

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

MAY 22 4 34 PM '00

Paid for by Bush for President, Inc.

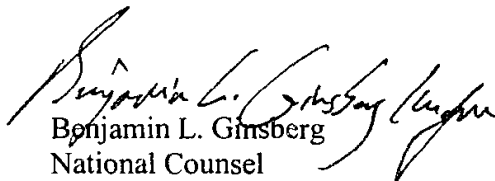
FEC Advisory Opinion 1978-34, Fed. Election Camp. Fin. Guide (CCH ¶ 5328) (July 17, 1978) (confirming that corporations need not be reimbursed in advance but within a commercially reasonable time and defining the "normal and usual rental charge" as "the price of those goods in the market from which they ordinarily would have been purchased").

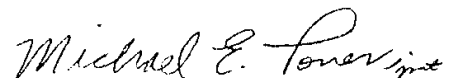
In addition, 11 C.F. R. § 114.13 states that "Notwithstanding any other provisions of part 114, a corporation or labor organization which customarily makes its meeting rooms available to clubs, civic or community organizations, or other groups may make such facilities available to a political committee or candidate, if the meeting rooms are made available to any candidate or political committee upon request and on the same terms given to other groups using the meeting rooms."

The event referenced in the complaint was conducted in full compliance with the foregoing Commission regulations. BFP hired a consultant, ShowTell Productions, to put on the event and pay the appropriate costs of the rally. BFP received 2 invoices (one for \$12,420 and one for \$2,500) from ShowTell productions for the costs associated with the event, such as sound, lighting, staging, pyro, décor, seating, power distribution for the filing center, and runs for computer and lighting. BFP cut a vendor reimbursement check to ShowTell Productions on the day of the event for \$15,920 to cover both of these invoices. BFP's reimbursement was duly reported on its April 20<sup>th</sup> FEC report.

In light of the foregoing, there is absolutely no legal or factual basis for the complaint. Accordingly, the Commission should find that there is no reason to believe that BFP violated the Act and should dismiss the complaint.

Respectfully submitted,

  
Benjamin L. Ginsberg  
National Counsel

  
Michael E. Toner  
General Counsel