of this function was to raise money for the Jim Inhofe campaign. The guest of honor was Senator Carl Curtis. The requested amount for attendance was \$125.00 minimum and \$1000.00 maximum. (see Exhibits A, B, and E).

This event is not mentioned anywhere in any campaign finance reports filed by Mr. Inhofe personally, or in those reports filed by his Committee. The failure to report the expenses of this private cocktail reception, and to reveal who paid for it, appears to be a violation of 2 USC 434. A review of these same reports reveals that Mr. Inhofe's committee did report expenses of a public Bean Dinner honoring Mr. Curtis which occurred the same evening (see Exhibit C). Neither event was handled according to the accounting procedures for sales of tickets outlined in 2 USC 434, and the expenses of Mr. Curtis's visit are unreported.

2. Sometime in the summer of 1976, a private cocktail reception in support of Jim Inhofe's Congressional candidacy was held at the home of John Rooney, Tulsa, Oklahoma. The purpose of this function was to raise money for the Jim Inhofe campaign. This event is not mentioned anywhere in any campaign reports filed by Mr. Inhofe personally, or in those reports filed by his committee. The failure to report the expenses of this private cocktail reception, and to reveal who paid for it, appears to be a violation of 2 USC 434.

3. In early 1976, Candidate Jim Inhofe made a trip to Milwaukee, Wisconsin, to attend a seminar on political organization. The week-long training session was conducted by Congressman Robert Kasten (see also Exhibit D, Tulsa Tribune, August 25, 1976). Candidate Inhofe was accompanied by an aide, Ed Hendrix (Inhofe speech, LaFortune Park, Summer, 1976). It is not known whether they were transported by private or commercial airlines. While a portion of Mr. Hendrix's expenses are reported, Mr. Inhofe's expenses on this trip are not mentioned anywhere in any campaign reports filed by Mr. Inhofe personally, or in those reports filed by his committee. The failure to report the full expenses of Mr. Hendrix and Mr. Inhofe, and to reveal who paid them, appears to be a violation of 2 USC 434.

4. Shortly before announcing his candidacy in early February, 1976, Jim Inhofe travelled to Washington, D. C. The purpose of this trip was political in nature. He addressed the American Conservative Union, whose endorsement he has since received, and he is known to have met with the Committee for Survival of a Free Congress, which thereafter, contributed money to his Congressional candidacy. The expenses of this trip are not mentioned anywhere.

77040001741

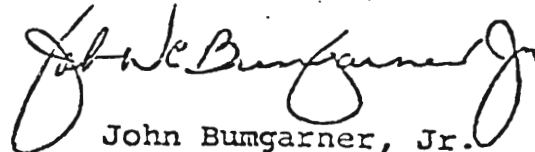
in any campaign reports filed by Mr. Inhofe personally, or in those reports filed by his committee. The failure to report these expenses, and to reveal who paid them, appears to be a violation of 2 USC 434.

5. Mr. Inhofe is known to have made at least one subsequent trip to Washington, D. C. Thereafter it was announced that several individuals from Washington, D. C., had joined his Tulsa campaign staff, and substantial contributions originating in Washington, D. C., appear on his committee's campaign reports. These facts suggest that the purpose of this trip was political in nature. The expenses of this trip are not mentioned anywhere in any campaign reports filed by Mr. Inhofe, or his committee.

6. Several weeks before the August 24, 1976, primary election, a substantial yard sign campaign was launched by Candidate Inhofe. The expense of the wood used in the construction and erection of these signs is not mentioned anywhere in any campaign report filed by Mr. Inhofe, or his committee. The failure to report this expense and to reveal who paid it appears to be a violation of 2 USC 434(b).

It appears that these items, on their face, violated the Federal Election Campaign Act, and I am reporting them in accordance with the provisions of 2 USC 437(g) as revised by the Federal Election Campaign Act Amendments of 1976.

Sincerely yours,



John Bumgarner, Jr.
2145 East 27th Street
Tulsa, Oklahoma

Subscribed and sworn to (affirmed) before me this 11th

day of October, 19 76



NOTARY

My commission expires

March 19, 1979.

EXHIBIT "A"

BEN VOTH

2001 NATIONAL BANK OF TULSA BLDG.

TULSA, OKLAHOMA 74103

PHONE (918) 583-0636

Dear Mr. ~~Blair~~

June 25, 1976

Enclosed is your invitation to a reception at Southern Hills Country Club Thursday, July 8, 1976 honoring Carl T. Curtis, United States Senator from Nebraska who is appearing on behalf of Senator Jim Inhofe, Republican candidate for the First Congressional District. Senator Curtis is the ranking minority member of the Senate Finance Committee which has jurisdiction over taxes, social security, medicare, tariffs and trade. These are vital to all of us. He is also the Chairman of the Republican Conference of United States Senate. Senator Curtis is leading the effort to repeal O.S.H.A.


It is our firm conviction that Jim Jones should and can be replaced as our Representative in Congress. In addition to his anti-business voting record, there are many who question his integrity and honesty. Senator Jim Inhofe's honesty and integrity are unquestionable.

As for the primary, and despite the fact that Jim Inhofe and Frank Keating are friends, there is a political difference between them. Republicans want a winner in November and recent polling has shown that Jim Inhofe is the only candidate who can beat Jones. Jim Inhofe stands for things that you and I believe in.

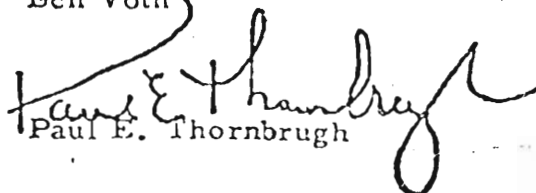
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B.B. Blair

Sincerely,


Ben Voth


Glade Kirpatrick


Paul E. Thornbrugh

R.S.V.P. June 28, 1976

A copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington D.C.

EXHIBIT "B"

PLACE
STAMP
HERE

BEN VOTH
2001 NBT, Bldg.
Tulsa, Oklahoma 74103

EXHIBIT "E"

INHOFE FINANCE COMMITTEE

Gerald M. Bauer
Franklin E. Bernsen
Walter Biery
Ted C. Bodley
Glade Kirkpatrick
Dr. Dan E. Brannin
Walter Bryce
Victor M. Holmes
Charles C. Killin
J. A. LaFortune, Jr.
John L. Livingston, Jr.

INHOFE FINANCE COMMITTEE

Bert McElroy
Joseph R. McGraw
Mrs. A. G. Oliphant
Donald E. Pray
Dr. Frank Sommer
John W. Sublett
Dr. C. T. Thompson
Robert J. Thompson
Paul Thornbrugh
Ben Voth
T. D. Williamson, Jr.

COCKTAIL RECEPTION

Honoring
United States Senator Carl T. Curtis, Nebraska
State Senator James Inhofe,
Candidate
United States Congress
Thursday, July 8, 1976

\$ 125.00 minimum
\$1000.00 maximum
Admits two

5-7 p.m.

OFFICE OF GENERAL COUNSEL

JULY, 1976

Paid Political Announcement

OLD FASHIONED BEAN DINNER

with

U.S. SENATOR CARL CURTIS

appearing for

JIM INHOFE

Republican for Congress

7:00 P.M.

Thursday, July 8

Dutsch's Recreation Center

8825 E. 91st (On 91st East of Memorial)

\$5 Per Person \$12 Per Family

Tickets Available at the Door

or call

Inhofe for Congress Headquarters 743-4486

Paid by Inhofe for Congress Committee, Bart McElroy, Ch.
Russell Robinson, Treas., Box 2517, Tulsa, Ok. 74101

OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

770400:475

2 sides to GOP battle in 1st Dist.

By PEARL WITTKOPP

In the GOP it was a battle of the old and the young, the conservative and the moderate liberal, the organizer and the talker.

And the first, James Inhofe, beat the second Frank Keating.

The third entry in the 1st Dist. Republican race for Congress—Mary Warner—wasn't even a factor.

Inhofe, 41-year-old insurance executive, says the Kasten Plan—the quota system of buttonholing voters he took with blessing from U.S. Rep. Bob Kasten of Wisconsin won him the election and will give him a victory over Rep. James R. Jones in November.

KEATING, 32-YEAR-OLD attorney, said Tuesday night Inhofe won because he had name recognition from the 1974 governor's race, is the father figure of the GOP in Tulsa and is the spokesman for the conservatives.

Keating's closest supporters say privately Inhofe's organization did not win him the primary election. A few are willing to bet money it and anything else Inhofe does before Nov. 2 will not beat Jones in the general election.

Inhofe spent a week learning the Kasten Plan from its organizer, four months on the telephone recruiting 300 persons to be precinct chairmen.

Others spent months compiling voting data on every voter in the district and from that determining how many votes Inhofe needed in each precinct to win the primary election and the gen-

If the Kasten plan worked, there could be no runoff. Inhofe's unofficial vote tally of 17,703 kept him out of a runoff with either Keating, who got 6,820, or Mrs. Warner, who wound up with 2,050.

"WE HAD 300 winners here tonight," Inhofe said at his watch party at the Quality Inn Motel at 51st Street and Harvard Avenue.

"Only one didn't win and I think there was some mistake," he said.

While both Keating and Inhofe raised about \$24,000 for their campaigns, Inhofe said he spent half as much on advertising as his opponent "to demonstrate the Kasten Plan can do it with people."

He disregards suggestions from the Keating camp that it was his super-conservative image that got him the

"The charge isn't true. Frank and I never discussed the issues and no one was aware our ideologies differed. It's not my personality or the advertising. It is the system," Inhofe said.

FOR THE FIRST time in a long time, Keating was not joking or smiling Tuesday night. He said, however, he has no remorse, no regrets, and may run again in two years. He said he will keep a promise to his family and quit the state Senate when his term expires in two years.

Keating has been running for the office for a long time. He thought about dropping out in the spring when Inhofe, with a 4-1 advantage because of name recognition, said he was running.

Keating felt Inhofe double-crossed him, claiming Inhofe had promised he would not enter the race and endanger splitting the party. He became more determined to win.

The two agreed not to say bad things about each other in the primary and to concentrate all their efforts on Jones. Keating hedged slightly.

"I think we did everything right as far as we could go," Keating said.

He admitted his intensive advertising efforts to discredit Jones may have backfired, but would not ditch that if he had a second chance.

"I FEEL JIM JONES is a crook and I will feel he is a crook as long as he is in office," Keating said.

"I don't intend to be anything but myself. If that is objectionable to the voters, I can make a living at something else."

Keating called Inhofe at 10 p.m. Tuesday to concede and offer his support. When asked earlier whether he expected to have a visible or background role in the general election campaign, Keating said the voters have shown

they don't want him to have a visible one.

The remaining puzzle is why Mrs. Warner got into the race. Friends and relatives tried to talk her out of running this year since she decided to enter in late May after Keating and Inhofe had garnered most of the money and workers.

One member of the campaign said Mrs. Warner entered very naively. She has done well in nonpartisan races for

built on that base for her congressional drive.

MANY OF THOSE school board supporters, however, were Democrats who said they would help her after the primary.

Many have speculated she was just building name recognition for another race and it's possible the campaigning of the past few months is a prelude to another congressional bid.

She admits she never expected to come out on top but says she always felt she could be in a runoff.

She said she entered because she felt it was important.

"Some things need to happen in Congress now and people need to be aware of the indeciveness in Congress. There is a need for people to see things that are not being done. I said some things that needed to be said," Mrs. Warner said.

INHOFE FOR CONGRESS COMMITTEE
4606 East 67th Street
Tulsa, Oklahoma 74136

CC-1046

MUR 275

RECEIVED
FEDERAL ELECTION
COMMISSION

76 NOV 22 AM 10:43

November 18, 1976

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John G. Murphy, Jr.
General Counsel
Federal Election Commission
Washington, D.C. 20463

763789

Re: Mur 275 (76)

Dear Mr. Murphy:

In your letter dated November 1, 1976 and received on November 10, 1976, you have asked me to address the following issues:

- (1) Whether the Committee incurred expenses in connection with the July 8, 1976 cocktail reception.

The Committee did incur an expense of \$806.57 as indicated by the attached invoice from Southern Hills Country Club. The expense was incurred in the name of Ben Voth as a convenience because he had an account at the Southern Hills Country Club. The amount of \$806.57 was paid to Ben Voth on September 27, 1976 as indicated on the attached copy of the cancelled check and reported on the October 10, 1976 report to the Federal Election Commission.

- (2) Whether the use of the Southern Hills Country Club facilities for the aforementioned event was donated by the owners thereof.

As indicated from the above issue, the facility was not donated. The use of the facility was included in the \$806.57.

- (3) Whether the payment to Senator Carl Curtis for "outside services" which was reported in the October 10 Report covered the expenses for his appearance on behalf of Mr. Inhofe on July 8, 1976.

The payment to Senator Carl Curtis covered the expenses of his round-trip airfare from Washington, D.C. to Tulsa. This expense was paid by Senator Carl Curtis, and the payment was to reimburse him for the expense.

- (4) The circumstances surrounding a private cocktail reception in support of Mr. Inhofe's candidacy held

77040751

Mr. John Murphy, Jr.
Page Two
November 18, 1976

at the home of John Rooney in the summer of 1976, with particular emphasis on the expenses in connection therewith.

On September 9, 1976 a cocktail party was held at the home of John Rooney in support of Mr. Inhofe. According to Mrs. Rooney, the expenses incurred amounted to \$278.65 which was for beverages. It is our understanding that in accordance with 2 U.S.C. Sec. 431 e (5) B a contribution does not include the use of real or personal property and the cost of invitations, food and beverages, voluntarily provided by an individual to a candidate in rendering voluntary personal services on the individual's residential premises for candidate-related activities.

As treasurer for the Inhofe for Congress Committee, I have endeavored to report all contributions and expenditures in accordance with the Federal Election Campaign Laws.

Early in the campaign, I called the Federal Election Commission on two occasions and requested how we should report receipts on these activities. I was informed that we should report the receipts on an individual basis if the amount put the contributor over \$100. This required much more bookkeeping to keep track of the contributions, but it was done on that basis. If this is in violation of the act, please inform me if the reports need to be amended.

If you need any other information or if you have any questions, please contact me (telephone no. 918/492-8800).

Yours very truly,



Russell D. Robinson

RDR:dh
Enclosures

Filed 10-8-76

Schedule B

January 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures

Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
(see Instructions on back)

Page 2 of 3 for

LINE NUMBER 20 (A)

(Use separate schedule(s) for each numbered line).

Name of Candidate or Committee in full

Inhofe for Congress Committee

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Fred N. Davis & Associates Suite 700 5800 East Skelly Drive Tulsa, Oklahoma 74135	Advertising	9-17-76	\$1,937.50
A.B. Dick Products 601 East Fourth Street Tulsa, Oklahoma 74130	Office Supplies	9-20-76	170.15
Fairmont Mayo 115 W. Fifth Tulsa, Oklahoma 74103	Rent - Bellmon Reception	9-21-76	100.00
Ben Voth 2001 Bank of Okla. Bldg. Tulsa, Oklahoma 74103	Entertainment	9-27-76	806.57
City of Tulsa P. O. Box 2701 Tulsa, Oklahoma 74187	Rental of Assembly Center	9-27-76	250.00
Adrian Smith 11444 E. 4th Place Tulsa, Oklahoma 74128	Campaign Expenses	9-27-76	157.41
Cogman & Associates 111 N.W. Twenty-Third Street Oklahoma City, Oklahoma 73103	Advertising & Consulting	9-27-76	1,000.00
Republican National Committee 310 First St., S.E. Washington, D.C. 20003	Ford-Inhofe Telephone Survey	9-21-76	1,600.00

Subtotal of expenditures this page (optional). ▶ \$ 6,021.63

Total this period (last page this line number only) ▶ \$

FILED 10-8-76

Schedule B

January 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures

Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
(see instructions on back)

Page 1 of 3 for

LINE NUMBER 20 (A)

(Use separate schedule(s) for each numbered line).

Name of Candidate or Committee in full

Inhofe for Congress Committee

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
American Airlines 507 South Boston Tulsa, Oklahoma 74103	Air Fare to Washington	9-14-76	\$ 247.00
U.S. Post Office Federal Building Tulsa, Oklahoma 74103	Stamps and Postage	9-16-76	\$1,560.00 710.00 520.00 50.00 10.00
Pete Morgret P. O. Box 2617 Tulsa, Oklahoma 74101	Expenses Expenses Rent Expenses Salary Expenses	9-14-76 9-14-76 9-17-76 9-20-76 9-24-76 9-24-76	Amount of each expenditure this period 19.07 49.50 130.00 275.87 375.00 68.05
Southwestern Bell 1720 South Boulder Tulsa, Oklahoma	Deposit	9-17-76	150.00
Bill Parish III 4645 E. 55th Place Tulsa, Oklahoma 74135	Contract Labor	9-17-76	400.00
Beverly McVay 2310 S. 83rd E. Avenue Tulsa, Oklahoma	Outside Labor	9-17-76	100.00
Senator Carl Curtis 2213 New Senate Office Building Washington, D.C. 20003	Outside Services	9-17-76	200.00
I.B.M. 700 1st Nat'l. Center East Oklahoma City, Okla. 73102	Equipment Rental	9-17-76	187.20

Subtotal of expenditures this page (optional). ▶ \$ 4,801.69

Total this period (last page this line number only) ▶ \$

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0375

SECRETARY, PARSONS

28852

7/5/76

70

70 Cocktail party

37 700.00

21 Unit 75.55

32.02 31.02

Qd. 9/27/76
ck. # 292



COUNTRY
CLUB

BOX 7159 TULSA, OK 74105

9036-5

515, 57, 433

Ben Veth

OFFICE OF GENERAL COUNSEL

7704000175
INHOPE FOR CONGRESS COMMITTEE
4606 EAST 67TH STREET
TULSA, OKLAHOMA 74136

**AMERICAN BANK
OF TULSA**

TULSA, OKLAHOMA

271 86-156
1039

September 17 19 75

PAY TO THE ORDER OF Senator Carl Curtis

\$ 200.00

-----Two Hundred and NO/100-----

DOLLARS

THIS CHECK IS IN FULL SETTLEMENT OF ACCOUNT AS SHOWN HEREON. ACCEPTANCE BY ENDORSEMENT CONSTITUTES RECEIPT IN FULL.

INHOPE FOR CONGRESS COMMITTEE

Russell D. Labenier

1039 0156 40 0285 3

000000 200000

INHQFE FOR CONGRESS COMMITTEE
4606 East 67th Street
Tulsa, Oklahoma 74136

RECEIVED
FEDERAL ELECTION
COMMISSION

'76 NOV 22 AM 10:23

7040024760

CERTIFIED

No. 025176

MAIL

Mr. John G. Murphy, Jr.
General Counsel
Federal Election Commission
Washington, D.C. 20463

RETURN RECEIPT

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

October 12, 1976

10-12-76 43

The Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

762822

Dear Sir:

A review of the personal reports filed by Jim Inhofe, candidate for Congress, First District of Oklahoma, and the reports of the Inhofe for Congress Committee suggests that serious violations of the reporting requirements of the Federal Election Campaign Act have been made. I request that the reports be audited immediately.

I believe that the following are gross omissions and should be questioned:

1. On July 8, 1976, a private cocktail reception in support of Jim Inhofe's Congressional candidacy was held at the Southern Hills Country Club, Tulsa, Oklahoma. The purpose of this function was to raise money for the Jim Inhofe campaign. The guest of honor was Senator Carl Curtis. The requested amount for attendance was \$125.00 minimum and \$1000.00 maximum (see Exhibits A, B, and E).

This event is not mentioned anywhere in any campaign finance reports filed by Mr. Inhofe personally, or in those reports filed by his Committee. The failure to report the expenses of this private cocktail reception, and to reveal who paid for it, appears to be a violation of 2 USC 434. A review of these same reports reveals that Mr. Inhofe's committee did report expenses of a public Bean Dinner honoring Mr. Curtis which occurred the same evening (see Exhibit C). Neither event was handled according to the accounting procedures for sales of tickets outlined in 2 USC 434, and the expenses of Mr. Curtis's visit are unreported.

2. Sometime in the summer of 1976, a private cocktail reception in support of Jim Inhofe's Congressional candidacy was held at the home of John Rooney, Tulsa, Oklahoma. The purpose of this function was to raise money for the Jim Inhofe campaign. This event is not mentioned anywhere in any campaign reports filed by Mr. Inhofe personally, or in those reports filed by his committee. The failure to report the expenses of this private cocktail reception, and to reveal who paid for it, appears to be a violation of 2 USC 434.

3. In early 1976, Candidate Jim Inhofe made a trip to Milwaukee, Wisconsin, to attend a seminar on political organization. The week-long training session was conducted by Congressman Robert Kasten (see also Exhibit D, Tulsa Tribune, August 25, 1976). Candidate Inhofe was accompanied by an aide, Ed Hendrix (Inhofe speech, LaFortune Park, Summer, 1976). It is not known whether they were transported by private or commercial airlines. While a portion of Mr. Hendrix's expenses are reported, Mr. Inhofe's expenses on this trip are not mentioned anywhere in any campaign reports filed by Mr. Inhofe personally, or in those reports filed by his committee. The failure to report the full expenses of Mr. Hendrix and Mr. Inhofe, and to reveal who paid them, appears to be a violation of 2 USC 434.

4. Shortly before announcing his candidacy in early February, 1976, Jim Inhofe travelled to Washington, D. C. The purpose of this trip was political in nature. He addressed the American Conservative Union, whose endorsement he has since received, and he is known to have met with the Committee for Survival of a Free Congress, which thereafter, contributed money to his Congressional candidacy. The expenses of this trip are not mentioned anywhere

---continued

COPI
OFFICE OF GENERAL COUNSEL

in any campaign reports filed by Mr. Inhofe personally, or in those reports filed by his committee. The failure to report these expenses, and to reveal who paid them, appears to be a violation of 2 USC 434.

5. Mr. Inhofe is known to have made at least one subsequent trip to Washington, D. C. Thereafter it was announced that several individuals from Washington, D. C., had joined his Tulsa campaign staff, and substantial contributions originating in Washington, D. C., appear on his committee's campaign reports. These facts suggest that the purpose of this trip was political in nature. The expenses of this trip are not mentioned anywhere in any campaign reports filed by Mr. Inhofe, or his committee.

6. Several weeks before the August 24, 1976, primary election, a substantial yard sign campaign was launched by Candidate Inhofe. The expense of the wood used in the construction and erection of these signs is not mentioned anywhere in any campaign report filed by Mr. Inhofe, or his committee. The failure to report this expense and to reveal who paid it appears to be a violation of 2 USC 434(b).

It appears that these items, on their face, violated the Federal Election Campaign Act, and I am reporting them in accordance with the provisions of 2 USC 437(g) as revised by the Federal Election Campaign Act Amendments of 1976.

Sincerely yours,



John Bumgarner, Jr.
2145 East 27th Street
Tulsa, Oklahoma

Subscribed and sworn to (affirmed) before me this

11th

day of

October

, 19

76



NOTARY

My commission expires

March 19, 1979.

VERIFIED
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

EXHIBIT "A"

BEN VOTH
2001 NATIONAL BANK OF TULSA BLDG
TULSA, OKLAHOMA 74103
PHONE (918) 583-0636

Dear Mr. [REDACTED]

June 25, 1976

Enclosed is your invitation to a reception at Southern Hills Country Club Thursday, July 8, 1976 honoring Carl T. Curtis, United States Senator from Nebraska who is appearing on behalf of Senator Jim Inhofe, Republican candidate for the First Congressional District. Senator Curtis is the ranking minority member of the Senate Finance Committee which has jurisdiction over taxes, social security, medicare, tariffs and trade. These are vital to all of us. He is also the Chairman of the Republican Conference of United States Senate. Senator Curtis is leading the effort to repeal O.S.H.A.

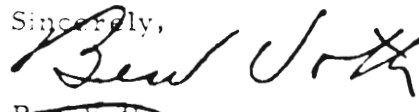
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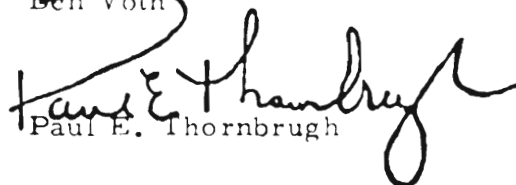
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B.B. Blair

Sincerely,


Ben Voth


Glade Kirkpatrick


Paul E. Thornbrugh

R.S.V.P. June 28, 1976

A copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington D.C.

EXHIBIT "B"

PLACE
STAMP
HERE

BEN VOTH
2001 NBT, Bldg.
Tulsa, Oklahoma 74103

EXHIBIT "E"

INHOFE FINANCE COMMITTEE

Gerald M. Bauer
Franklin E. Bernsen
Walter Biery
Ted C. Bodley
Glade Kirkpatrick
Dr. Dan E. Brannin
Walter Bryce
Victor M. Holmes
Charles C. Killin
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John L. Livingston, Jr.

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Bert McElroy
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Donald E. Pray
Dr. Frank Sommer
John W. Sublett
Dr. C. T. Thompson
Robert J. Thompson
Paul Thornbrugh
Ben Voth
T. D. Williamson, Jr.

COCKTAIL RECEPTION

Honoring
United States Senator Carl T. Curtis, Nebraska
State Senator James Inhofe,
Candidate
United States Congress
Thursday, July 8, 1976

\$ 125.00 minimum
\$1000.00 maximum
Admits two

5 - 7 p.m.

EXHIBIT
COPY
COUNSEL

July, 1976

Paid Political Announcement

OLD FASHIONED BEAN DINNER

with

U.S. SENATOR CARL CURTIS

appearing for

JIM INHOFE

Republican for Congress

7:00 P.M.

Thursday, July 8

Dutsch's Recreation Center

8825 E. 91st (On 91st East of Memorial)

\$5 Per Person \$12 Per Family

Tickets Available at the Door

or call

Inhofe for Congress Headquarters 743-4486

Paid by Inhofe for Congress Committee, Bert McElroy, Ch.
Russell Robinson, Treas., Box 2617, Tulsa, Ok. 74101

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

7704001761

2 sides to GOP battle in 1st Dist.

By PEARL WITKOPP

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Others spent months compiling voting data on every voter in the district and from that determining how many votes Inhofe needed in each precinct to win the primary election and the general.

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"Only one didn't win and I think there was some mistake," he said.

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He disregards suggestions from the Keating camp that it was his super-conservative image that got him the votes.

"The charge isn't true. Frank and I never discussed the issues and no one was aware our ideologies differed. It's not my personality or the advertising. It is the system," Inhofe said.

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"I don't intend to be anything but myself. If that is objectionable to the voters, I can make a living at something else."

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MANY OF THOSE school board supporters, however, were Democrats who said they would help her after the primary.

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She said she entered because she felt it was important.

"Some things need to happen in Congress now and people need to be aware of the indeciveness in Congress. There is a need for people to see things that are not being done. I said some things that needed to be said," Mrs. Warner said.

EXHIBIT D
OFFICE OF GENERAL COUNSEL

John Bumgarner, Jr.
2145 East 27th Street
Tulsa, Oklahoma

The Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

3443

EXPRESS

**FEDERAL
EXPRESS**

COURIER PAK

11/11/76 03050226 741-0000-7

John Benjamin, Jr.
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Tulsa, Ok. 74115

Federal Action Commission
1325 K Street, N.W.
Washington, D.C. 20004

Hold At Airport

Yes ☒

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CHARGES

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FEDERAL ELECTION COMMISSION

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

September 29, 1976

NOTICE TO ALL CANDIDATES AND COMMITTEES

During the course of the review of reports of contributions and expenditures, the Commission has noted that some committees and candidates are failing to fully describe the purpose of itemized expenditures, see §102.9 of the Commission's proposed regulations and 2 U.S.C. §432(d).

As required by the statute, the "particulars" of each over-\$100 expenditure must be reported. Entries such as "advance to fieldman" or "travel" are not sufficient to meet the statutory requirement. An advance to staff is not an expenditure, but rather an intra-committee transfer. The actual use to which the advance is put must be itemized. For example, if a fieldman receives a \$500 advance and spends \$250 to rent a hall; \$125 on posters; and \$125 on meals and lodging, each of those expenditures must be specifically itemized. Expenditures of \$100 or less need not be itemized, but must be aggregated and reported as unitemized expenditures. Back-up material for these expenditures should be maintained.

The Commission notes that some committees and candidates are not maintaining receipted bills or invoices as back-up for expenditures. The proposed regulations permit a canceled check and a contemporaneous memorandum to be kept instead of a receipted bill. That type of back-up may be used only if a receipted bill is not available, since a canceled check/memorandum back-up usually does not provide as much information as a bill or invoice.

If you or your treasurer have questions about these matters, please contact the Commission's auditing section at (202) 382-6023. The Commission urges you to voluntarily comply with the points in this notice.

Sincerely yours,

Vernon W. Thomson
Vernon W. Thomson
Chairman for the
Federal Election Commission

