



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

December 17, 1997

MEMORANDUM

Audit Referral 97-04

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JOHN C. SURINIA
STAFF DIRECTOR

FROM: ROBERT J. COSTA *RK*
ASSISTANT STAFF DIRECTOR
AUDIT DIVISION

SUBJECT: PEROT '96 - MATTER REFERABLE

On December 4, 1997, the Commission approved the audit report on Perot '96 (the Committee). The report was released to the public on December 17, 1997. The following finding is being referred to your office in accordance with the materiality thresholds approved by the Commission: Apparent Excessive Contributions Resulting from Staff Advances.

The Audit staff notes that one staff person was involved in this finding. The highest excessive balance for this individual was \$26,293 and the number of days outstanding before reimbursement ranged from 21 to 36 days. This finding is referable when compared to the applicable threshold. However, since the amount involved is relatively low, this matter, in the Audit staff's opinion, should not be pursued.

All workpapers and related documentation are available for review in the Audit Division. Should you have any questions, please contact Tom Hintermister or Marty Favin at 219-3720.

Attachment:

Perot '96 Audit Report Finding II.A., (Apparent Excessive Contributions Resulting from Staff Advances), pages 3-6.

II. AUDIT FINDINGS AND RECOMMENDATIONS:
NON-REPAYMENT MATTERS

A. APPARENT EXCESSIVE CONTRIBUTIONS RESULTING FROM STAFF
ADVANCES

Section 441a(a)(1)(A) of Title 2 of the United States Code states, in part, that no person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed \$1,000.

Section 116.5(b) of Title 11 of the Code of Federal Regulations states that the payment by an individual from his or her personal funds, including a personal credit card, for the costs incurred in providing goods and services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee is a contribution unless the payment is exempted from the definition of contribution under 11 CFR §100.7(b)(8). If the payment is not exempted under 11 CFR §100.7(b)(8), it shall be considered a contribution by the individual unless: the payment is for the individual's transportation expenses incurred while traveling on behalf of a candidate or political committee of a political party or for usual and normal subsistence expenses incurred by an individual, other than a volunteer, while traveling on behalf of a candidate or political committee of a political party; and, the individual is reimbursed within sixty days after

the closing date of the billing statement on which the charges first appear if the payment was made using a personal credit card, or within thirty days after the date on which the expenses were incurred if a personal credit card was not used. For purposes of this section, the closing date shall be the date indicated on the billing statement which serves as the cutoff date for determining which charges are included on that billing statement. In addition, "subsistence expenses" include only expenditures for personal living expenses related to a particular individual traveling on committee business, such as food or lodging.

The Audit staff reviewed the travel expense reimbursements and contributions relative to one individual who apparently advanced funds on behalf of the Committee in excess of the \$1,000 limitation. In order to calculate the amount of a contribution resulting from an advance made by an individual on behalf of the Committee, payments made by the Committee were applied against those expenses that had been incurred the earliest. The Audit staff notes that this individual paid the transportation, travel, and other campaign expenses incurred by other individuals, including the Vice Presidential candidate, using a personal credit card. This individual also contributed \$500.00 to the Committee on September 5, 1996. The highest excessive balance for this individual was \$26,293 on 10/16/96. The number of days outstanding before reimbursement of the expenses included in this balance ranged from 21 to 36 days.

The Audit staff provided to the Committee a list of the relevant expenses and contributions associated with this individual. In response, the Committee provided a photocopy of an internal Committee memorandum, dated August 8, 1996, from the Committee's National Coordinator to all campaign staff which stated that the Committee was unable to locate any credit card companies willing to offer credit cards to a political entity. The memorandum also informed the campaign staff that they could apply for individual credit cards for travel expenses.

In addition, the Committee provided a statement from a staff member of the Committee's Accounts Payable Department, dated April 22, 1997, which explained that the Committee was rejected by three different credit card companies because current policy prevented the companies from extending a line of credit to political entities.

The Committee officials also provided the following rationale for the manner in which they handled travel expenses. The Committee stated that they did not want to risk violating the regulations by having expenditures made by the Vice Presidential candidate count towards the Presidential candidate's \$50,000 expenditure limit at 11 CFR §9003.2(c). The Committee also stated that:

"...it was simply impractical in certain instances for the presidential and vice-presidential nominees to stand in hotel cashier lines to pay their bills when, for example, cars to take

them to television interviews or campaign functions were waiting."

Notwithstanding the above, the Audit staff maintained that this individual apparently made contributions in excess of the \$1,000 contribution limit resulting from staff advances.

In the Exit Conference Memorandum, (the Memorandum) the Audit staff recommended that the Committee provide evidence to support that the staff advances noted above were not excessive contributions, as well as any additional comments it believed relevant.

In its response to the Memorandum, the Committee restated the points outlined above, and put forth additional arguments in support of its position that the Committee was at all times in compliance with the purpose and intent of 11 CFR §116.5.

The Committee noted that all such expenses were promptly reimbursed, most within 30 days after the expense was incurred and before the individual actually issued payment to the credit card company. Since the Committee experienced no financial difficulties during this period, to suggest that the situation is equivalent to an attempt to circumvent contribution limitations is completely inaccurate. If any violation occurred it was merely technical and inadvertent, and quickly corrected.

Given the Committee was unable to locate any credit card company willing to offer credit cards, it is then asserted by the Committee that the use of this individual's personal credit card was the only alternative since it would be unrealistic to expect presidential and vice-presidential nominees to stand in hotel cashier lines in all instances, or to expect all staff members, especially young or college age individuals working on political campaigns, to meet credit requirements necessary to qualify for personal credit cards. The Audit staff acknowledges that traveling with large quantities of campaign cash would not be appropriate, and would not solve the requirement of certain vendors who require credit cards to guarantee payment.

The Committee then concludes its discussion by citing a closed Commission compliance matter involving staff advances where the Commission closed the matter without a finding of probable cause to believe a violation of 11 CFR §116.5 occurred. (See MUR 3947). The Committee also notes that 11 CFR §103.3 provides a political committee 60 days during which it may refund excessive contributions. There is no justification, according to the Committee, for treating an excessive contribution resulting from an inadvertent staff advance more strictly than an actual excessive contribution, thereby denying a reasonable opportunity to cure the unintentional violation.

As to the Committee's first point, the Audit staff agrees that the individual was reimbursed in a prompt manner; however, since the expenses at issue were not for his transportation and/or subsistence, reimbursement even within 30 days from the date of incurrence does not negate a contribution having been made. The Committee's financial condition also does not negate a contribution having been made.

The Committee's second point relating to the use of this individual's personal credit card as the "only alternative" does not consider the use of electronic fund transfers, or other appropriate means of guaranteeing or effecting payment of expenses when the vendor payee is known in advance.

As to the Committee's concluding arguments, it should be noted that the matter referred to in the closed compliance matter was also first addressed in the audit report and was characterized as an apparent excessive contribution resulting from staff advances in a manner similar to the issue at hand. With respect to the timing of the reimbursements, the Commission's policy in previous election cycles and its current policy is not to apply the provisions of 11 CFR §103.3 to excessive contributions resulting from staff advances. Included in the provisions of 11 §CFR 116.5 are its own set of time limitations separate and apart from those in 11 CFR §103.3.

Although it appears that the Committee did not gain any material financial advantage from the practice of using an individual's personal credit card to defray the expenses of other Committee staff and the vice-presidential nominee, under the provisions of 11 CFR §116.5 this activity resulted in an apparent excessive contribution of \$26,293.

Perot '96, Inc.

Travel Advances- 11 CFR 116.5

(Assignment)

(Subject)

Name	1	2	3	4	5	6	7	8	9	10	11	12	13
	W/S Voucher Number	W/S Incurrence Date	W/S Calculated Date	W/S Incurrence Amount	W/S Outstanding Amount	W/S Expense Code	W/S Reimburse Date	W/S Days Outstanding	W/S Contribution Amount	W/S Contribution Balance	W/S Excess Amount	W/S Excess After Reimburse	Comments
Mike Morris	4	07/19/96	07/19/96	\$30.90	\$30.90	4	09/04/96	47	\$30.90	(\$969.10)			
	13	08/05/96	08/05/96	\$80.00	\$110.90	4	08/04/96	29	\$90.00	(\$989.10)			
	1	08/21/96	08/21/96	\$47.90	\$457.90	4	08/09/96	18	\$110.90	(\$778.20)			
	2	08/20/96	08/20/96	\$121.30	\$579.20	4	09/18/96	20	\$110.90	(\$889.10)			
	99	08/20/96	08/20/96	\$500.00	\$739.20	7		0	\$0.00	(\$378.20)			
	2	08/20/96	08/20/96	\$121.30	\$610.50	1		0	\$0.00	(\$388.10)			
	3	08/14/96	08/14/96	\$2,015.00	\$2,525.50	4	09/19/96	5	\$0.00	(\$388.10)			
	3	08/14/96	08/14/96	\$213.87	\$2,938.50	4	09/19/96	5	\$0.00	(\$388.10)			
	3	08/14/96	08/14/96	\$1,332.00	\$4,482.77	4	10/09/96	24	\$110.90	(\$276.20)			
	4	08/16/96	08/16/96	\$1,872.00	\$6,354.77	4	10/09/96	23	\$1,872.00	\$1,053.80			
	4	08/17/96	08/17/96	\$18.95	\$6,373.72	5	10/09/96	22	\$1,872.00	\$2,925.00			
	3	08/19/96	08/19/96	\$3,539.87	\$3,539.85	1		0	\$0.00	\$2,925.00			
	4	08/20/96	08/20/96	\$23.00	\$3,562.85	4	10/09/96	18	\$0.00	\$2,925.00			
	4	08/20/96	08/20/96	\$4.57	\$3,567.42	4	10/09/96	16	\$4.57	\$2,925.00			
	4	08/20/96	08/20/96	\$23.00	\$3,590.42	4	10/09/96	18	\$23.00	\$2,925.00			
	4	08/21/96	08/21/96	\$8.30	\$3,598.72	5	10/09/96	17	\$0.00	\$2,925.00			
	4	08/21/96	08/21/96	\$9.30	\$3,608.02	5	10/09/96	17	\$11.00	\$2,925.00			
	4	08/23/96	08/23/96	\$288.55	\$3,896.57	4	10/09/96	15	\$0.00	\$2,925.00			
	5	08/23/96	08/23/96	\$9,549.61	\$13,860.58	4	10/09/96	15	\$0.00	\$2,925.00			
	4	08/23/96	08/23/96	\$13.00	\$13,873.58	4	10/09/96	15	\$0.00	\$2,925.00			
	4	08/23/96	08/23/96	\$1.50	\$13,875.08	5	10/09/96	15	\$0.00	\$2,925.00			
	4	08/23/96	08/23/96	\$6.51	\$13,881.59	5	10/09/96	15	\$0.00	\$2,925.00			
	4	08/24/96	08/24/96	\$6.30	\$13,887.89	4	10/09/96	14	\$0.00	\$2,925.00			
	4	08/24/96	08/24/96	\$172.89	\$14,060.78	4	10/09/96	14	\$0.00	\$2,925.00			
	4	08/24/96	08/24/96	\$3.15	\$14,063.93	4	10/09/96	14	\$0.00	\$2,925.00			
	4	08/24/96	08/24/96	\$1.50	\$14,065.43	5	10/09/96	14	\$0.00	\$2,925.00			
	4	08/24/96	08/24/96	\$3.00	\$14,068.43	5	10/09/96	14	\$0.00	\$2,925.00			
	4	08/25/96	08/25/96	\$50.00	\$14,118.43	4	10/09/96	13	\$0.00	\$2,925.00			
	4	08/25/96	08/25/96	\$8,488.50	\$22,596.93	4	10/17/96	22	\$0.00	\$2,925.00			
	4	08/25/96	08/25/96	\$17.05	\$22,613.98	4	10/17/96	22	\$17.05	\$2,925.00			
	4	08/25/96	08/25/96	\$28.52	\$22,642.50	4	10/17/96	22	\$28.52	\$2,925.00			
	4	08/25/96	08/25/96	\$5.51	\$22,648.01	5	10/17/96	22	\$0.00	\$2,925.00			
	4	08/25/96	08/25/96	\$38.00	\$22,686.01	5	10/17/96	22	\$0.00	\$2,925.00			
	4	08/25/96	08/25/96	\$3.30	\$22,689.31	5	10/17/96	22	\$0.00	\$2,925.00			
	4	08/25/96	08/25/96	\$13.30	\$22,702.61	6	10/17/96	22	\$0.00	\$2,925.00			
	9	08/26/96	08/26/96	\$160.00	\$22,862.61	4	10/17/96	21	\$160.00	\$2,925.00			
	4	08/26/96	08/26/96	\$28.52	\$22,891.13	4	10/17/96	21	\$28.52	\$2,925.00			
	4	08/26/96	08/26/96	\$138.88	\$23,029.99	5	10/17/96	21	\$0.00	\$2,925.00			
	4	08/26/96	08/26/96	\$23.00	\$23,052.99	5	10/17/96	21	\$0.00	\$2,925.00			
	4	08/26/96	08/26/96	\$12.32	\$23,065.31	6	10/17/96	21	\$0.00	\$2,925.00			
	4	08/26/96	08/26/96	\$391.19	\$23,456.50	6	10/17/96	21	\$0.00	\$2,925.00			
	11	08/27/96	08/27/96	\$3,777.00	\$28,023.50	4	10/22/96	25	\$3,777.00	\$13,437.01			
	4	08/27/96	08/27/96	\$1,653.52	\$29,677.02	4	10/22/96	25	\$1,653.52	\$15,090.57			

Other Campaign Expenses &
Other Persons Travel

B

B

B

Perot '96, Inc.

Travel Advances- 11 CFR 116.5

(Assignment)

(Subject)

Name	1	2	3	4	5	6	7	8	9	10	11	12	13
	W/S Voucher Number	Incurrence Date	W/S Calculated Date	W/S Incurrence Amount	W/S Outstanding Amount	W/S Expense Code	W/S Reimburse Date	W/S Days Outstanding	W/S Contribution Amount	W/S Contribution Balance	W/S Excess Amount	W/S Excess After Reimburse	Comments
	11	02/29/96	02/29/96	\$2,222.00	\$31,371.40	4	11/04/96	38	\$2,222.00	\$17,312.57	\$17,312.57		
	12	10/07/96	10/07/96	\$10.00	\$31,371.40	4	11/04/96	24	\$70.00	\$17,382.57	\$17,382.57		
	5	10/03/96	10/03/96	\$32,753.40	\$32,753.40	4	11/04/96	32	\$70.00	\$18,164.57	\$18,164.57		
	4	10/04/96	10/04/96	\$28.00	\$32,781.40	4	11/04/96	31	\$26.00	\$18,162.57	\$18,162.57		
	4	10/04/96	10/04/96	\$9.30	\$32,790.70	5	11/04/96	31	\$9.30	\$18,201.87	\$18,201.87		
	4	10/02/96	10/03/96	(\$15,532.09)	\$17,258.61	1	11/04/96	0	\$0.00	\$14,925.00	\$14,925.00	\$14,925.00	C
	5	10/03/96	10/03/96	\$25.01	\$17,283.62	4	11/04/96	26	\$25.01	\$14,950.01	\$14,950.01		
	5	10/10/96	10/10/96	\$43.17	\$17,326.79	4	11/04/96	25	\$43.17	\$14,993.18	\$14,993.18		
	7	10/14/96	10/14/96	\$10,680.54	\$28,007.33	4	11/04/96	24	\$10,680.54	\$25,573.22	\$25,573.22		
	12	10/14/96	10/14/96	\$638.00	\$28,645.33	4	11/04/96	24	\$638.00	\$26,211.72	\$26,211.72		
	5	10/15/96	10/15/96	\$46.95	\$28,692.28	4	11/07/96	23	\$46.95	\$26,258.67	\$26,258.67		
	6	10/15/96	10/15/96	\$11.73	\$28,704.01	6	11/07/96	23	\$0.00	\$26,258.67	\$26,258.67		
	6	10/15/96	10/15/96	\$1,422.00	\$30,126.01	5	11/07/96	2	\$0.00	\$26,258.67	\$26,258.67		
	6	10/16/96	10/16/96	\$43.14	\$30,169.15	4	11/07/96	22	\$43.14	\$26,301.81	\$26,301.81		
	5	10/17/96	10/17/96	(\$10,456.62)	\$19,712.53	1	11/07/96	0	\$0.00	\$17,276.80	\$17,276.80	\$17,276.80	Highest Excessive Amount
	6	10/17/96	10/17/96	\$2.18	\$19,714.71	4	11/07/96	21	\$2.18	\$17,280.98	\$17,280.98		
	6	10/17/96	10/17/96	\$1,275.75	\$20,990.46	4	11/08/96	22	\$1,275.75	\$18,556.73	\$18,556.73		
	6	10/17/96	10/17/96	\$641.87	\$21,632.33	4	11/15/96	29	\$641.87	\$19,399.60	\$19,399.60		
	6	10/17/96	10/17/96	\$14.56	\$21,646.89	4	11/15/96	29	\$14.56	\$19,413.16	\$19,413.16		
	6	10/17/96	10/17/96	\$5.01	\$21,651.90	5	11/15/96	29	\$0.00	\$19,413.16	\$19,413.16		
	6	10/17/96	10/17/96	\$7.28	\$21,659.18	5	11/15/96	29	\$0.00	\$19,413.16	\$19,413.16		
	5	10/18/96	10/18/96	\$405.59	\$22,064.77	4	11/15/96	28	\$405.59	\$19,818.75	\$19,818.75		
	5	10/18/96	10/18/96	\$704.57	\$22,469.34	4	11/15/96	28	\$204.57	\$20,023.32	\$20,023.32		
	5	10/18/96	10/18/96	\$44.00	\$22,513.34	5	11/15/96	28	\$0.00	\$20,023.32	\$20,023.32		
	5	10/18/96	10/18/96	\$3.25	\$22,516.59	5	11/15/96	28	\$0.00	\$20,023.32	\$20,023.32		
	6	10/18/96	10/18/96	\$17.04	\$22,533.63	5	11/15/96	28	\$0.00	\$20,023.32	\$20,023.32		
	6	10/18/96	10/18/96	\$593.00	\$23,127.43	6	11/26/96	39	\$0.00	\$20,023.32	\$20,023.32		
	6	10/18/96	10/18/96	\$204.57	\$23,332.00	6	11/26/96	39	\$0.00	\$20,023.32	\$20,023.32		
	6	10/18/96	10/18/96	\$152.46	\$23,484.46	5	11/26/96	39	\$0.00	\$20,023.32	\$20,023.32		
	6	10/18/96	10/18/96	\$9.30	\$23,493.76	5	11/26/96	38	\$9.30	\$20,032.62	\$20,032.62		
	6	10/22/96	10/22/96	(\$4,943.55)	\$18,550.21	1	11/26/96	0	\$0.00	\$15,089.97	\$15,089.97	\$15,089.97	
	8	10/22/96	10/22/96	\$7.75	\$18,557.96	5	11/26/96	25	\$7.75	\$15,097.72	\$15,097.72		
	8	10/22/96	10/22/96	\$3.00	\$18,561.68	5	11/26/96	35	\$3.00	\$15,100.72	\$15,100.72		
	8	10/23/96	10/23/96	\$5.21	\$18,566.89	5	11/26/96	34	\$5.21	\$15,105.93	\$15,105.93		
	11	10/23/96	10/23/96	\$108.89	\$18,675.78	4	11/26/96	34	\$108.89	\$15,215.82	\$15,215.82		
	10	10/23/96	10/23/96	\$127.15	\$18,802.93	4	11/26/96	34	\$127.15	\$15,342.97	\$15,342.97		
	8	10/23/96	10/23/96	\$5.30	\$18,808.23	5	11/26/96	34	\$5.30	\$15,348.27	\$15,348.27		
	8	10/23/96	10/23/96	\$7.50	\$18,815.73	5	11/26/96	34	\$7.50	\$15,355.77	\$15,355.77		
	8	10/23/96	10/23/96	\$6.00	\$18,822.73	5	11/26/96	34	\$6.00	\$15,361.77	\$15,361.77		
	8	10/24/96	10/24/96	\$424.00	\$19,246.73	4	11/26/96	33	\$424.00	\$15,785.77	\$15,785.77		
	8	10/24/96	10/24/96	\$3.49	\$19,250.22	4	11/26/96	33	\$3.49	\$15,789.26	\$15,789.26		
	8	10/24/96	10/24/96	\$22.67	\$19,272.89	4	11/26/96	33	\$22.67	\$15,811.93	\$15,811.93		
	8	10/24/96	10/24/96	\$11.33	\$19,284.22	6	11/26/96	33	\$0.00	\$15,815.93	\$15,815.93		
	8	10/25/96	10/25/96	\$2.10	\$19,286.32	4	11/26/96	32	\$2.10	\$15,818.03	\$15,818.03		
	8	10/25/96	10/25/96	\$58.58	\$19,344.90	4	11/26/96	32	\$58.58	\$15,916.61	\$15,916.61		
	8	10/25/96	10/25/96	\$202.57	\$19,547.47	6	11/26/96	32	\$0.00	\$15,916.61	\$15,916.61		
	8	10/26/96	10/26/96	\$20.32	\$19,567.79	4	11/26/96	31	\$20.32	\$15,936.93	\$15,936.93		
	8	10/26/96	10/26/96	\$3.28	\$19,571.07	5	11/26/96	31	\$5.28	\$15,942.21	\$15,942.21		
	8	10/26/96	10/26/96	\$4.50	\$19,575.57	5	11/26/96	31	\$4.50	\$15,946.71	\$15,946.71		

Perot '96, Inc.

Travel Advances- 11 CFR 116.5

(Assignment)

(Subject)

Name	1	2	3	4	5	6	7	8	9	10	11	12	13
	W/S Voucher Number	W/S Incurrence Date	W/S Calculated Date	W/S Incurrence Amount	W/S Outstanding Amount	W/S Expense Code	W/S Reimburse Date	W/S Days Outstanding	W/S Contribution Amount	W/S Contribution Balance	W/S Excess Amount	W/S Excess After Reimburse	Comments
	6	10/26/96	10/26/96	\$10.16	\$10,631.93	6	11/26/96	31	\$0.00	\$10,642.09	\$10,642.09		
	6	10/26/96	10/26/96	\$89.84	\$12,721.87	6	11/26/96	31	\$0.00	\$12,811.71	\$12,811.71		
	6	10/26/96	10/26/96	\$1,016.00	\$20,737.87	6	11/26/96	31	\$0.00	\$21,753.87	\$21,753.87		
	6	10/27/96	10/27/96	\$1.05	\$20,738.92	4	11/26/96	30	\$287.82	\$21,026.74	\$21,026.74		
	10	10/27/96	10/27/96	\$287.82	\$21,026.69	4	11/26/96	30	\$107.31	\$21,134.00	\$21,134.00		
	6	10/27/96	10/27/96	\$107.31	\$21,134.00	4	11/26/96	30	\$0.00	\$21,134.00	\$21,134.00		
	6	10/27/96	10/27/96	\$15.32	\$21,149.32	6	11/26/96	30	\$0.00	\$21,164.64	\$21,164.64		
	12	10/28/96	10/28/96	\$50.00	\$21,199.32	4	11/26/96	29	\$0.00	\$21,199.32	\$21,199.32		
	6	10/28/96	10/28/96	\$4.80	\$21,204.12	4	11/26/96	29	\$0.00	\$21,204.12	\$21,204.12		
	6	10/28/96	10/28/96	\$5.79	\$21,209.91	4	11/26/96	29	\$0.00	\$21,209.91	\$21,209.91		
	6	10/28/96	10/28/96	\$8.28	\$21,218.19	5	11/26/96	28	\$0.00	\$21,218.19	\$21,218.19		
	6	10/28/96	10/28/96	\$8.06	\$21,226.25	5	11/26/96	28	\$0.00	\$21,226.25	\$21,226.25		
	6	10/28/96	10/28/96	\$5.78	\$21,232.04	5	11/26/96	28	\$0.00	\$21,232.04	\$21,232.04		
	6	10/28/96	10/28/96	\$137.37	\$21,369.41	6	11/26/96	29	\$0.00	\$21,369.41	\$21,369.41		
	6	10/28/96	10/28/96	\$333.00	\$21,672.41	6	11/26/96	29	\$0.00	\$21,672.41	\$21,672.41		
	6	10/28/96	10/28/96	\$166.89	\$21,839.10	6	11/26/96	29	\$0.00	\$21,839.10	\$21,839.10		
	6	10/28/96	10/28/96	\$3.86	\$21,842.98	4	11/26/96	28	\$0.00	\$21,842.98	\$21,842.98		
	6	10/28/96	10/28/96	\$42.30	\$21,885.28	4	11/26/96	28	\$0.00	\$21,885.28	\$21,885.28		
	6	10/28/96	10/28/96	\$5.92	\$21,891.20	5	11/26/96	28	\$0.00	\$21,891.20	\$21,891.20		
	6	10/28/96	10/28/96	\$21.15	\$21,912.35	6	11/26/96	28	\$0.00	\$21,912.35	\$21,912.35		
	6	10/28/96	10/28/96	\$25.32	\$21,937.67	4	11/26/96	27	\$0.00	\$21,937.67	\$21,937.67		
	6	10/28/96	10/28/96	\$22.38	\$22,020.05	4	11/26/96	27	\$0.00	\$22,020.05	\$22,020.05		
	6	10/28/96	10/28/96	\$27.96	\$22,048.01	4	11/26/96	27	\$0.00	\$22,048.01	\$22,048.01		
	6	10/28/96	10/28/96	\$13.98	\$22,061.99	5	11/26/96	27	\$0.00	\$22,061.99	\$22,061.99		
	6	10/28/96	10/28/96	\$43.46	\$22,105.45	6	11/26/96	27	\$0.00	\$22,105.45	\$22,105.45		
	13	10/31/96	10/31/96	\$54.00	\$22,159.45	4	11/26/96	26	\$0.00	\$22,159.45	\$22,159.45		
	6	10/31/96	10/31/96	\$13.14	\$22,172.59	4	11/26/96	26	\$0.00	\$22,172.59	\$22,172.59		
	6	10/31/96	10/31/96	\$13.00	\$22,185.59	5	11/26/96	26	\$0.00	\$22,185.59	\$22,185.59		
	6	10/31/96	10/31/96	\$583.00	\$22,768.59	6	11/26/96	26	\$0.00	\$22,768.59	\$22,768.59		
	6	10/31/96	10/31/96	\$305.21	\$23,073.80	6	11/26/96	26	\$0.00	\$23,073.80	\$23,073.80		
	6	10/31/96	10/31/96	\$169.77	\$23,243.57	6	11/26/96	26	\$0.00	\$23,243.57	\$23,243.57		
	6	10/31/96	10/31/96	\$6.55	\$23,250.12	6	11/26/96	26	\$0.00	\$23,250.12	\$23,250.12		
	6	10/31/96	10/31/96	\$332.49	\$23,582.61	4	11/26/96	25	\$0.00	\$23,582.61	\$23,582.61		
	6	11/01/96	11/01/96	\$108.00	\$23,690.61	4	11/26/96	25	\$0.00	\$23,690.61	\$23,690.61		
	6	11/01/96	11/01/96	\$7.00	\$23,703.32	5	11/26/96	25	\$0.00	\$23,703.32	\$23,703.32		
	6	11/01/96	11/01/96	\$3.24	\$23,710.56	5	11/26/96	25	\$0.00	\$23,710.56	\$23,710.56		
	6	11/01/96	11/01/96	\$27.71	\$23,738.27	6	11/26/96	25	\$0.00	\$23,738.27	\$23,738.27		
	6	11/01/96	11/01/96	\$160.00	\$23,898.27	6	11/26/96	25	\$0.00	\$23,898.27	\$23,898.27		
	13	11/02/96	11/02/96	\$458.54	\$24,356.81	4	11/26/96	24	\$0.00	\$24,356.81	\$24,356.81		
	10	11/03/96	11/03/96	\$218.31	\$24,575.12	4	11/26/96	23	\$0.00	\$24,575.12	\$24,575.12		
	6	11/03/96	11/03/96	\$22.00	\$24,597.12	6	11/26/96	23	\$0.00	\$24,597.12	\$24,597.12		
	6	11/03/96	11/03/96	\$42.16	\$24,639.28	6	11/26/96	23	\$0.00	\$24,639.28	\$24,639.28		
	6	11/03/96	11/03/96	\$160.00	\$24,802.28	6	11/26/96	23	\$0.00	\$24,802.28	\$24,802.28		
	6	11/04/96	11/04/96	\$6.47	\$24,808.75	6	11/26/96	23	\$0.00	\$24,808.75	\$24,808.75		
	6	11/04/96	11/04/96	\$6.47	\$24,815.22	1	11/26/96	0	\$0.00	\$24,815.22	\$24,815.22		
	6	11/04/96	11/04/96	\$6.47	\$24,821.69	6	11/26/96	29	\$0.00	\$24,821.69	\$24,821.69		
	6	11/04/96	11/04/96	\$63.25	\$24,884.94	6	11/26/96	29	\$0.00	\$24,884.94	\$24,884.94		
	10	11/05/96	11/05/96	\$316.40	\$25,201.34	4	11/26/96	28	\$0.00	\$25,201.34	\$25,201.34		
	6	11/05/96	11/05/96	\$30.00	\$25,231.34	6	11/26/96	28	\$0.00	\$25,231.34	\$25,231.34		

Perot '96, Inc.

(Assignment)

Travel Advances- 11 CFR 116.5

(Subject)

Name	1	2	3	4	5	6	7	8	9	10	11	12	13
W/S Voucher Number	W/S Incurrence Date	W/S Incurrence Date	W/S Calculated Date	W/S Incurrence Amount	W/S Outstanding Amount	W/S Expense Code	W/S Reimburse Date	W/S Days Outstanding	W/S Contribution Amount	W/S Contribution Balance	W/S Excess Amount	W/S Excess After Reimburse	Comments
8	11/07/96	11/07/96	11/07/96	(\$1,794.38)	\$9,743.28	1		0	\$0.00	\$3,860.42	\$3,860.42	\$3,960.42	
9	11/08/96	11/08/96	11/08/96	(\$493.88)	\$9,249.40	1		0	\$0.00	\$3,366.54	\$3,366.54	\$3,466.54	
10	11/10/96	11/10/96	11/10/96	\$183.57	\$9,432.97	4	12/03/96	23	\$183.57	\$3,550.11	\$3,550.11	\$3,650.11	
11	11/12/96	11/12/96	11/12/96	\$667.00	\$10,099.97	4	12/10/96	28	\$667.00	\$4,217.11	\$4,217.11	\$4,317.11	
12	11/15/96	11/15/96	11/15/96	(\$1,282.17)	\$8,817.80	4		0	\$0.00	\$3,311.51	\$3,311.51	\$3,411.51	
13	11/18/96	11/18/96	11/18/96	\$741.70	\$9,559.50	4	12/23/96	35	\$741.70	\$4,053.21	\$4,053.21	\$4,153.21	
14	11/20/96	11/20/96	11/20/96	(\$6,979.46)	\$2,580.04	1		0	\$0.00	\$1,428.67	\$1,428.67	\$1,528.67	
15	12/03/96	12/03/96	12/03/96	(\$811.70)	\$1,768.34	1		0	\$0.00	\$748.54	\$748.54	\$758.54	
16	12/03/96	12/03/96	12/03/96	\$13.79	\$1,782.13	4	12/23/96	20	\$13.79	\$762.33	\$762.33	\$772.33	
17	12/08/96	12/08/96	12/08/96	\$624.28	\$2,396.41	4	01/16/97	38	\$15.00	\$780.33	\$780.33	\$790.33	
18	12/10/96	12/10/96	12/10/96	(\$1,244.33)	\$1,151.90	1		0	\$0.00	(\$84.00)	\$763.33	\$773.33	
19	12/19/96	12/19/96	12/19/96	\$574.20	\$1,696.40	4		0	\$574.20	\$110.13	\$110.13	\$120.13	
20	12/23/96	12/23/96	12/23/96	\$1,062.00	\$1,062.00	1		0	\$0.00	\$92.20	\$92.20	\$92.20	
21	01/16/97	01/16/97	01/16/97	(\$574.20)	\$518.00	1		0	\$0.00	(\$482.00)	\$92.20	\$92.20	

Adjustments:

A Expense inadvertently missed by Audit staff on original schedule.

B Pro-rated meal expense

C Qualified Campaign Staff Member expense (CFR 100.7(b)(6)); of \$5.30 subtracted from highest excessive amount (\$26,301.81-\$5.30=\$26,296.51)