



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 732

DATE FILMED: _____

CAMERAMAN _____



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
National Conservative Political)
Action Committee)

MUR 732

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on November 1, 1978, the Commission, meeting in an executive session at which a quorum was present, determined by a vote of 6-0 to take no action and close the file in MUR 732.

Accordingly, the file has been closed.

Attest:

11-3-78

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

78040074385



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS

DATE: OCTOBER 24, 1978

SUBJECT: MUR 732 - First General Counsel's
Report dated 10-24-78
Received in Office of Commission
Secretary: 10-24-78, 10:08

The above-named document was circulated on a 48
hour vote basis at 12:00, October 24, 1978.

Commissioner Harris submitted an objection at
2:30, October 24, 1978, thereby placing MUR 732 on the
Executive Session Agenda for November 1, 1978.

cc: Commissioner Harris

78040074386

October 26, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elisea T. Carr
SUBJECT: MUR 732

Please have the attached First General Counsel's
Report on MUR 732 distributed to the Commission on a 48
hour tally basis.

Thank you.

78040074387

FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL

BY OGC TO COMMISSION OCT 24 1978

MUR78 OCT 17 32 AIO: 08

STAFF MEMBER(S) R. BoginSOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D - AuditRESPONDENT'S NAME: National Conservative Political Action CommitteeRELEVANT STATUTE: 2 U.S.C. -§ 441a(a)(2)(c); § 441a(f)INTERNAL REPORTS CHECKED: Audit findings; A.O. 1977-8, 1977-14.FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

This matter was referred to the Office of General Counsel as a result of the findings of a random audit of the National Conservative Political Action Committee (NCPAC). (see attached).

On June 9, 1977, NCPAC and the Citizens for The Republic (CFR) co-sponsored a joint fundraising effort called "Salute to Ronald Reagan" dinner. The net proceeds from the fundraiser were to be shared equally by NCPAC and CFR. NCPAC made advance expenditures for the fundraiser in the amount of \$1,301.92. CFR made advance expenditures for the fundraiser in the amount of \$14,336.90. CFR acted as the receiving and disbursing agent for the event, and NCPAC delegated its recordkeeping and reporting requirements to CFR.

PRELIMINARY LEGAL ANALYSIS

Each participant in a fundraiser shall bear a prorata share of all advance expenditures required in connection with such fundraising effort. This share shall be determined on the same basis used for allocating the distribution of funds raised through the joint effort. A.O. 1977-14. Thus, any advance payments made in connection with the Salute to Ronald Reagan dinner must be shared equally between CFR and NCPAC. The \$14,336.90 in advance expenditures by CFR offset by the \$1,301.92 in advance expenditures by NCPAC resulted in a contribution in-kind to NCPAC from CFR of \$6,517.49.^{1/}

$$\frac{1}{2} [14,336.90(\text{CFR}) - 1,301.92(\text{NCPAC})] \cdot 50\% = \$6,517.49$$

2 U.S.C. § 441a(a)(2)(C) prohibits a multi-candidate committee from making contributions to any other political committee in any calendar year which in the aggregate, exceeds \$5,000. The contribution in-kind from CFR to NCPAC exceeded this limit by \$1,517.49.

2 U.S.C. § 441a(f) prohibits a political committee from knowingly accepting contributions in violation of 2 U.S.C. § 441a(a)(2)(C). As the beneficiary of the contribution in-kind made by CFR, NCPAC accepted an excessive contribution.

Recommendation

1. Find reason to believe that the Citizens for The Republic violated 2 U.S.C. § 441a(a)(2)(C).
2. Find reason to believe that the National Conservative Political Action Committee violated 2 U.S.C. § 441a(f).
3. Send attached letters.

Attachments

1. letter to NCPAC
2. letter to CFR
3. Audit report



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL

Becki A. Cecil, Treasurer
National Conservative Political
Action Committee
1500 Wilson Blvd.
Arlington, Va. 22209

Re: MUR 732 (78)

Dear Ms. Cecil:

On October , 1978, the Commission found reason to believe that The National Conservative Political Action Committee (NCPAC) violated the Federal Election Campaign Act of 1971, as amended, by accepting a contribution in-kind from a political committee in excess of the limit.

In particular, 2 U.S.C. § 441a(f) prohibits a political committee from knowingly accepting a contribution made in excess of the limits set out in 2 U.S.C. § 441a. NCPAC appears to have violated this provision when the Citizens for The Republic (CFR) made advance payments in connection with the Salute to Ronald Reagan fundraiser held on June 10, 1978, sponsored by NCPAC and CFR in an amount \$13,034.98 greater than the advance payments made by NCPAC for the fundraiser. Since NCPAC and CFR were required to share all expenses in connection with the fundraising effort, the additional payments by CFR of \$13,034.98 resulted in a contribution in-kind to NCPAC of \$6,517.49.

Under the Act, NCPAC has the opportunity to demonstrate that no action should be taken against it. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously; therefore, NCPAC's response should be

Page 2

Letter to: Becki A. Cecil, Treasurer

submitted within ten days after receipt of this notification. This matter will remain confidential in accordance with 2 U.S.C. § 437g(A)(3)(B) unless NCPAC notifies the Commission in writing that it wishes the investigation to be made public.

If NCPAC intends to be represented by counsel in this matter, Please have such counsel so notify us in writing. If NCPAC has any questions, please contact Robert Bogin, the staff attorney assigned to this matter, at (202)523-4004, at the Committee's earliest convenience. We have numbered this matter MUR 732(78).

Sincerely yours,

William C. Oldaker
General Counsel

78043074391



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Angela M. Buchanan, Assistant Treasurer
Citizens for The Republic
1253 - 7th Street, Suite 200
Santa Monica, California 90401

Re: MUR 732 (78)

Dear Ms. Buchanan:

On October , 1978, the Commission found reason to believe that The Citizens for The Republic (CFR) violated the Federal Election Campaign Act of 1971, as amended, by making a contribution in-kind to a political committee in excess of the limit.

In particular, 2 U.S.C. § 441a(a)(2)(C) prohibits a political committee from making a contribution to any other political committee in any calendar year which, in the aggregate, exceeds \$5,000. This limit appears to have been exceeded when CFR made advance payments in connection with the Salute to Ronald Reagan fundraiser held on June 10, 1978, sponsored by CFR and National Conservative Political Action Committee (NCPAC) in an amount \$13,034.98 greater than the advance payments made by NCPAC for the fundraiser. Since NCPAC and CFR were required to share all expenses in connection with the fundraising effort, the additional payments by CFR of \$13,034.98 resulted in a contribution in-kind to NCPAC from CFR of \$6,517.49.

Under the Act, CFR has the opportunity to demonstrate that no action should be taken against it. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously; therefore, CFR's response should be submitted within ten days after receipt of this notification.

Page 2

Letter to: Angela M. Buchanan, Assistant Treasurer

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(3)(B) unless CFR notifies the Commission in writing that it wishes the investigation to be made public.

If CFR intends to be represented by counsel in this matter, please have such counsel so notify us in writing. If CFR has any questions, please contact Robert Bogin, the staff attorney assigned to this matter, at (202)523-4004, at the Committee's earliest convenience. We have numbered this matter MUR 732(78).

Sincerely yours,

William Oldaker
General Counsel

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FEDERAL ELECTION COMMISSION

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

September 22, 1978

MEMORANDUM

TO : BILL OLDAKER

THROUGH : ORLANDO B. POTTER *OB.P.*
STAFF DIRECTOR

FROM : *RC* BOB COSTA/RICK HALTER

SUBJECT : NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE -
POSSIBLE VIOLATION OF SECTION 441a(a)(2)(C) OF
TITLE 2, UNITED STATES CODE

On June 9, 1977, the "Salute to Ronald Reagan" Dinner was held in Washington, D.C. This fundraising event was co-sponsored by the Citizens For The Republic 1/ (CFR) and the National Conservative Political Action Committee (NCPAC) 2/. This endeavor was characterized by both parties as a "joint fundraising" effort in communications with the Federal Election Commission, either via reports and statements filed for the public record or in conversations with the Audit staff during the course of the NCPAC audit.

CFR acted as the receiving and disbursing agent for the event and prepared the income statement and report schedules (see Exhibit A). A separate account was opened at the Santa Monica Bank, Santa Monica, California for the purpose of depositing contributions and making expenditures relating to this fundraising event. Apart from the income statement and attached report schedules, the only other information reviewed by the Audit staff was NCPAC's receipt and expenditure records through August 31, 1977. Neither the records of CFR nor any records of the separate account have been reviewed which relate to this joint fundraiser. However, we feel certain questions should be raised based on our analysis of the Committees' disclosure reports and statements filed with the Federal Election Commission.

- 1/ Formerly "Citizens For Reagan", principal campaign committee designated by Ronald Reagan for the 1976 Presidential primary campaign.
- 2/ Originally, the American Conservative Union was a participant in this joint fundraising effort, but later withdrew.



Section 441a(a)(5)(A) of Title 2, United States Code and Section 110.3(a)(2)(i) of the Commission's Regulations state, in relevant part, that political committees engaged in joint fundraising may make unlimited transfers of funds so raised. Since the Act and the Commission's Regulations do not further address the subject of joint fundraising, the general principles set forth in AO 1977-8 and AO 1977-14 may be viewed as Commission policy concerning the recordkeeping and reporting requirements for joint fundraising activities undertaken by candidates and/or committees (see Exhibits B and C).

On May 27, 1977, the Audit staff provided NCPAC with copies of the above mentioned AO's and also offered to assist the Committee with regard to any questions concerning the event and the resultant recordkeeping and reporting requirements. We were informed by a NCPAC official that CFR had decided how to do it and NCPAC had to go along. (See note 5/ on following page)

DISCUSSION - ALLOCATION OF COSTS OF THE EVENT

Advisory Opinion 1977-8, page 4, specifically addresses the question of advance payments to defray expenses of the event as follows:

"Any advance payments made by the Rowland Committee to defray expenses of the event would be loans or advances and thus contributions to the Sasser Committee (and counted against the Act's contribution limits), unless (1) the Sasser Committee itself funded 20 percent of any advance payments needed or (2) the 20 percent Sasser share was \$500.00 or less and distribution of net proceeds to the Sasser Committee was made within 60 days of the date of the advance. 5/ See Section 104.2(b)(11) and Section 104.8(b) of the Regulations."

In the case of the "Salute to Ronald Reagan" joint fundraiser, our review of the reports filed by NCPAC and CFR revealed that advance payments were apparently made by both Committees; however apparently not in the same proportion as the agreed division (50% - 50%) of the net proceeds. 3/

3/ We were unable to determine the amount, if any, of advance payments made from contributions received and deposited into the fundraiser account before the June 9, 1977 event or whether those contributions were charged against the relevant limitations of their donors vis-a-vis the Committees. However, we were able to determine that approximately \$9,550.00 was reported as being received on or before June 9, 1977 per the Schedule A's (see Exhibit A).

As indicated on Exhibit D, even if it is assumed that all of the reimbursement attributed to NCPAC was for advance payments, NCPAC's proportionate share 4/ of advance payments falls short by \$6,517.49 (\$7,819.41 less \$1,301.92). This amount (\$6,517.49), in the opinion of the Audit staff, represents a loan vis-a-vis a contribution to NCPAC from CFR apparently in excess of the \$5,000 contribution limit contained in 2 U.S.C. 441a(a)(2)(C).

During the exit conference, NCPAC was advised of certain reporting problems, such as: an understatement in total receipts and expenditures, missing occupation and principal place of business information, and missing aggregate year to date totals for contributors; however, NCPAC responded that they would await a formal request from the Commission prior to making the suggested changes. The subject matter of amending action by NCPAC will be addressed in the audit letter, along with the question of excessive contributions, if appropriate.

This matter is being forwarded to your office for consideration and any action which you may deem appropriate. Should you have any questions, please do not hesitate to contact Rick Halter on extension 3-4155.

4/ $\$14,336.90 \text{ (CFR)} + \$1,301.92 \text{ (NCPAC-assumed)} = \$15,638.82$
total advance payments pre-6/10/77. Therefore, 50% of
 $\$15,638.82 = \$7,819.41$.

5/ In subsequent conversation with a NCPAC official, we were informed again that CFR handled the event and NCPAC filed the statements prepared by CFR and have no further information on the matter.

Attachments as stated



FEDERAL ELECTION COMMISSION

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

September 22, 1978

MEMORANDUM

TO : BILL OLDAKER

THROUGH : ORLANDO B. POTTER *OBP.*
STAFF DIRECTOR

FROM : *RC* BOB COSTA/RICK HALTER

SUBJECT : NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE -
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78040074398

As indicated on Exhibit D, even if it is assumed that all of the reimbursement attributed to NCPAC was for advance payments, NCPAC's proportionate share 4/ of advance payments falls short by \$6,517.49 (\$7,819.41 less \$1,301.92). This amount (\$6,517.49), in the opinion of the Audit staff, represents a loan vis-a-vis a contribution to NCPAC from CFR apparently in excess of the \$5,000 contribution limit contained in 2 U.S.C. 441a(a)(2)(C).

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Attachments as stated

Exhibit A

SALUTE TO RONALD REAGAN DINNER

JUNE 9, 1977 - WASHINGTON, D.C.

The "Salute to Ronald Reagan" Dinner was a fundraising event co-sponsored by National Conservative Political Action Committee and Citizens for the Republic. All contributions and expenses, as well as the proceeds have been divided equally between these two organizations. A complete accounting follows.

398430074400

Source: Addendum to NCPAC's 9/10/77 REPORT.

SALUTE TO RONALD REAGAN DINNER
JUNE 9, 1977 - WASHINGTON, D.C.

INCOME STATEMENT

7870400371413071

TOTAL RECEIPTS (SEE SCHEDULE A)	\$47,805.00
TOTAL EXPENSES (SEE SCHEDULE B)	\$24,287.49
NET PROFIT FROM FUNDRAISER	<u>\$23,517.51</u>

SHARE OF PROFIT

CFTR	\$11,758.75
NCPAC	<u>\$11,758.76</u>
	<u>\$23,517.51</u>

SCHEDULE A

"SALUTE TO RONALD REAGAN" DINNER RECEIPTS

<u>Date</u>	<u>Name</u>	<u>Amount</u>	<u>50% CFTR</u>	<u>50% NCPAC</u>
6/28/77	National Sheep Industry Committee for Good Government 1776 F St., N.W., #5 Washington, D. C. 20006	\$100.00	\$ 50.00	\$ 50.00
6/28/77	Committee for Thorough Agri- cultural Political Education P. O. Box 32287 San Antonio, Texas 78284	5,000.00	2,500.00	2,500.00
6/24/77	Gas Employees Political Action Committee 1150 Connecticut Ave., N.W., 12th Washington, D.C. 20036 Floor	50.00	25.00	25.00
6/24/77	Burlington Northern Employees Voluntary Good Government Fund East Fifth St. St. Paul, Minnesota 55101	200.00	100.00	100.00
6/21/77	Special Political Agricultural Community Education 609 Portland Bldg. 200 West Broadway Louisville, Kentucky 40202	300.00	150.00	150.00
6/21/77	Agricultural & Dairy Educa- tional Political Trust Box 1837, S.S.S. Springfield, Mo. 65805	2,000.00	1,000.00	1,000.00
6/17/77	Johns Manville Political Action Committee Suite 214, 1025 Conn. Ave., NW Washington, D. C. 20036	100.00	50.00	50.00
6/17/77	Committee Organized for the Trading of Cotton 1707 L St., NW, Suite 460 Washington, D. C. 20036	500.00	250.00	250.00
6/13/77	The Fund for a Conservative Majority P. O. Box 17416 Washington, D. C. 20041	300.00	150.00	150.00
6/13/77	Public Service Political Action Committee 8230 Old Courthouse Rd., Suite 430 Vienna, Virginia 22180	300.00	150.00	150.00

Salute to Ronald Reagan Dinner Receipts

Page 2

<u>Date</u>	<u>Name</u>	<u>Amount</u>	<u>50% CFTR</u>	<u>50% NCPAC</u>
6/ 9/77	The Committee for the Survival of a Free Congress 6 Library Court, SE Washington, D. C. 20003	\$200.00	\$100.00	\$100.00
7/11/77	Mrs. Leland Speer 910 N. Washington Blvd. Kansas City, Kansas 66102	25.00	12.50	12.50
7/11/77	Mr. Paul E. Pellett Iowa Chemical Corp. 3rd & Walnut St. Atlantic, Iowa 50022	100.00	50.00	50.00
7/11/77	Mr. Harry B. Mathews, III 7701 Forsyth Blvd., Suite 1038 Clayton, MO 63105	200.00	100.00	100.00
7/11/77	Mr. Patrick Gorman 1706 Westminster Way Annapolis, MD 21401	300.00	150.00	150.00
5/25/77	Richard A. Viguerie	1,200.00	600.00	600.00
6/30/77	6033 Crimson Court	50.00	25.00	25.00
7/11/77	McLean, VA 22101	50.00	25.00	25.00
6/28/77	Harold Ransburg Ransburg Corporation P. O. Box 88220 Indianapolis, Ind. 46208	100.00	50.00	50.00
6/28/77	Vrem D. Levens 8601 Delmar Lane Prairie Village, Kan. 66207	250.00	125.00	125.00
6/28/77	Frank B. Vandegrift 2900 Verona Road Shawnee Mission, Kansas 66208	150.00	75.00	75.00
6/24/77	M. P. Robbins Weston, Vermont 05161	50.00	25.00	25.00
6/24/77	Danny Ellis 606 Fairway Fort Scott, Kan. 66701	1,000.00	500.00	500.00
6/21/77	R. B. Sharp P. O. Box 344 Natchez, Miss. 39120	100.00	50.00	50.00
6/21/77	Howard B. Keck P. O. Box 1521 Houston, Texas 77001	300.00	150.00	150.00

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Salute to Ronald Reagan Dinner Receipts

<u>Date</u>	<u>Name</u>	<u>Amount</u>	<u>50% CFTR</u>	<u>50% NCPAC</u>
6/21/77	J. A. Mull, Jr. 415 Page Court - 220 W. Douglas Wichita, Kansas 67202	\$250.00	\$125.00	\$125.00
6/21/77	Ethel Pew Old Gulph Road & Morris Ave. Bryn Mawr, Pa. 19010	200.00	100.00	100.00
6/21/77	Daniel P. Hays South Road Harbor Acres Port Washington, N. Y. 10056	200.00	100.00	100.00
6/17/77	Ferdinand L. Mayer Bennington, Vermont 05201	100.00	50.00	50.00
6/17/77	Bertha J. Landreth 3695 Linden Ave., Apt. 1-B Long Beach, CA 90807	35.00	17.50	17.50
6/17/77	Inman Brandon 3300 First Natl. Bank Tower Atlanta, Georgia 30303	200.00	100.00	100.00
6/17/77	Margaret Meyers Ressegieu 1220 Toluca Avenue Alliance, Nebraska 69301	25.00	12.50	12.50
6/17/77	E. Alexander Louis 645 N. Wren Palatine, IL 60067	100.00	50.00	50.00
6/17/77	James H. Lake 1747 Pa. Ave., N.W. Washington, D. C. 20036	100.00	50.00	50.00
6/17/77	Marcella Richardson 4545 Connecticut Ave. #712 Washington, D.C. 20008	200.00	100.00	100.00
6/17/77	James M. Cannon c/o Senate Minority Leader United States Senate Washington, D.C. 20510	200.00	100.00	100.00
6/17/77	Frank Butterworth, Jr. Tuttle Avenue Mount Carmel, Conn. 06518	100.00	50.00	50.00
6/17/77	Howard H. Baker, Jr. Huntsville, Tenn. 37756	200.00	100.00	100.00
6/17/77	Geo. F. Baker, Jr. Centre Island Oyster Bay, NY 11771	1,000.00	500.00	500.00

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Salute to Ronald Reagan Dinner Receipts

Page 4

<u>Date</u>	<u>Name</u>	<u>Amount</u>	<u>50% CFTR</u>	<u>50% NCPAC</u>
6/17/77	Emily Woodruff 1941 Stark Ave. Columbus, GA 31906	\$400.00	\$200.00	\$200.00
6/17/77	H. H. Hurt 204 E. Joppa Rd., Apt. 610 Towson, Maryland 21204	150.00	75.00	75.00
6/17/77	Hon. James Abdnor, M.C. 1224 House Office Bldg. Washington, D. C. 20515	150.00	75.00	75.00
6/17/77	Howard W. Taylor 15 Scenic Dr. Warwick, R. I. 02886	100.00	50.00	50.00
6/17/77	Paul H. Nisbet 1694 Beulah Road Vienna, VA 22180	300.00	150.00	150.00
6/17/77	Fielding W. Yost 439 Ferry Point Road Annapolis, Maryland 21403	1,000.00	500.00	500.00
6/17/77	Douglas Exline 126 West Hillside Terrace Salina, Kansas 67401	200.00	100.00	100.00
6/17/77	S. Dean Evans, Sr. Salina, Kansas 67401	1,500.00	750.00	750.00
6/17/77	Dianne D. McClary 58 Queen Ann Bridge Rd. Upper Marlboro, Md. 20870	100.00 100.00	50.00 50.00	50.00 50.00
6/17/77	Wm. H. Graves 400 Upper Mill Drive Salina, Kansas 67401	500.00	250.00	250.00
6/17/77	Richard C. Wing P. O. Box 878 Salina, Kansas 67401	100.00	50.00	50.00
6/17/77	Norman S. Bressler 2102 Brookwood Salina, Kansas 67401	100.00	50.00	50.00
6/17/77	Sam Evans 740 Highland Salina, Kansas 67401	1,000.00	500.00	500.00

Salute to Ronald Reagan Dinner Receipts

Page 5

<u>Date</u>	<u>Name</u>	<u>Amount</u>	<u>50% CFTR</u>	<u>50% NCPAC</u>
6/17/77	Dwayne C. Larson 2029 Starlight Drive Salina, Kansas 67401	\$100.00	\$ 50.00	\$ 50.00
6/17/77	Phyllis H. Lynch 300 W. Park Lane Salina, Kansas 67401	200.00	100.00	100.00
6/17/77	Milton L. Morrison 534 Upper Mill Salina, Kansas 67401	1,000.00	500.00	500.00
6/17/77	Tom W. Hampton 22 Crestview Drive Salina, Kansas 67401	200.00	100.00	100.00
6/17/77	Robert D. Smith 100 Millview Salina, Kansas 67401	100.00	50.00	50.00
6/17/77	John R. Norlin 735 E. Leslie Salina, Kansas 67401	100.00	50.00	50.00
6/17/77	Frank C. Norton 215 S. Santa Fe Salina, Kansas 67401	100.00	50.00	50.00
6/17/77	Gary D. Ray Box 1645 Salina, Kansas 67401	100.00	50.00	50.00
6/17/77	Roger Wilbur 521 Sunset Dr. Salina, Kansas 67401	100.00	50.00	50.00
6/17/77	Mrs. Maxine Wilson 933 Sunrise Dr. Salina, Kansas 67401	100.00	50.00	50.00
6/17/77	Ralph E. Reitz 140 Mt. Barbara Salina, Kansas 67401	100.00	50.00	50.00
6/17/77	W. A. Sauder 2136 Raymond Salina, Kansas 67401	100.00	50.00	50.00
6/17/77	Kenneth Wright 136 Overhill Salina, Kansas 67401	200.00	100.00	100.00

Salute to Ronald Reagan Dinner Receipts

Page 6

<u>Date</u>	<u>Name</u>	<u>Amount</u>	<u>50% CFTR</u>	<u>50% NCPAC</u>
6/17/77	Robert R. Frisbie 1318 Parkwood Dr. Salina, Kansas 67401	\$100.00	\$ 50.00	\$ 50.00
6/17/77	George L. Frisbie Gypsum, Kansas 67448	250.00	125.00	125.00
6/17/77	Ben E. Vidricksen 1314 Sunrise Drive Salina, Kansas 67401	100.00	50.00	50.00
6/17/77	M. Lester Jepsen 18018 Jersey Ave. Artesia, CA 90701	100.00	50.00	50.00
6/17/77	L. N. Dunnivant Suite 1480, Midland National Bank Tower Midland, Texas 79701	100.00	50.00	50.00
6/17/77	Isabella Blaney Rt. 4, 5356 E. Lacy Rd. Madison, Wis. 53711	25.00	12.50	12.50
6/17/77	Augusta H. Petrone Dublin, N. H. 03444	200.00	100.00	100.00
6/17/77	Senator Jesse Helms c/o North Carolina Congressional P. O. Box 18348 Club Raleigh, N. C. 27609	200.00	100.00	100.00
6/17/77	John E. W. Baay, M. D. 3200 Hayden Amarillo, Texas 79109	100.00	50.00	50.00
6/17/77	Clinton Engstrand 816 Union Center Bldg. Wichita, Kan. 67202	100.00	50.00	50.00
6/17/77	Howard H. McClintic, Jr. Gulfstream Delray Beach, Fla. 33444	100.00	50.00	50.00
6/17/77	Ruth S. Steiger 645 Wisconsin St. Oshkosh, Wis. 54901	100.00	50.00	50.00
6/17/77	Ann S. Van Vechten 59 Shrowsbury Dr. Rumson, N. J. 07760	100.00	50.00	50.00
6/17/77	Keith B. Bright P. O. Box 517 Independence, CA 93526	100.00	50.00	50.00

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Salute to Ronald Reagan Dinner Receipts

<u>Date</u>	<u>Name</u>	<u>Amount</u>	<u>50% CFTR</u>	<u>50% NCPAC</u>
6/17/77	Kenneth H. Dahlberg 19360 Walden Trail Wayzata, Minn. 55391	\$100.00	\$ 50.00	\$ 50.00
6/17/77	Robert K. Gray 2146 N. Courthouse Rd. Arlington, VA 22201	100.00	50.00	50.00
6/17/77	Emily M. Boylston 2000 S. Ocean Blvd., Apt. 2B Pompano Beach, Fla. 33062	150.00	75.00	75.00
6/17/77	Herbert N. Morgan P. O. Box 846 Arlington, VA 22216	100.00	50.00	50.00
6/17/77	L. W. Bonsib, Jr. Box 1807 Washington, D. C. 20013	200.00	100.00	100.00
6/17/77	Ted Welch 104 Westhampton Place Nashville, Tenn. 37205	100.00	50.00	50.00
6/17/77	L. E. Thomas P. O. Box 490 Panama City, Florida 32401	300.00	150.00	150.00
6/17/77	Patrick E. O'Donnell 4213 Rosemary Street Chevy Chase, Md. 20015	100.00	50.00	50.00
6/17/77	Dan Stringer c/o Pollard Stringer & Co. 9409 Erooke Dr. Bethesda, Md. 20034	100.00	50.00	50.00
6/17/77	Paul Arneson 1826 Wyoming Avenue Washington, D. C. 20009	200.00	100.00	100.00
6/17/77	Tim R. Crawford 4002 38th Place, North Arlington, VA 22207	200.00	100.00	100.00
6/17/77	Nancy Clark Reynolds 126 Quay Street Alexandria, VA 22314	100.00	50.00	50.00
6/17/77	Willard E. Loesch 754 Pilgrim Ave. Trenton, N. J. 08648	200.00	100.00	100.00

SCHEDULE A

Salute to Ronald Reagan Dinner Receipts

Page 8

<u>Date</u>	<u>Name</u>	<u>Amount</u>	<u>50¢ CFTR</u>	<u>50¢ NCPAC</u>
6/17/77	B. Jay Baraff 1425 K Street Washington, D. C. 20005	\$100.00	\$ 50.00	\$ 50.00
6/17/77	Alice E. Allen 3 Getz Avenue Trenton, N. J. 08619	100.00	50.00	50.00
6/17/77	M. E. Moses P. O. Box 24585 Dallas, Texas 75224	100.00	50.00	50.00
6/17/77	Kathleen C. Parriott 2545 East 31st St. Tulsa, Okla. 74105	100.00	50.00	50.00
6/17/77	A. A. Seeligson, Jr. 1604 Natl. Bank of Commerce Bldg. San Antonio, Texas 78205	100.00	50.00	50.00
6/17/77	David Fasken P. O. Box 121 Ross, CA 94957	100.00	50.00	50.00
6/17/77	Scott Bair c/o Development Co. of America Box 520 Westminster, Md. 21157	150.00	75.00	75.00
6/13/77	M. J. Mintz 2101 L St., NW Washington, D. C. 20037	100.00	50.00	50.00
6/13/77	Arthur D. Welton Tredaven Avenue Oxford, Maryland 21654	200.00	100.00	100.00
6/13/77	Elizabeth N. Robb 6 Rockledge Road Wheeling, W. Va. 26003	100.00	50.00	50.00
6/13/77	Henry M. Buchanan 4706 Highland Avenue Bethesda, Maryland 20014	100.00	50.00	50.00
6/13/77	George W. Kinney 4906 Fauquoit Lane Annandale, VA 22003	100.00	50.00	50.00
6/13/77	Elizabeth K. Zoch 1600 The 600 Building Corpus Christi, Texas 78401	100.00	50.00	50.00

Salute to Ronald Reagan Dinner Receipts

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<u>Date</u>	<u>Name</u>	<u>Amount</u>	<u>50% CFTR</u>	<u>50% NCPAC</u>
6/13/77	Louise Tompkins Smith 2700 Virginia Avenue, NW Washington, D. C. 20037	\$300.00	\$150.00	\$150.00
6/13/77	Olga Pirogowa	100.00	50.00	50.00
6/13/77	61 Miami Trail White Meadow Lake Rockaway, N. J. 07866	100.00	50.00	50.00
6/13/77	Dan W. Lufkin 630 Oakwood Ave. West Hartford, Conn. 06110	1,000.00	500.00	500.00
6/13/77	Miss Katherine R. Gambel 1940 Metairie Road Metairie, LA 70005	100.00	50.00	50.00
6/13/77	Jaquelin E. Taylor 409 Southern States Bldg. Richmond, VA 23219	300.00	150.00	150.00
6/13/77	Mrs. Mary L. Crossman 208 Hamlet Hills Chagrin Falls, Ohio 44022	50.00	25.00	25.00
6/13/77	John C. Oliver, Jr. 2205 Oliver Bldg. Pittsburgh, PA 15222	200.00	100.00	100.00
6/13/77	E. A. Morris P. O. Box 21488 Greensboro, N. C. 27420	100.00	50.00	50.00
6/13/77	Eugene L. Pearce, Jr. 16 South Rhodes Center NW Atlanta, Georgia 30309	25.00	12.50	12.50
6/13/77	Richard L. Shields 923 East Second Russell, Kansas 67665	300.00	150.00	150.00
6/13/77	Wray E. Bradley, Col. P. O. Drawer 8670 Anchorage, Alaska 99508	150.00	75.00	75.00
6/13/77	Donald L. Alexander 2800 Central Trust Tower Cincinnati, Ohio 45202	25.00	12.50	12.50
6/13/77	Mary A. O'Brien Route No. 3 Wilmington, Ill. 60481	100.00	50.00	50.00

SCHEDULE A

Salute to Ronald Reagan Dinner Receipts

Page 10

<u>Date</u>	<u>Name</u>	<u>Amount</u>	<u>50% CFTR</u>	<u>50% NCPAC</u>
6/13/77	G. Douglas Hofe, Jr. Box 222 South Orange, N. J. 07079	\$200.00	\$100.00	\$100.00
6/13/77	Mrs. Estelle Rubarth 2522 Lowrey Dr. Gatesville, Texas 76528	50.00	25.00	25.00
6/13/77	Maybelle C. Shank 132 Clayton Avenue Waynesboro, PA 17268	100.00	50.00	50.00
6/13/77	Dr. Edward F. Woods 231 Jerusalem Road Cohasset, Mass. 02025	25.00	12.50	12.50
6/13/77	Howard J. Hawkins 3660 Genhurst Ave. St. Louis Park, Minn. 55416	10.00	5.00	5.00
6/13/77	Frieda Wittwer Route 1, Box 185-A Bayside, California 95524	200.00	100.00	100.00
6/13/77	Ruth E. Smith 2474 Elden Ave., Apt. A Costa Mesa, CA 92627	10.00	5.00	5.00
6/13/77	Clyde G. Culbertson, M.D. R. R. No. 4 Nashville, Ind. 47448	100.00	50.00	50.00
6/13/77	R.P.A. Everard P. O. Box 99234 Seattle, Wash. 98199	200.00	100.00	100.00
6/13/77	Wanda Rand Route 1 Goffstown, N. H. 03045	50.00	25.00	25.00
6/13/77	Mrs. St. John Garwood 1802 San Gabriel Austin, Texas 78701	100.00	50.00	50.00
6/13/77	Arthur Cary 2519 Farrington St. Dallas, Texas 75207	100.00	50.00	50.00
6/13/77	Esther S. K. Roberts Round Hill Road Greenwich, Conn. 06830	100.00	50.00	50.00

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SCHEDULE A

Salute to Ronald Reagan Dinner Receipts

Page 11

<u>Date</u>	<u>Name</u>	<u>Amount</u>	<u>50% CFTR</u>	<u>50% NCPAC</u>
6/13/77	Ada W. Ausplund 2870 N.W. Cornell Road * * Portland, Oregon 97210	\$100.00	\$ 50.00	\$ 50.00
6/13/77	Hugh E. Palmer P. O. Box 2564 Billings, Montana 59103	200.00	100.00	100.00
6/13/77	Charles H. Breecher 113 Columbia Ave. Rehoboth Beach, De. 19971	150.00	75.00	75.00
6/13/77	C. S. Harding Mott 500 Mott Foundation Bldg. Flint, Michigan 48502	1,000.00	500.00	500.00
6/13/77	G. F. Callahan, Jr. 85 Helen Street McKees Rocks, PA. 15136	100.00	50.00	50.00
6/13/77	Roy S. Wilson P. O. Box 336 Woodlake, CA 93286	100.00	50.00	50.00
6/13/77	J. S. Hudnall 630 Citizens Bank Bldg. Tyler, Texas 75701	1,000.00	500.00	500.00
6/13/77	Glenn C. Ferguson P. O. Bin 2427 Bakersfield, CA 93303	200.00	100.00	100.00
6/13/77	Evelyn S. Egtvedt 3146 Lakewood Ave., S. Seattle, Washington 98144	50.00	25.00	25.00
6/13/77	Terry John Wall 2011 Neosho Shawnee Mission, Kansas 66205	100.00	50.00	50.00
6/13/77	Richard Harvey P. O. Box 446 Tyler, Texas 75710	100.00	50.00	50.00
6/13/77	W. H. Ellifrits 108 High St. Strasburg, VA 22657	50.00	25.00	25.00
6/13/77	Earl E. T. Smith 1021 N. Ocean Blvd. Palm Beach, Fla. 33480	1,000.00	500.00	500.00

Salute to Ronald Reagan Dinner Receipts

<u>Date</u>	<u>Name</u>	<u>Amount</u>	<u>50% CFTR</u>	<u>50% NCPAC</u>
6/13/77	Tatnall Lea Hillman 422 Belrose Lane Radnor, PA 19087	\$1,000.00	\$500.00	\$500.00
6/13/77	Ellen K. Ogle 510 Lido Drive Ft. Lauderdale, Florida 33301	1,000.00	500.00	500.00
6/ 9/77	David A. Keene 814 South Lee St. Alexandria, VA 22314	100.00	50.00	50.00
6/ 9/77	Ovide E. De St. Aubin Mortam Acres, Route 3 Siler City, N. C. 27344	200.00	100.00	100.00
6/ 9/77	William M. Acker, Jr. 2504 Watkins Circle Birmingham, Alabama 35223	150.00	75.00	75.00
6/ 9/77	Marie L. K. Willison 4710 Hill Top Lane, Indian Hill Cincinnati, Ohio 45253	100.00	50.00	50.00
6/ 9/77	Stella Alexandrowicz 754 Pilgrim Avenue Trenton, N. J. 08648	25.00 200.00	12.50 100.00	12.50 100.00
6/ 9/77	John T. Benjamin Long Point Farm Oxford, Maryland 21654	100.00	50.00	50.00
6/ 2/77	Nancy Avery Follansbee 800 Andorra Road Lafayette Hill, PA 19444	1,000.00	500.00	500.00
6/ 2/77	Frank M. Klant 411 Barton Avenue Terre Haute, Indiana 47603	100.00	50.00	50.00
6/ 2/77	Glee McClanahan Box 753 Grundy, Virginia 24614	25.00	12.50	12.50
6/ 2/77	F. E. Morgan Grundy, Virginia 24614	100.00	50.00	50.00
6/ 2/77	Harold James Route 5, Box 831 Prescott, Arizona 86301	100.00	50.00	50.00

Salute to Ronald Reagan Dinner Receipts

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<u>Date</u>	<u>Name</u>	<u>Amount</u>	<u>50% CFTR</u>	<u>50% NCPAC</u>
6/ 2/77	Malcolm A. Schweiker Worcester, PA 19490	\$300.00	\$150.00	\$150.00
6/ 2/77	Mrs. Leslie Wikle Fairview, Kansas 66425	100.00	50.00	50.00
6/ 2/77	John C. Mason Rt. No. 2 Millersburg, Ohio 44654	300.00	150.00	150.00
6/ 2/77	Ann S. Van Vechten 59 Shrowsbury Drive Rumson, N. J. 07760	200.00	100.00	100.00
6/ 2/77	Mrs. Norman E. Morgan Grundy, VA 24614	50.00	25.00	25.00
6/ 2/77	E. Leah Ransburg 4000 N. Meridian St. Tarkington Towers, Apt. 8H Indianapolis, Ind. 46208	100.00	50.00	50.00
6/ 2/77	Mrs. Max Pray 122 Kings Road Palm Beach, Fla. 33480	200.00	100.00	100.00
6/ 2/77	Lawrence Lewis, Jr. P.O. Box 432 Richmond, Virginia 23203	200.00	100.00	100.00
6/ 2/77	Herman M. Schnurr 18 Country Shire Drive Rochester, N. Y. 14626	100.00	50.00	50.00
6/ 2/77	James L. Dixon 1225 Connecticut Ave., NW Washington, D. C. 20036	100.00	50.00	50.00
6/ 2/77	Zena G. Holman 769 Lighthouse Ave. Pacific Grove, CA 93950	100.00	50.00	50.00
6/ 2/77	Carmen H. Burkhardt 57 S. Berkshire Road Bloomfield Hills, MI 48013	300.00	150.00	150.00
6/ 2/77	Mrs. Jean R. Knerr 502 Dogwood Lane Conshohocken, PA 19428	100.00	50.00	50.00
6/ 2/77	Irene Peterson 29539 Lorelli Dr. Barstow, CA 92311	500.00	250.00	250.00

Salute to Ronald Reagan Dinner Receipts

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<u>Date</u>	<u>Name</u>	<u>Amount</u>	<u>50% CFTR</u>	<u>50% NCPAC</u>
6/ 2/77	Mrs. Clive Runnells (Mary) 333 N. Mayflower Road Lake Forest, Illinois 60045	\$100.00	\$ 50.00	\$ 50.00
6/ 2/77	Sherman Thomas 25810 Avenue 11 Madera, CA 93637	100.00	50.00	50.00
5/25/77	Charles Martin 1131 Alta Loma Road Los Angeles, CA 90069	150.00	75.00	75.00
5/25/77	John W. Uhlmann 8221 Hall Shawnee Mission, Kan. 66208	100.00	50.00	50.00
5/25/77	John D. Marsh 6305 Catharpin Road Gainesville, VA 22065	300.00	150.00	150.00
7/5/77	Contribution Refunded	(300.00)	(150.00)	(150.00)
5/25/77	Harry G. Gianakon 109 Quaker Lane Haverford, Penna. 19041	300.00	150.00	150.00
5/25/77	Mrs. Dan Gerber, Sr. Box 31 Fremont, Michigan 48412	100.00	50.00	50.00
5/25/77	A. K. Tigrett 1111 Army Navy Dr. Arlington, VA 22202	100.00	50.00	50.00
5/25/77	F. A. Lennon Daisy Hill Farm Chagrin Falls, Ohio 44022	100.00	50.00	50.00
5/25/77	Carleton Putnam 1465 Kirby Road McLean, VA 22101	100.00	50.00	50.00
5/25/77	Mrs. Rutherford Bingham 65 Commonwealth Ave. Boston, Mass. 02116	50.00	25.00	25.00
5/25/77	B. P. Bole, Jr. Rt. 1, 9446 Sperry Rd. Mentor, Ohio 44060	100.00	50.00	50.00
5/25/77	John R. Quinn 5611 Holt Avenue Los Angeles, CA 90056	100.00	50.00	50.00

Salute to Ronald Reagan Dinner RECEIPTS

Page 15

<u>Date</u>	<u>Name</u>	<u>Amount</u>	<u>50% CFTR</u>	<u>50% HCPAC</u>
5/25/77	Doris Ann Warner 502 Park Avenue New York, N. Y. 10022	\$300.00	\$150.00	\$150.00
5/25/77	Natalie Lincoln	100.00	50.00	50.00
6/ 9/77	4201 Cathedral Ave. Washington, D. C. 20016	100.00	50.00	50.00
5/25/77	Eleanor Ring Storrs 801 Tolita Avenue Coronado, CA 92118	300.00	150.00	150.00
5/25/77	John B. Conlan, Jr. 1700 Pennsylvania Ave., NW Washington, D. C. 20006	300.00	150.00	150.00
5/25/77	W. P. Tyrrell Belmond, Iowa 50421	100.00	50.00	50.00
5/25/77	Sherman Chickering 864 Francisco Street San Francisco, CA 94109	100.00	50.00	50.00
5/25/77	Mrs. John C. Lincoln (Helen) Scottsdale House No. 359 4800 North 68th St. Scottsdale, Arizona 85512	100.00	50.00	50.00
5/25/77	Barron K. Grier 4502 North 32nd Road Arlington, VA 22207	300.00	150.00	150.00
5/25/77	Maxy Pope Alles 1316 West Haven Road San Marino, CA 91108	100.00	50.00	50.00
7/19/77	Richard F. Reinke Box 566 Deshler, NE 68340	100.00	50.00	50.00
7/21/77	Cecil van Asch van Wyck 925 Via Rosita, Hope Ranch Santa Barbara, CA 93110	100.00	50.00	50.00
TOTAL CASH RECEIPTS		\$47,605.00	\$23,802.50	\$23,802.50

Salute to Ronald Reagan Dinner Receipts

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IN - KIND

<u>Date</u>	<u>Name</u>	<u>Amount</u>	<u>50% CFTR</u>	<u>50% NCPAC</u>
6/9/77	Angelo Bonita 4515 Willard Avenue Chevy Chase, Maryland 20015	\$200.00	\$100.00	\$100.00
TOTAL RECEIPTS		<u>\$47,805.00</u>	<u>\$23,902.50</u>	<u>\$23,902.50</u>

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SALUTE TO RONALD REAGAN DINNER, WASHINGTON, D.C.JUNE 10, 1977EXPENDITURES

	<u>Purpose</u>	<u>Date</u>	<u>Amount</u>
Hyatt Regency	Banquet expense	6/ 9/77	\$ 1,092.00
P.O. Box 992	Banquet expense	6/10/77	514.16
Washington, D.C. 20044	Rooms	6/10/77	749.53
	Rooms	6/30/77	47.14
Ralph Graves Production	Music for	6/13/77	250.00
4323 Warren St., N.W.	banquet		
Washington, D.C. 20016			
Bay Area Travel, Inc.	Air travel	6/15/77	1,422.00
631 Wilshire Blvd.	expense		
Santa Monica, CA 90401			
Scott & Scott	Printing	6/15/77	302.61
2944 Colorado Ave.			
Santa Monica, CA 90404			
Airborne	Delivery expense	6/15/77	15.11
P. O. Box 662		6/28/77	13.46
Seattle, WA 98111			
Rose Marie Monk	Reimbursed park-	6/23/77	67.50
5900 Canterbury, #B314	ing, cabs, food,		
Culver City, CA 90230	& other misc. ex-		
	penses related to		
	DC. Banquet		
Flowers by Angelo, Inc.	Flowers	6/28/77	80.00
P.O. Box 39077			
Washington, D.C. 20016			
Metro Computing, Inc.	Mailgrams	6/28/77	276.80
1405 G St., NW, Mezzanine			
Washington, D.C. 20005			
Franklyn Nofziger	Reimbursed park-	6/29/77	39.00
12012 Goshen, #310	ing, cabs, food,		
West Los Angeles, CA 90049	& other misc. ex-		
	penses related to		
	DC banquet.		
Citizens for the Republic	Reimbursed for ban-	6/30/77	17,493.03
1253 7th St., #200	quet expenses,		
Santa Monica, CA 90401	postage, printing,		
	telephone, air fare,		
	& other expenses re-		
	lated to DC banquet.		
	Telephone expense		
	overcharged re-	7/14/77	(33.62)
	funded		

SCHEDULE B

Salute to Ronald Reagan Dinner - Expenditures

Page 2

	<u>Purpose</u>	<u>Date</u>	<u>Amount</u>
Katherine Anderson 828 So. Lee St. Alexandria, VA 22314	Reimbursed for parking, postage, & stationery ex- penses	6/30/77	\$ 30.68
Charles Martin & Associates 6363 Sunset Blvd. Los Angeles, CA 90028	Advertising ex- pense	7/11/77	180.00
National Conservative PAC 1500 Wilson Blvd., Arlington, VA 22209	Reimbursed dinner expenses-incl. telephone, mail- gram, xerox, printing	7/13/77	1,301.92
Paul A. Russo 310 First St., S.E. Washington, D.C. 20003	Reimbursed car rental, tips, misc. expenses for dinner	7/13/77	61.77
Auto Clerk Services 7060 Hollywood Blvd. Hollywood, CA 90028	Typing of thank you letters	7/19/77	42.40
Western Union Telegraph Co. P.O. Box 26208 Richmond, VA 23260	Telegrams	8/1/77	140.00
TOTAL CASH EXPENSES			<u>\$24,087.49</u>
Angelo Bonita 4515 Willard Avenue Chevy Chase, MD 20015	"In-kind" - Flowers	6/9/77	200.00
TOTAL EXPENSES			<u>\$24,287.49</u>
<u>SHARE OF EXPENSES</u>			
CFTR (50%)			\$12,143.75
NCPAC (50%)			<u>12,143.74</u>
			<u>\$24,287.49</u>



FEDERAL ELECTION COMMISSION

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

May 25, 1977

AO 1977-8

W. Gary Blackburn, Esquire
Ortale, Kelley, Herbert & Crawford
Twenty-Third Floor
Life and Casualty Tower
Nashville, Tennessee 37219

Dear Mr. Blackburn:

This refers to your letter of February 16, 1977, as supplemented by a letter dated April 6, 1977, which requests an advisory opinion on behalf of the Sasser for Senate Committee concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act"), to the receipt of proceeds from a joint fundraiser held with the principal campaign committee of Mr. Mike Rowland, a candidate for the United States House of Representatives.

As stated in your letters the two committees agreed to participate in a joint fundraising event held on January 15, 1977, for the purpose of retiring outstanding campaign debts of both committees. Both Mr. Rowland and Senator Sasser appeared at the event, greeted guests, and made brief statements. The agreement (enclosed with your letter of April 6, 1977) between the two committees concerning the event provides that net proceeds would be divided 90 percent to the Rowland for Congress Committee and 20 percent to the Sasser for Senate Committee. The agreement also relates that:

1. The event shall be billed as a "Fund Raising Reception to Help Retire the Campaign Deficits of: Senator Jim Sasser and Mike Rowland" and will be held at the Andrew Johnson Hotel, Gay Street, Knoxville, Tennessee, from 6:00 to 8:00 p.m. on Saturday, January 15, 1977.
2. Admission to the event shall be One Hundred Dollars (\$100) per individual or couple.



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3. Contributors shall be asked to make their checks payable to "Sasser for Senate/Rowland for Congress" and the checks together with any cash contributions, shall be deposited in an account by that name, Anna F. Hinds, signatory.
4. A list of contributors indicating eighty percent (80%) to Rowland and twenty percent (20%) to Sasser shall be maintained by A. F. Hinds and furnished to Gary Blackburn, Treasurer of the Sasser for Senate Committee together with twenty percent (20%) of the net proceeds.
5. Expenses of the fund raising event will be paid prior to distribution of the proceeds. Each committee shall report its pro rata share of the proceeds together with an itemization of individual contributions in excess of One Hundred Dollars (\$100) and will maintain in its files a list of contributors.

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Your April 6 letter indicates that a number of individuals sold tickets priced at \$100 each; most of the persons who purchased tickets bought one or two. Records were kept of the names of each individual ticket purchaser; each purchaser, you say, understood that the fundraiser was on behalf of Mr. Rowland and Senator Sasser although specific information as to the division of the proceeds between their respective committees was not given.

The Rowland committee has now forwarded a check to the Sasser committee in the amount of \$1,635.39 representing the Sasser committee's pro rata share of the net proceeds. You request an advisory opinion as to whether the Sasser committee may accept the agreed share of the fundraising proceeds, and if so, whether the Sasser committee should report its receipt of these proceeds as "a receipt or transfer from the congressional candidate's committee, or should receipts be itemized by name of ticket purchasers and allocated between the two committees for reporting purposes?"

The Commission concludes that the Sasser for Senate Committee may accept its agreed pro rata share of the net proceeds from the event which share should be reported as

a transfer from the Rowland Committee. This conclusion is based on the agreement entered into between the two committees before the event was held and the stated fact that both Mr. Rowland and Senator Sasser appeared and participated in the fundraising event. 1/ The conclusion is also subject to the requirements discussed hereafter.

Compliance with the contribution limits

Pro rata contributions to the Sasser Committee may be accepted and retained by the Sasser Committee only to the extent that contributors to whom those pro rata contributions are attributed have not previously "used-up" their respective contribution limits with respect to 1976 election(s) involving Senator Sasser. See 2 U.S.C. §441a(a). In other words, the Sasser Committee's pro rata share of each contribution (ticket purchase) must be aggregated with all other contributions of the contributor/purchaser to the Sasser campaign for a 1976 election(s) regardless of whether the other contributions were made in 1975, 1976, or 1977. The 20 percent pro rata share of each contribution must be based on the gross amount of the "purchase price" for a ticket to the event. 2/

Reporting contributions and expenditures related to fundraiser

The Sasser Committee should report its receipt of the net proceeds (\$1,635.39) as a transfer from the Rowland Committee assuming the Rowland Committee reports all contributions received and itemizes contributors where the amount of a combined contribution allocable to both committees exceeds the \$100 reporting threshold for

1/ The agreement is viewed as satisfying the authorization requirements in §§101.2 and 102.12 of the regulations. The Commission notes its concern that contributors were not given notice as to the specific division which would be made of their contributions, but in this particular case will not disapprove the transfer if proper disclosure is made and the contribution limits are not exceeded. Compare Advisory Opinion 1977-14 (copy enclosed).

2/ §100.4(a)(2) of the Commission's regulations.

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calendar year 1977. 3/ The Sasser Committee needs to submit a memorandum Schedule A in support of its reported transfer from the Rowland Committee. The Schedule should be identified as related to the subject event and disclose detailed contributor information for each instance where the 20 percent pro rata share attributed to the Sasser Committee exceeds \$100 from a particular individual when aggregated with other contributions made by that same individual in calendar year 1977. The memo Schedule A must identify each political committee contributor to which a pro rata share is attributed, regardless of amount. See 2 U.S.C. §434(b)(4). The pro rata shares in either case should be based on the gross amount of the contribution/purchase since the limits apply to gross amounts rather than net. The Sasser Committee needs to designate (by amendment to its Statement of Organization) the bank where the account for this event was established as an additional depository. 4/

Expenditures in connection with the event would not need to be reported by the Sasser Committee since, as you indicate, the proceeds transferred to the Sasser Committee represent 20 percent of the funds remaining after expenses for the event have been paid. The expenses would, however, need to be reported by the Rowland Committee.

Allocation of costs of event

As stated above, expenditures to defray expenses of the event were evidently shared in the same proportion as the agreed division of the net proceeds. Any advance payments made by the Rowland Committee to defray expenses of the event would be loans or advances and thus contributions to the Sasser Committee (and counted against the Act's contribution limits), unless (1) the Sasser Committee itself funded 20 percent of any advance payments needed or (2) the 20 percent Sasser share was \$500 or less and distribution of net proceeds to the Sasser Committee was made within 60 days of the date of the advance. 5/

3/ See 2 U.S.C. §434(b)(2), (4), (6) and §104.2(b)(2), (4), and (6) of the Commission's regulations.

4/ §103.3 of the regulations.

5/ See §104.2(b)(11) and §104.8(b) of the regulations.

This response constitutes an advisory opinion concerning the application of a general rule of law stated in the Act, or prescribed as a Commission regulation, to the specific factual situation set forth in your request. See 2 U.S.C. §437f.

Sincerely yours,

Thomas E. Harris

Thomas E. Harris
Chairman for the
Federal Election Commission

Enclosure

78040074424





FEDERAL ELECTION COMMISSION

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

April 20, 1977

AO 1977-14

Dennis J. Whittlesey, Esquire
Casey, Lane & Mittendorf
815 Connecticut Avenue, N.W.
Washington, D. C. 20006

Dear Mr. Whittlesey:

This refers to your letter of March 25, 1977, with enclosure, requesting an advisory opinion concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act"), to a special joint effort committee which would be established to assist several presidential campaign committees in retiring their outstanding campaign debts. You also request an opinion whether the special committee may participate in a fundraising dinner planned by the Democratic Senatorial and Congressional Campaign Committees and scheduled for May 25, 1977.

With respect to the first part of the request, your letter and enclosure explain that the presidential campaign committees of Birch Bayh, Fred R. Harris, and Sargent Shriver propose to undertake joint fundraising to retire their respective presidential campaign debts. The joint effort would be pursued through a "Special Committee" which would, in fact, be an authorized committee of each of the identified former presidential candidates. The Special Committee would, you say, designate its own depository for receiving all contributions and making distributions to the participating campaigns. In addition: "All distributions will be made on an allocation formula, to be agreed upon by participants, which will use outstanding debt figures as a base for determining the appropriate pro rata division."

The Commission concludes that the presidential campaigns mentioned above may authorize the Special Committee to function on their behalf for the purpose of raising funds to retire their respective presidential campaign debts. The Special Committee would be required to be authorized in writing by each of the participating former presidential candidates; each participating campaign will need to



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designate the Special Committee's depository as one of its depositories. The Special Committee would be subject to all the requirements of the Act and regulations including (but not limited to) the recordkeeping, registration, reporting, and contribution limit provisions. 1/

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All persons making contributions to the Special Committee will be regarded as making a contribution to the participating presidential campaigns; this means that an appropriate accounting system must be utilized to assure compliance with the contribution limits. See 2 U.S.C. §441a(a)(1)(A) and (a)(2)(A). This system must provide for the situation where persons may have already contributed their allowable limit (or less) to one of the participating presidential campaigns and must permit such persons to expressly allocate their contribution between or among those participants as to whom they have not "used up" their §441a(a)(1)(A) or (a)(2)(A) limits. The Commission notes in this regard that prior contributions to the participating campaigns must be taken into account whether made in 1975, 1976, or 1977. 2/ Contributions from individuals are also subject to the carryover, carryback language in 2 U.S.C. §441a(a)(3). 3/ All solicitations for contributions and other materials (including tickets) which are used by or on behalf of the Special Committee shall include sufficient notice to potential contributors of the applicability of the candidate contribution limits to contributions made to the Special Committee; a method and instructions for allowing contributors to allocate their contributions among the participating presidential campaigns shall also be provided.

The general allocation formula, as agreed upon by the participants, may be used to the extent that contributors are not required to make special allocations of their contributions under the circumstances described above. Upon receiving distributions from the Special Committee each participating campaign will also be responsible for assuring that a contribution is not retained if it exceeds the applicable limits of the contributor to whom it is attributable. To facilitate this review, the Special Committee

1/ See 2 U.S.C. §§432, 433, 434, 441a; see also Parts 102, 103, 104, and 110 of the Commission's regulations (copy enclosed).

2/ 2 U.S.C. §441a; see §110.1(a)(2) and §110.1(g)(2) of the regulations.

3/ See also §110.5 of the regulations.

shall transmit with each distribution payment to a participating campaign, a listing of the contributors who are identified with the aggregate amount being remitted. 4/ The participating campaign shall itemize on its reports the contributor information so forwarded to the extent such itemization would be required if the participant received the contribution directly, rather than through the Special Committee. 5/ Each participating campaign should maintain contributor records in the same order that would be required in connection with the submission of claims for matching funds. See §131.2(c)(1) of the regulations.

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The distributions of fundraising proceeds by the Special Committee to the participating presidential campaigns are not subject to limit in and of themselves. 6/ However, to avoid the occurrence of a contribution in-kind from one or more of the participating presidential campaigns to another, such participant shall bear a pro-rata share of all fundraising or other expenses of the Special Committee. This share shall be determined on the same basis used for allocating the distribution of funds raised through the joint effort. For example, if the allocation formula allows the Shriver campaign 70 percent of the contributions received by the Special Committee, then that campaign must bear 70 percent of the expenses incurred by or on behalf of the Special Committee to raise those contributions. 7/ Any advance payments required in connection with a fundraising event of the Special Committee must also be made by the participating campaigns on the same basis described above; the advance payments may also be made from contributions received by the Special Committee before the May 25 event if those contributions are charged against the relevant limitations of their donors vis-a-vis the participating campaigns.

4/ See 2 U.S.C. §432(c) and §102.9(a) of the regulations.

5/ 2 U.S.C. §434(b)(2); see also §104.2(b)(2) of the regulations.

6/ See 2 U.S.C. §441a(a)(5)(A); see also §110.3(a)(2)(i) and (a)(2)(ii).

7/ Contributions in the form of ticket purchases to a fundraising dinner or other fundraising event are reportable and subject to limit in their gross amount. See 2 U.S.C. §434(b)(2) and §100.4(a)(2) of the regulations. Of course, 1976 presidential campaigns subject to limitation under 2 U.S.C. §441a(b)(1)(A) may, for expenditure limitation purposes only, exclude costs to solicit contributions up to the total amount of \$2,132,000. 2 U.S.C. §431(f)(4)(I).

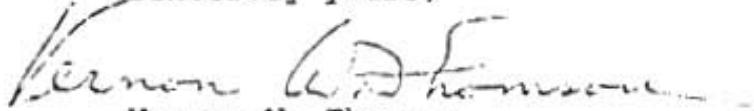
The second part of your opinion request relates to participation by the Special Committee in a \$500 per ticket fundraising dinner of the Democratic Senatorial and Congressional Campaign Committees. It is proposed that the Special Committee be made a beneficiary of the dinner event; it would:

be issued a block of tickets for this function, which tickets will be sold by and/or for it. All proceeds from the sale of these tickets will be retained by the Special Committee for distribution to its participating campaigns.

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Subject to the discussion above regarding part one of your request, the Commission concludes that participation by the Special Committee is permissible. Contributors who purchase tickets from the Special Committee, or from others selling tickets on behalf of the Special Committee, must be informed of the distribution formula to be utilized and given an option to allocate or designate their ticket purchase/contribution among the participating campaigns of the Special Committee (see preceding discussion on this issue). Furthermore, the Campaign Committees may not bear a disproportionate share of the expenses for the dinner event unless they regard such disproportion as a contribution (subject to limit) to each of the participating presidential campaigns. Similarly, any advance payments for expenses of the event must be shared by the Special Committee and the two Campaign Committees according to the ratio of tickets issued to each Committee. If the expenses and advances are handled in accordance with the foregoing, the Committees will not be regarded as having made contributions to each other. 8/

This response constitutes an advisory opinion concerning the application of a general rule of law stated in the Act, or prescribed as a Commission regulation, to the specific factual situation set forth in your request. See 2 U.S.C. §437f.

Sincerely yours,



Vernon W. Thomson
Chairman for the
Federal Election Commission

Enclosure

8/ See 2 U.S.C. §441a(a) (5) (A) and §110.3(a) (2) (i) of the regulations.

Exhibit D

Advance Payments Made For Joint Fundraiser

<u>Payee</u>	<u>Purpose*</u>	<u>Date</u>	<u>Amount</u>
<u>CFR Activity</u>			
U.S. Postmaster-VA	Postage expense	4/25/77	\$ 585.00
Elaine Glick	Miscellaneous	4/8/77	328.60
Hyatt Regency	Deposit	4/7/77	500.00
U.S. Postmaster-VA	Postage	5/24/77	653.88
U.S. Postmaster-CA	Postage	6/3/77	313.82
Bay Area Travel Service	Airfare	6/3/77	784.00
Hyatt Regency	Banquet Expense	6/9/77	<u>11,171.60</u>
Total identified advance payments by CFR per reports (4/7/77-6/9/77 only)			<u>\$14,336.90**</u>

NCPAC Activity

Unidentified per NCPAC's reports

Reimbursed dinner expenses-including telephone, mailgram, xerox, printing	7/13/77 reimbursement date-date of actual expense unidentifiable per NCPAC's reports	\$ <u>1,301.92***</u>
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* Identified on CFR's reports as expense relating to joint fundraising event.

** This total does not include \$833.55 in reported payments by CFR post 6/9/77 nor does this total include \$2,322.58 representing the unidentified dollar value of expenses reported as being paid by CFR and reimbursed on 6/30/77 from the separate account. [17,493.03 less (14,336.90 + 833.55) = \$2,322.58] The possibility also exists that some of CFR's personnel spent time organizing the event, which should also be considered as relating to the joint fundraiser in the same manner as the expenses noted above.

*** This amount represents a reimbursement to NCPAC from the proceeds of the joint fundraiser for expenses incurred and paid for by NCPAC.

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FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF OUR # 732

DATE FILMED _____

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