

80040203057

THIS IS THE END OF ROL 2 1243

Date Filmed 9/9/80 Camera No. 2

Camera 5pc

Large reports

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):

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| <input type="checkbox"/> (1) Classified Information | <input checked="" 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

Mama E. Hito

date

August 11, 1978

FEC 9-21-77

PS Form 3811, Aug. 1978

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

1. The following service is requested (check one):
 Show to whom and date delivered.
 Show to whom, date, and address of delivery.
 RESTRICTED DELIVERY
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 Show to whom, date, and address of delivery.
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: *James Chung*
5338 South Melford Rd.
Melford, Ohio 45150

3. ARTICLE DESCRIPTION:
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.
 | *94758* | |

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent
J. Grace Christy

4. DATE OF DELIVERY: *8-11-80* POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

MW MUR243

☆ GPO: 1978-0-270-000

PS Form 3811, Aug. 1978

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 RESTRICTED DELIVERY
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 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: *John Thomas*
Stein House
2208 Central Tower
Cincinnati, Ohio 45202

3. ARTICLE DESCRIPTION:
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.
 | *94758* | |

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent
John Thomas

4. DATE OF DELIVERY: *8-11-80* POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

MW MUR243

☆ GPO: 1978-0-270-000

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

No: 1000 1243

Dear Mr. [Name]

On June 4, 1980, the Commission notified you of a complaint alleging that your client, the [Name] for Congress Committee, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act").

The Commission, on July 29, 1980, determined that, on the basis of the information in the complaint and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission has closed its file in this matter. This matter will be made a part of the public record within 30 days.

Please note that Advisory Opinion 1975-87 was issued prior to the enactment of the 1976 amendments to the Act, and, that the Act was further amended in late 1979. Currently, the Act provides that any candidate for federal office who receives a contribution or any loan for use in connection with the campaign, or who makes a disbursement in connection with the campaign, shall be considered as having received the contribution or loan, or as having made the disbursement, as the case may be, as an agent of the authorized committee or committees of such candidate. 2 U.S.C. § 432(e). 2 U.S.C. § 434 requires that each report filed by a political committee report the total amount of all receipts and disbursements for the reporting period and the calendar year. Additionally, while 11 C.F.R. § 106.3(d) states that the costs incurred by a candidate for U.S. Senate or House of Representatives for travel between Washington, D.C. and the state or district in which he is a candidate need not be reported unless the costs are paid by a candidate's authorized committee(s), or by any other political committee(s), section 106.3(b)(1) of the

30040203062

Chief, Bureau of Civil and Criminal
2200 Central Express Tower
Cincinnati, Ohio 45202

Re: NUR 1241

Dear Mr. Strauss:

On June 4, 1980, the Commission notified you of a complaint alleging that your client, the McGee for Congress Committee, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act").

The Commission, on July 29, 1980, determined that, on the basis of the information in the complaint and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission has closed its file in this matter. This matter will be made a part of the public record within 30 days.

Please note that Advisory Opinion 1975-87 was issued prior to the enactment of the 1976 amendments to the Act, and, that the Act was further amended in late 1979. Currently, the Act provides that any candidate for federal office who receives a contribution or any loan for use in connection with the campaign, or who makes a disbursement in connection with the campaign, shall be considered as having received the contribution or loan, or as having made the disbursement, as the case may be, as an agent of the authorized committee or committees of such candidate. 2 U.S.C. § 432(e). 2 U.S.C. § 434 requires that each report filed by a political committee report the total amount of all receipts and disbursements for the reporting period and the calendar year. Additionally, while 11 C.F.R. § 106.3(d) states that the costs incurred by a candidate for U.S. Senate or House of Representatives for travel between Washington, D.C. and the state or district in which he is a candidate need not be reported unless the costs are paid by a candidate's authorized committee(s), or by any other political committee(s), section 106.3(b)(1) of the

If you have any questions please contact me at 202-452-1100.
We will be happy to discuss this matter with you.

Sincerely,

MW 8/7/80

Charles N. Steele
General Counsel

60040203063

James Christy
5338 South Wilford Road
Milford, Ohio 45130

May 22, 1968

Dear Mr. Christy:

The Federal Election Commission has reviewed the allegations of your complaint dated May 22, 1968, and determined that, on the basis of the information contained in the complaint and information provided by the respondent, there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended (the "Act") has been committed. Accordingly, the Commission has decided to close the file in this matter.

Should additional information come to your attention which you believe establishes a violation of the Act, please contact Maura White, the staff member assigned to this matter at 202-523-4060.

Sincerely,



Charles N. Steele
General Counsel

30040203004

MEMORANDUM TO: CHARLES HENRIK *CH*
FROM: MARGARET E. HENRIK/ASSISTANT CHIEF OF STAFF
DATE: AUGUST 6, 1980
SUBJECT: MUR 1243 - Memorandum to the Commission
dated 8-4-80; Received in OCS 8-4-80,
4:35

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 11:00, August 5, 1980.

There were no objections to the revised proposed letter to the respondent, the McEwen for Congress Committee, as attached to the above-named memorandum.

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MEMORANDUM FOR THE COMMISSION

July 29, 1980

TO: The Commission

FROM: Charles [Signature]
General

SUBJECT: MR 1243

On July 29, 1980, the Commission approved the General Council's recommendation on MR 1243 but directed the Office of General Counsel to revise the proposed letter to the respondent, the House for Congress Committee. Attached for the Commission's approval is a copy of the revised letter that the General Council recommends be sent to the respondent.

606402030

CONFIDENTIAL
EXEMPT FROM DISCLOSURE

Ernest Strauss, Esq.
Esler, Strauss, White and Tobias
2200 Central Trust Tower
Cincinnati, Ohio 45202

Re: MUR 1243

Dear Mr. Strauss:

On June 4, 1980, the Commission notified you of a complaint alleging that your client, the McGowan for Congress Committee, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act").

The Commission, on July 29, 1980, determined that, on the basis of the information in the complaint and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission has closed its file in this matter. This matter will be made a part of the public record within 30 days.

Please note that Advisory Opinion 1975-87 was issued prior to the enactment of the 1976 amendments to the Act, and, that the Act was further amended in late 1979. Currently, the Act provides that any candidate for federal office who receives a contribution or any loan for use in connection with the campaign, or who makes a disbursement in connection with the campaign, shall be considered as having received the contribution or loan, or as having made the disbursement, as the case may be, as an agent of the authorized committee or committees of such candidate. 2 U.S.C. § 432(e). 2 U.S.C. § 434 requires that each report filed by a political committee report the total amount of all receipts and disbursements for the reporting period and the calendar year. Additionally, while 11 C.F.R. § 106.3(d) states that the costs incurred by a candidate for U.S. Senate or House of Representatives for travel between Washington, D.C. and the state or district in which he is a candidate need not be reported unless the costs are paid by a candidate's authorized committee(s), or by any other political committee(s), section 106.3(b)(1) of the

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Very truly yours,
The staff members of this office.

Sincerely,

Charles E. Steele
General Counsel

60040203009

In the Matter of)
)
McBee for Congress Committee)

MUR 1243

ISSUED CERTIFICATION

I, Marjorie W. Emons, recording secretary for the Federal Election Commission's executive session on July 29, 1980, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1243:

1. Find no reason to believe that the McBee for Congress Committee violated 2 U.S.C. 9434.
2. Approve the letter to Complainant, as submitted with the General Counsel's July 18, 1980 report in this matter.
3. Direct the Office of General Counsel to revise the letter to Respondent, and circulate it for Commission approval on a no-objection basis.
4. Close the file.

Attest:

8/4/80
Date

Marjorie W. Emons
Marjorie W. Emons
Secretary to the Commission

60040303070

In the Matter of)
McBee for Congress Committee)

MR 1243

CERTIFICATE

1. Marjorie W. Evans, recording secretary for the Federal Election Commission's executive session on July 29, 1980, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MR 1243:

1. Find no reason to believe that the McBee for Congress Committee violated 2 U.S.C. 5434.
2. Direct the Office of General Counsel to circulate revised letters for Commission approval on a no-objection basis.
3. Close the file.

Attest:

60040203071
7/30/80

Marjorie W. Evans

Date and Time of Meeting: FRIDAY, JULY 18, 1980

Commissioner FRIEDERSON, ARMS, THOMAS, McGARRY, NEVIN, PERKINS

RETURN TO OFFICE OF COMMISSION SECRETARY BY: TUESDAY, JULY 22, 1980
1:00

MUR No. 1243 - First General Counsel's Report dated 7-18-80

- I approve the recommendation
- I object to the recommendation

COMMENTS: I would like a discussion of
footnote 3, page 5 even though I agree with
the recommendations.

Date: July 23, 1980 Signature: Charles D. Thomas

THE OFFICE OF GENERAL COUNSEL WILL TAKE NO ACTION IN THIS MATTER UNTIL THE APPROVAL OF FOUR COMMISSIONERS IS RECEIVED. PLEASE RETURN ALL PAPERS NO LATER THAN THE DATE AND TIME SHOWN ABOVE TO THE OFFICE OF COMMISSION SECRETARY. THE OBJECTION PLACES THE ITEM ON THE EXECUTIVE SESSION AGENDA.



00040203073

COMPLAINANT'S NAME: James Christy

RESPONDENT'S NAME: Ballman for Congress Committee

RELEVANT STATUTE: 2 U.S.C. § 434

INTERNAL REPORTS CHECKED: Committee reports

FEDERAL AGENCIES CHECKED: None

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OFFICE OF THE
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600400

SUMMARY OF ALLEGATIONS

On May 30, 1980, James Christy filed a complaint with the Federal Election Commission against the McEwen for Congress Committee (the "Committee"). The complaint alleges that the committee failed to report certain campaign expenditures in violation of 2 U.S.C. § 434 (Attachment 1). On June 4, 1980, the Commission notified the committee that a complaint had been filed. The committee's responses to the allegations were received by the Commission on June 23, 1980, and July 2, 1980 (Attachments 2 and 3).

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 434(b)(5)(A) requires that a political committee report the name and address of each person to whom an expenditure in an aggregate amount or value in excess of \$200 within the calendar year is made to meet a candidate or committee operating expense, together with the date, amount, and purpose of such operating expense. 2 U.S.C. § 434(b)(4) requires each report filed to disclose the total amount of all disbursements during a reporting period and during a calendar year.

The complaint first alleges that the committee failed to report expenditures incurred by candidate McEwen and his wife during their attendance at a seminar sponsored by the National Republican Congressional Committee between February 17, 1980, and February 21, 1980. The complaint asserts that the cost of lodging (approximately \$260) during the seminar and the cost of the seminar itself constitute campaign expenditures and are subject to the reporting requirements of the Act as they do "not constitute routine living expenses of the candidate which would have been incurred without candidacy."

A review of the April 15, 1980, quarterly report filed by the committee revealed that the complaint is correct in stating that the committee did not report any expenditures in connection with the seminar sponsored by the NRCC. The committee's counsel, however, has described the NRCC Candidate Conference as "a regularly-scheduled event, sponsored by the NRCC as a method of strengthening incumbent and non-incumbent Congressional candidates' showings in the general elections. Its history and purposes are succinctly described in the preamble of AO 1975-87." The committee's responses of June 23 and July 2 explained that Mr. McEwen "paid all expenses for travel and lodging from his own, personal account" and that "neither the Committee nor the candidate reported these disbursements by virtue of the fact that the Commission's Regulations at 11 C.F.R. § 106.3(d), and the Commission's holding in Advisory Opinion 1975-87 (AO 1975-87), ..., specifically exempt such disbursements from reporting requirements."

Advisory Opinion 1975-87, issued on January 13, 1976, states in pertinent part:

Since expenses generally incurred by all candidates for travel between Washington, D.C. and their place of candidacy are not reportable expenditures unless paid from campaign funds, the Commission concludes that the candidate's expenses for personal travel to attend the NRCC forum in Washington are not chargeable against the applicable limits of 18 U.S.C. 608. While expenses for the candidate's travel would be exempt, other costs such as meals or hotel accommodations which are in relation to the forum must be characterized as expenditures within the meaning of 2 U.S.C. 431(f) 18 U.S.C. 591(f) unless they are paid for from the candidate's personal funds (emphasis added).

With regard to the registration fee, the Commission is of the view that with respect to candidates (and their official representations) insofar as it represents the costs of organizing

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Respondent argues that "Mr. McEwen was attending a conference in all respects substantially the same as that for which Advisory Opinion 1975-87 was issued and that Mr. McEwen "is justified in not reporting these costs, inasmuch as he relied on Advisory Opinion 1975-87, and this reliance is sanctioned by 2 U.S.C. § 434(a)."

The complaint has indicated that both candidate McEwen and his wife attended the NRCC forum and the committee's response of July 2, 1980, has agreed that Mrs. McEwen attended the conference. Respondent's counsel did state, however, in a telephone conversation with a staff member of the Office of General Counsel that while Mrs. McEwen did attend the conference, she does not work in the campaign in any capacity. In view of this fact, it appears that the committee need not report any expenditures incurred in connection with Mrs. McEwen's attendance at the forum, as long as such expenditures are paid by either her or her husband's personal funds.

While Commission regulations at 11 C.F.R. § 106.3(b)(1) state that travel expenses paid for by a candidate from personal funds shall constitute reportable expenditures if the travel is campaign-related, the regulations further state that the costs incurred by a candidate for U.S. Senate or House of Representatives for travel between Washington, D.C. and the state or district in which he or she is a candidate need not be reported unless the costs are paid by a candidate's authorized committee or by any other political committee. 11 C.F.R. § 106.3(d). Additionally, Advisory Opinion 1975-87 cited the proposed regulations on the allocation of candidate and committee activities as the basis for its conclusion in regard to the reporting of travel expenses to Washington, D.C. Thus, as the travel expenses of Robert McEwen to the NRCC Conference in Washington, D.C. were paid for from personal funds, the General Counsel recommends that the Commission find no reason to believe that the committee violated 2 U.S.C. § 434 in regard to the reporting of travel expenses.

1/ At the time that AO 1975-87 was issued, the NRCC incurred the costs of the registration fee for incumbents.

In regard to the reporting of meals and the costs of meals, the Committee has determined that the Committee did not violate that the committee violated 2 U.S.C. § 4378(a), which is sanctioned by 2 U.S.C. § 4378(a), which exempts the reporting of the registration, expenditure, and which exempts the reporting of costs of meals and lodging if they are paid for a candidate's personal funds.

B. Failure to report expenditures in connection with the leasing of a mobile van

Secondly, the complaint alleges that the committee failed to report expenditures incurred in connection with the leasing of a mobile van used by candidate Robert DeLoach for "conveying literature, transporting campaign personnel and displaying signs." A review of the April 15, 1980, quarterly report indicated that the complaint is correct in stating that the committee did not report any expenditures in connection with the leasing of the van, but, the response of the committee to the allegations, as well as an affidavit of the lessor, indicates that the allegations are without merit.

The committee's June 23, 1980, and July 2, 1980, responses have stated that a mobile van was leased from the E.J. Boebinger Agency, Inc. "for occasional campaign uses" and was used on 16 days between February 1 and June 6, 1980. 2/ The committee further explained that the campaign leased the vehicle at fair rental value and "had expected invoices to be forthcoming prior to the time that any report was due." The committee's campaign manager apparently "made an express request for such an invoice prior to the closing of the books for the first quarterly report" but the "reason that the invoice was not forthcoming was that the company was having severe problems with its accountant." The committee's July 2 response included the affidavit of Charles Greener, campaign manager of the McEwen for Congress Committee, which stated that on or about March 1, 1980, he made a second verbal request for an invoice from the E.J. Boebinger Agency, Inc. The committee's response also noted that because the "E.J. Boebinger Agency Inc. is a corporation, the Committee has been particularly sensitive to the potential for violating the Federal Election Campaign Act, as amended" and "therefore, made a special effort to insure that these

2/ The committee's response of June 23, 1980, stated that the mobile van was used on 15 days between February 1, 1980, and June 15, 1980.

bills were paid." The committee's response that the committee "fully intended to be billed for the use of the vehicle" but that as of 1980, the company had "yet to render such an invoice." 3/

The affidavit of the Director of Financial Services of the Boebinger Agency, Inc., stated the agency "at all times intended to bill for use of such motor home" but that due to problems with the IRS and the agency's accountant "there has been a delay in the billing for the use of the motor home." The committee's July 2, 1980, response stated that an invoice was finally presented to the committee on June 25, 1980, and that it "reflects the Agency's investigation into the cost of renting a comparable vehicle for comparable periods of time and for comparable mileage." The committee's July 2 response also stated that the invoice had been "paid by the Committee as of this date."

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3/The committee's counsel noted in his response that during his review of the procedure by which gasoline bills were rendered to the committee and paid by the committee, that "it has become apparent that the reporting procedures utilized are probably less than adequate." It was explained that the candidate or his wife purchase gasoline on a personal credit card, for campaign related activity, and then give the receipt to the committee. Upon receipt of the invoice from the oil company by the candidate, the committee draws "checks payable to the candidate," (and reports such as reimbursement for travel expenses on Schedule B) "or directly to the oil company." Respondent's counsel concluded that this procedure "appears to me to be an advance by the candidate, which should be reported on Schedule C as debts owed to the candidate to the extent that the candidate has advanced credit to the Campaign Committee." Moreover, the committee "has made, in several cases, only partial payment to the candidate or to the oil company for gasoline charges attributable to campaign-related activities." Upon recognition of this reporting problem, respondent's counsel has stated that they propose to report this properly in the future and have submitted amendments to the April 15, 1980, and 12 day pre-primary election reports which reflect extensions of credit to the committee by the candidate.

As the committee was unable to obtain an invoice for the use of the van but fully intended to pay for use, and the lessor fully intended to be compensated, General Counsel recommends that the Commission find no reason to believe that the committee violated 2 U.S.C. § 434 in regard to the reporting of the rental of the van.

C. Itemized Expenditures

Thirdly, the complaint alleges that the committee's April 15, 1980, quarterly report is incorrect as itemized disbursements total \$10,800.54, the sum of all disbursements reported, and this, therefore, "implies that no expenditures for campaign related purposes of less than \$100 were made, a highly unlikely possibility." A review of the April 15, 1980, quarterly report of the committee indicates that the complainant is correct in stating that the committee reported \$10,800.54 in disbursements. Further review of the report, however, revealed that this allegation is unfounded as all disbursements made by the committee, regardless of amount, were itemized on the April 15, 1980, quarterly report. Respondent's counsel has stated that all "future reports will contain itemized expenditures reported in accordance with §104 of the Regulations, and will not itemize more disbursements than those which are required."

Accordingly, the General Counsel recommends that the Commission find no reason to believe that the Committee violated 2 U.S.C. § 434 in regard to the reporting of itemized expenditures.

RECOMMENDATIONS

1. Find no reason to believe that the McEwen for Congress Committee violated 2 U.S.C. §434.
2. Send the attached letters.
3. Close the file.

Attachments:

1. Attachments 1-3
2. Letters (2)

80040203080

80040203001

General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20543

Dear Sir:

Enclosed is an Affidavit filed pursuant to the compliance provisions of the Federal Election Campaign Act and the Federal Election Commission Regulations. For your reference, the affidavit concerns a report filed by the McEwen for Congress Committee. Robert McEwen is a candidate for Congress in the Sixth Ohio Congressional District.

We would appreciate your prompt attention to this matter.

Sincerely,



Jerry R. McBride

JRM/cg

encl.

80040703002

1

STATE OF OHIO

COUNTY OF CLEMONT, SS:

James Christy, being duly sworn, does state as follows:

1. Affiant has personal knowledge that Candidate Robert McEwen and his wife, Elizabeth McEwen, lodged in the Stouffer's National Centre Hotel between February 17, 1980, and February 21, 1980, while attending a seminar conducted in Washington by the National Republican Congressional Committee.
2. The reasonable value of lodging in the Stouffer's National Centre Hotel for the period of February 17, 1980, to February 21, 1980, is approximately \$260.00.
3. The cost of the aforementioned seminar to each participant, to which Affiant also attended, was \$75.00.
4. The cost of lodging in the Stouffer's National Centre Hotel does not constitute routine living expenses of the Candidate which would have been incurred without candidacy, and as such together with the cost of the aforementioned seminar constitute campaign expenditures under the Federal Election Campaign Act, as amended, and under applicable Federal Election Commission regulations, and are subject to reporting requirements pursuant to said regulations.
5. Elizabeth McEwen, wife of Candidate Robert McEwen, disclosed to Affiant on at least one occasion that a mobile home used by Candidate Robert McEwen for conveying literature, transporting campaign personnel, and displaying signs was leased and not owned by said Candidate.
6. To the best of Affiant's knowledge, Candidate Robert McEwen's

STATE OF OHIO

COUNTY OF CLEWORTH, OH

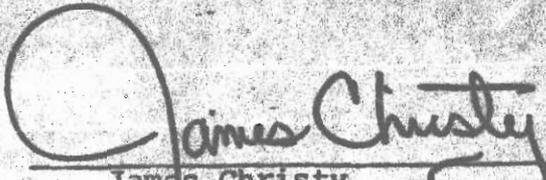
James Christy, being duly sworn, does state as follows:

1. Affiant has personal knowledge that Candidate Robert McEwen and his wife, Elizabeth McEwen, lodged in the Stouffer's National Centre Hotel between February 17, 1980, and February 21, 1980, while attending a seminar conducted in Washington by the National Republican Congressional Committee.
2. The reasonable value of lodging in the Stouffer's National Centre Hotel for the period of February 17, 1980, to February 21, 1980, is approximately \$260.00.
3. The cost of the aforementioned seminar to each participant, to which Affiant also attended, was \$75.00.
4. The cost of lodging in the Stouffer's National Centre Hotel does not constitute routine living expenses of the Candidate which would have been incurred without candidacy, and as such together with the cost of the aforementioned seminar constitute campaign expenditures under the Federal Election Campaign Act, as amended, and under applicable Federal Election Commission regulations, and are subject to reporting requirements pursuant to said regulations.
5. Elizabeth McEwen, wife of Candidate Robert McEwen, disclosed to Affiant on at least one occasion that a mobile home used by Candidate Robert McEwen for conveying literature, transporting campaign personnel, and displaying signs was leased and not owned by said Candidate.
6. To the best of Affiant's knowledge, Candidate Robert McEwen's

7. The fair rental value of the mobile home is in excess of \$100.00 monthly, and said disbursements for same are subject to the reporting requirements of the Federal Election Commission, unless in fact said mobile home constitutes Candidate Robert McQueen's residence.

8. The Report of Receipts and Disbursements filed for record by the McQueen for Congress Committee on April 15, 1980, purports to show the total expenditures through March 31, 1980, of \$10,800.54, with the total of all itemized disbursements in said report also totalling \$10,800.54. Said report consequently implies that no expenditures for campaign related purposes of less than \$100.00 was made, a highly unlikely possibility.

9. The cost of the above mentioned lodging and seminar, and the fair rental value of the aforementioned mobile home, are campaign expenditures under the Federal Election Commission Regulations, and since the Report of Receipts and Disbursements of April 15, 1980, does not list these expenditures as campaign expenditures, while purporting to include all such campaign expenditures in such report, said report is erroneous in failing to list such expenditures as campaign expenditures.



James Christy
5338 South Milford Rd.
Milford, Ohio 45150
(513) 831-7939

Sworn to and subscribed in my presence this 23rd day of May, 1980.


Karen Knause, Notary Public In
and for the State of Ohio
My commission expires 4/27/85.

600409030006

DAVID A. SCHWARTZ
FRANK J. HALL
DAVID A. SCHWARTZ
FRANK J. HALL

208713

General Counsel
FEDERAL ELECTION COMMISSION
Washington, D. C. 20463

ATTENTION: Maura White, Esq.

RE: MUR 1243; McEwen For Congress

Dear Ms. White:

This letter is to reconfirm our telephone conversation yesterday, Tuesday, June 17, 1980. The McEwen for Congress Committee did not receive your letter of June 4, 1980, until June 11, 1980, by virtue of the post office's failure to notify them that the certified mail had been received. The envelope, with the green card attached, sat in the post office box for several days as a consequence of that. The letter was, however, received on June 11, and the 15 day period should, presumably, begin to run from that point.

As I indicated over the telephone, my initial review of the facts and circumstances surrounding the allegations contained in Mr. Christy's complaint indicates that there are probably some reporting errors, but there do not appear to be any substantial violations of the Federal Election Campaign Act, as amended. We would therefore hope to proceed in a stance of conciliation, to the extent that it would appear some reports require amending as well as some explanations needing to be provided.

I had hoped to be able to send you a more thorough report at this time, but since I cannot I will do you the courtesy of indicating the Committee's initial stance with respect to the three main allegations in the complaint:

1. Mr. McEwen's attendance at the National Republican Congressional Committee's Candidate Conference is governed, in our opinion, by the Commission's regulations, at 11 C.F.R. Section 106.3(d), and Advisory Opinion 1975-87. Mr. McEwen paid all expenses for travel and lodging from his own, personal account,

RECEIVED
GENERAL COUNSEL
FEDERAL ELECTION COMMISSION
JUN 20 1980

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Naura White, Esq.
Page Two
June 18, 1980

and under the rules contained in the aforementioned sections should not be required to report them. Section 106.3(d) requires such travel expenses to be reported only if they are paid from a candidate's campaign accounts. This is the case both in the current and in the pending regulations, which are slightly different from one another. Section 106.3(d) deals only with travel expenses. However, Advisory Opinion 1975-87, which was issued to the National Republican Congressional Committee in response to a request dealing specifically with the type of candidate conference which Mr. McEwen attended, exempts specifically lodging and meals if the same are paid from a candidate's personal funds. The Advisory Opinion states in pertinent part:

"While expenses for the candidate's travel would be exempt, other costs such as meals or hotel accommodations which are incurred in relation to the forum must be characterized as expenditures within the meaning of 2 U.S.C. 431(F) and 18 U.S.C. 591(f) unless they are paid for from a candidate's personal funds."

Advisory Opinion 1975-87, Notice 1976-5, 41 Fed. Reg. 2940 (1-20-76); CCH Federal Election Campaign Financing Guide, Paragraph 5178, page 10,122.

We will be sending documentation to the effect that Mr. McEwen paid all these expenses from his personal funds. Therefore, no reporting of these expenses appears to be required.

It appears to us that the candidate is justified in not reporting these costs, inasmuch as he relied on Advisory Opinion 1975-87, and this reliance is sanctioned by 2 U.S.C. Section 437 f (c) and the Commission's Regulations at 11 C.F.R. Section 112.5. Mr. McEwen was attending a conference in all respects substantially the same as that for which Advisory Opinion 1975-87 was issued. Therefore, we respectfully submit that this allegation should be dismissed.

2. The mobile van to which Mr. Christy refers in his complaint has been leased from the E. J. Boebinger Agency, Inc., for occasional campaign uses. We will be submitting affidavits from the company and from the campaign to indicate that the company has owned the vehicle for over three years and that it permitted the campaign to use the vehicle on 15 days between February 1st and June 1st, 1980. The campaign arranged to lease the vehicle at a fair rental value, and had expected invoices to

June 18, 1960

be forthcoming prior to the time that any report was due. Moreover, Charles Greener, the Campaign Manager, made an express request for such an invoice prior to the closing of the books for the first quarterly report. The company will be acknowledging both the original leasing arrangement and the fact that Mr. Greener made a second request for such an invoice, by affidavit of its Vice-President and Director of Finance.

The reason that the invoice was not forthcoming was that the company was having severe problems with its accountant, who is now apparently in jail. While it appears that he did not embezzle from E. J. Boebinger Agency, Inc., his work for that agency was less than satisfactory and he had been fired. The company has been in the process of attempting to reorganize its records and reconstruct the bookkeeping process. It is not a small company, and this is a significant problem for them. As a result, it has turned into a problem for the campaign.

The campaign has consistently paid gasoline and oil bills attributable to the van. Receipts for gasoline used in the van for campaign-related travel have been given to the Committee, and the charges for this gasoline has been reimbursed either to the candidate or to the oil company, depending on which card was utilized at the time. Because the E. J. Boebinger Agency, Inc. is a corporation, the Committee has been particularly sensitive to the potential for violating the Federal Election Campaign Act as amended, particularly 2 U.S.C. Sections 441a, and 441b. It has, therefore, made a special effort to insure that these bills were paid.

The Committee feels obliged to indicate, however, that in the course of my investigation of the procedure by which gasoline bills were rendered to the Committee and paid by the Committee, it has become apparent that the reporting procedures utilized are probably less than adequate. As a general rule, what is done is that the candidate or his wife purchases gasoline on a personal credit card, for campaign-related activity, and gives the receipt to the Campaign Committee. When the oil company sends an invoice to the candidate the Committee has been in the habit of making checks payable directly to the candidate (and designated as reimbursement for travel expenses on Schedule B of Form 3) or directly to the oil company (and properly designated). However, this appears to me to be an advance by the candidate, which should be reported on Schedule C as debts owed to the candidate to the extent that the candidate has advanced credit to the Campaign Committee. The Campaign Committee has made, in several

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cases, only partial payment to the candidate or to the oil company for the gasoline charges attributable to campaign-related activities.

The credit being extended to the Committee is being extended by the candidate, who is utilizing his own good credit with the oil company on behalf of his campaign. We propose not only to report this properly in the future, but also to amend the two reports already sent in, as appropriate.

In brief conclusion as to this allegation, my investigation indicates, and I believe that the evidence will support, the fact that the campaign fully intended to be billed for the use of the vehicle, on the basis of its fair rental value, and that the company was trying but was unable to obtain the information necessary to prepare such a bill, as the consequence of its accountant's incompetence. The Committee was making its best effort to obtain and to report the appropriate information, and is therefore not out of compliance with the Federal Election Campaign Act, pursuant to 2 U.S.C. Section 432(h)(2)(i). The company has yet to render such an invoice, although I have been assured that they are working feverishly to prepare one. When it is rendered it will be paid.

3. Mr. Christy makes note of the fact that the Committee has itemized all of its expenditures, rather than those above \$200. The Committee has submitted two reports containing this error, neither of which has been returned by Reports Examining, and therefore was unaware that it was not supposed to report in this manner. This is a case where this Committee has exhibited an excess of zeal, and all its future reports will be done correctly.

The first and third allegations in Mr. Christy's complaint are either baseless or de minimis. The inadequate reporting of the leasing arrangements between the Committee and the E. J. Boebinger Agency, Inc., which is the substance of Mr. Christy's second allegation, is the result of an unfortunate series of events which occurred within the E. J. Boebinger Agency, Inc. The Committee made sincere efforts to get an invoice for using the vehicle for those 15 days, and is pursuing such an invoice with true diligence at this moment. The Committee has instituted a more formal procedure for insuring that gasoline and oil bills are segregated and paid promptly, and to report those portions of the bills which the candidate is carrying on the Committee's behalf in appropriate manner. I shall be submitting a memorandum containing more details

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but substantiated what appears in the foregoing together with affidavits from Charles Greener and John Mr. Greener is the Campaign Manager and Mr. Rosenberg is Vice-President and Director of Finance for the S. J. Agency, Inc. In addition, Mr. Greener's affidavit with appendices thereto photocopies of receipts and checks which substantiate our position. Finally, we will be submitting amended Schedule Cs for the two reports previously submitted, to reflect the fact that the candidate has effectively advanced credit to the Committee in the form of gasoline and oil charges.

The fifteenth day from the date the Committee received your letter is Friday, June 23, 1980. I expect to have all of the materials to you in advance of that, and, in fact, would hope to be in Washington to discuss them with you even before that time. Please let me know if there is any additional information or any additional types of substantiation which you feel you will need to process this case. In any event, I look forward to meeting with you.

Very truly yours,


GORDON M. STRAUSS

GMS:vmp

CC: McEwen for Congress Committee

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600403093

CHARLES A. THORNTON
FREDERICK M. SCARBOROUGH
FRANCIS A. WYLLIE
DAVID E. BOHANNAN
BENJ. A. HITES
R. GUY TAYLOR
CORDON M. STRAUSS
DAVID ROSENBERG

508840

General Counsel
Federal Election Commission
Washington, D.C. 20463

Attention: Maura White, Esq.

RE: MUR 1243; McEwen for Congress Committee

Dear Ms. White:

Enclosed is the McEwen for Congress Committee's Memorandum in response to the complaint filed by James Christy on May 30, 1980, the above-captioned MUR 1243. It essentially recapitulates the positions taken in my letter of June 19, 1980, but contains the substantiating materials which were unavailable to me at that time.

We appreciate the additional time which you made available for us to collect and submit the materials contained herein. It is our sincere belief that these materials do, in fact, support our contention that the McEwen for Congress Committee has not engaged in any violation of the Federal Election Campaign Act, as amended, with the exception of several improperly reported extensions of credit by the candidate to the Committee. We have endeavored to correct those errors and instituted stricter procedures to ensure that this kind of problem does not arise in the future.

I might also note that the Babinger Agency, Inc. has done pretty much the same thing, for its part. Although it is not mentioned in the attached affidavits, the agency's prior accountant is apparently under indictment at this time for having failed to file his own tax returns along with those of the agency and several other clients. That is a very tragic affair for all concerned, as I am sure that you understand.

In any event, if the enclosed Memorandum and its attachments are in any way less than what you feel you might need in order to resolve the matter, please do not hesitate to contact me immediately. I shall be at the Republican National Convention in Detroit between July 7, 1980 and July 18, 1980, but I will be

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... a day on which ...

... very much for your assistance and ... in

Very truly yours,

Gordon M. Straub
GORDON M. STRAUB

GIS:lw
cc: McEwen for Congress Committee
Robert Eschelman, Esq.

800403094

McEWEN FOR CONGRESS
P.O. Box 1
Hillsboro, Ohio 45133

MUR 1243

MEMORANDUM

The McEwen for Congress Committee (hereafter "the Committee") submits herewith its Memorandum in response to the Complaint filed by James Christy in the above-captioned MUR, on May 30, 1980. The Committee has conducted a thorough investigation of the allegations contained in that Complaint, and respectfully submits that, with the exception of two errors in its reporting procedures, the facts and circumstances surrounding these allegations do not support any finding that there is reason to believe that the Committee has violated the Federal Election Campaign Act, as amended. The Committee has consistently applied its best efforts to the work of obtaining and reporting all information necessary, and has worked consistently toward maintaining the highest possible level of compliance with the law. Where the investigation into the Complaint's three allegations has revealed deficiencies, the Committee has moved expeditiously to make appropriate corrections.

Each of the allegations is treated in detail, *infra*, and supported with appropriate documentation. If additional information is necessary, the Committee will be pleased to provide it forthwith.

A. NRCC Candidates' Conference

The National Republican Congressional Committee's Candidate Conference is a regularly-scheduled event, sponsored by the NRCC as a method of strengthening incumbent and non-incumbent Congressional candidates' showings in the general elections. Its history and purposes are succinctly described in the preamble of Advisory Opinion 1975-87, CCH Federal Election Campaign Guide ¶5178 (hereafter "CCH"), and the specific content of the conference held this year is outlined in Appendix A of the Affidavit of Charles Greener (Exhibit 1). As alleged in the Complaint, Mr. McEwen and his wife attended the Conference from February 17, 1980 to February 20, 1980.

virtue of the Commission's Regulations, 11 C.F.R. §106.3(d), and the Commission's Advisory Opinion 1975-87 (AO 1975-87), *supra*, specifically exempted disbursements from reporting requirements. §106.3(d) exempts costs for travel between Washington and a candidate's constituency from being reported unless these costs are paid from campaign funds. (As the Commission is aware, there is currently pending before Congress a new set of Regulations which includes a slight modification of §106.3(d); the thrust of the new, however, is no different from that of the old.)

While §106.3(d) deals only with travel, AO 1975-87 goes further with respect to the NRCC Conference. It acknowledges the presence of spouses as well as candidates (CCH 45178, at page 10, 120) and exempts the cost of food and lodging for the NRCC Conference, if these costs are paid from the candidate's personal funds. The AO states, in pertinent part:

While expenses for the candidate's travel would be exempt, other costs such as meals or hotel accommodations which are incurred in relation to the forum must be characterized as expenditures within the meaning of 2 U.S.C. 431(f) and 18 U.S.C. 591(f) unless they are paid for from a candidate's personal funds.

AO 1975-87, *supra*, at page 10, 122.
(Emphasis supplied).

This Advisory Opinion, and the allocations regulations which underlie it (Part 106) were intended to eliminate the advantage enjoyed by an incumbent congressman who maintains a residence in Washington D.C.. Furthermore, travel between a congressman's district and his Washington office -- when conducted for non-campaign matters -- were also to be exempted under the rationale of §106.3(d). At the time the regulation was adopted, reporting requirements were a lesser problem than the then-tant expenditure limits applicable to congressional campaigns. (See former 18 U.S.C. §591 *et seq.*, particularly 18 U.S.C. §608.) An incumbent candidate and his or her spouse would be able to attend the subject conference without incurring reportable, and more importantly, chargeable, expenditures. AO 75-87 removed this inequity.

Mr. McEwen relied on AO 75-87 both in attending and in declining to be reimbursed from his campaign committee for attending the NRCC Conference this year. We respectfully submit

to the Commission...
Opinion was...
to rely upon...
provisions of...
at 11 C.F.R. §114.9(e)(2)...
allegation be dismissed.

B. Mobile Van Rental

Mr. Christy's second allegation notes the absence of any reference to the use of a mobile van for campaign purposes during the primary election period. The van in question was leased by the Campaign Committee on sixteen separate days between February 1, 1980 and June 5, 1980, from the Boebinger Agency, Inc., a large real estate company in eastern Ohio. The Boebinger Agency (the Agency) has owned the subject vehicle for three years (See Affidavit of John Boebinger, Exhibit 2) It is utilized in its business. Through a series of unfortunate, even tragic, events, the Boebinger Agency did not present an invoice to the Committee until June 25, 1980. (See page F 1 and F 2, Appendix F to Affidavit of Charles Greener, which is Exhibit 1.) Both parties, however, fully contemplated that this arrangement would be executed in accordance with the law, and that the Committee would reimburse Boebinger for the reasonable rental value of this van.

The Agency assigned the job of calculating and preparing appropriate invoices for the use of the vehicle to its accountant. Unfortunately, the Agency and its accountant were and are in the process of going through a very trying time. The accountant, for reasons unknown to the undersigned, has been failing to file income tax returns both for himself and for the Agency for a period of several years. As the attached affidavit of John Boebinger indicates, the Agency went through an extensive audit by the Internal Revenue Service with the result that it had to pay a \$1000 penalty for failure to file tax returns in three years. The Agency has transferred its account to Ernst & Whinney, who have been working for months to reconstruct the books and re-establish an orderly accounting process for the company. As a result of all these problems, the Agency was unable to prepare the invoice until this late date, and therefore the Committee was unable to pay it.

The invoice has been received and paid by the Committee as of this date. The amount of the invoice reflects the Agency's investigation into the cost of renting a comparable vehicle for comparable periods of time and for comparable mileage.

Although it is indeed unfortunate that the bill was so late in being rendered for these reasons, the bill, itself, is precisely what is contemplated by the Act and the Regulations, at 11 C.F.R. §114.9(e)(2). The Committee is particularly sensitive to the potential pitfalls in the utilization of corporate facilities, and has made extensive efforts to insure that no corporate contributions result. Thus, Mr. Greener not only arranged for a leasing

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stantly... charges... Campaign Committee... method by which this reimbursement has been made may not be all fours with the requirements of 11 C.F.R. §104, but, nevertheless, the Committee has been making substantial reimbursements for the gasoline and oil charges attributable both to the van and to all other campaign-related travel. In the course of our investigation, it became apparent that the gasoline and oil bills attributable to the van had been being paid along with gasoline and oil bills attributable to other vehicles utilized on the Committee's behalf.

The Committee feels obliged to indicate that the method of reimbursement which it has been utilizing should probably have been reported differently from the way it was. As a consequence, Exhibit 3, attached hereto, contains two amended reports which conform to the reality of the circumstances. The Committee's practice had been to reimburse either the candidate or the oil companies, on the basis of invoices presented by the candidate. The candidate has been, in effect, extending personal credit to the Committee by virtue of charging all campaign-related gasoline and oil to his personal credit card and then receiving reimbursement subsequently. Inasmuch as this appears to be a debt or obligation of the Committee, the Committee has amended its two previously filed reports in order to reflect this situation. These amended reports indicate the extent of the credit outstanding, and the amounts of reimbursement made to date. For the first quarter the amount owed was \$916.52. For the period covered by the pre-primary report, the Committee made \$850 worth of reimbursements and incurred an additional \$620.97 of liability. As a result, the amount of outstanding liability which should have been reported was \$687.49, with respect to the pre-primary report. These changes have been made and are submitted herewith to correct the record.

In summary, as to this portion of the Complaint, the Committee regrets the unavoidable delay in obtaining from the Boebinger Agency, Inc. an appropriate invoice for the use of the mobile van, but the Committee made its best efforts to obtain that information and, as a matter of fact, paid the invoice immediately upon receipt thereof. As the attached affidavits indicate, both parties contemplated a businesslike arrangement from the very beginning. The Agency has been experiencing severe difficulties in all its business operations as a consequence of its accountant's incompetence, including the payment of a \$1000 penalty to the Internal Revenue Service, but appears now to have gotten its affairs more in order with the assistance of its new

...to be reported as required by law, and ...
...and ...
...rates applicable to this type of transaction, and
to say, it will be reported appropriately. But, we will
line that the Committee and the Agency had always contacted
an arm's length business transaction and that the only reason
these arrangements did not appear in earlier reports was the
Agency's inability to bill the Committee.

C. Itemized Expenditures.

The Complaint makes note of the fact that the Committee itemized all its expenditures on Schedule B, rather than just those above \$200. Both the Committee's reports contained this error and neither was returned by Reports Examining, with the result that the Committee was unaware that this excessive reporting was unacceptable. All the Committee's future reports will contain itemized expenditures reported in accordance with §104 of the Regulations, and will not itemize more disbursements than those which are required.

In conclusion, the Committee respectfully requests that the Commission find no reason to believe that there has been a violation of the Federal Election Campaign Act, as amended. The National Republican Congressional Committee's Candidates Conference is sui generis in that it is not a reportable event when the expenses are paid from a candidate's personal funds. That was the case in this instance, and the non-reporting is supported by the Commission's Regulations and AO 1975-87. The Committee was unable to get an invoice from the Boebinger Agency, Inc. for the use of the van, as a result of an accountant who is, upon my information and belief, currently under indictment for tax evasion. Clearly, the Agency has suffered substantially as a consequence of this accountant's incompetence, which has created problems for the campaign as well as for the Agency. The Committee, however, has always made its best efforts to comply with the law and has rectified not only the lack of an invoice but also the inadequate reporting of the credit extended by the candidate. The Committee is pleased to make this voluntary disclosure, which came to light in the course of our investigation into the second allegation of Mr. Christy's Complaint, and to ensure that the problem does not reoccur. Among other practices which the Committee is instituting as a result of this investigation is the requirement that all campaign-related gasoline and oil charges be made on a single credit card, and a strict rule that no reimbursement be made unless there exists a receipt to support the disbursement. To this end, the candidate has requested four receipts totalling \$120, in duplicate, from the Shell Oil Company as a consequence of having misplaced the originals. Note is made of this in the Appendix of Mr. Greener's Affidavit. Finally, the Committee will streamline its reports to make them conform with the law, in accordance

Cincinnati, Ohio
(513) 621-1015

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Hamilton, Ohio 45133

STATE OF OHIO

COUNTY OF HAMILTON

AFFIDAVIT OF CHARLES GREENER

Charles Greener, being duly sworn and cautioned, states for his Affidavit as follows:

1. I am the Campaign Manager for the McEwen for Congress Committee, and have primary responsibility over all its activities and its records. I have been employed in this capacity since February 15, 1980. This Affidavit and all the attachments hereto are submitted in response to the Complaint filed by James Christy in MUR 1243.

2. The McEwen for Congress Committee (hereafter the Committee) made reimbursement neither to the Candidate nor to any hotel with respect to the Candidate's conference sponsored by the National Republican Congressional Committee, February 17, 1980 to February 21, 1980. Attached hereto as Appendix A are photocopies of the American Express invoice sent to the Candidate, personally, and paid by the Candidate, personally, together with a copy of the check by which this bill was paid, as well as copies of materials relevant to the NRCC Conference. The check is drawn on the personal account of the Candidate, Robert McEwen.

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The Committee has consistently been receiving gasoline and oil charges for the use of that van, and has assumed the obligation of paying for these bills along with all other gasoline bills for campaign-related travel. Attached hereto as Appendix C are photocopies of Form 3, Schedule B, pages 2 of 6 and 6 of 6, for the pre-election report filed on May 19, 1980. Please note lines B and C on page 2 of 6 and line D on page 6 of 6 contain specific designations of reimbursements made for travel expenses. Attached hereto as Appendix D are photocopies of the gasoline receipts attributable solely to the subject van, which were rendered to the Committee on the dates when the gasoline was purchased.

7. The campaign's normal procedure for reimbursing these travel expenses for gasoline and oil, has been that the Candidate or the Candidate's wife has purchased the gasoline via personal credit cards, and the campaign has reimbursed either the Candidate or the oil company directly, after the Candidate has received a monthly statement and presented it to the Committee. Payments to the Candidate or to the oil company have not always been in the full amount of the statement, but were in excess of the "minimum bill" contained on the face of the statement. Attached hereto as Appendix E are photocopies of all campaign-related gasoline purchases on the aforementioned credit cards, including of the cards attributable solely to the van which were previously segregated out for the Commission's convenience. The total amount of gasoline and oil charges incurred on the Committee's behalf in the period

by the following items:
reimbursements broken out as follows:

	DATE	AMOUNT
Charged to Sohio Credit Card	028-104-274-0	\$750.49
Charged to Shell Credit Card	686-684-602	459.49
Charged to Union 76 Credit Card	2-8850-2867	<u>347.51</u>
		1,557.49
Paid to Sohio		300.00
Paid to Shell		350.00
Paid to Robert McEwen		<u>200.00 (for Union 1976)</u>
		850.00

8. The difference between the amounts purchased and the amounts of reimbursement appear to constitute credit extended to the campaign by the Candidate. To the extent that this credit should have been reported on Schedule C for the reports filed on April 10, 1980 and May 19, 1980, these reports have been amended and the amendments are being submitted concurrently with the submission of this Affidavit, upon my information and belief. All future reports will reflect properly any such credit being extended by the Candidate. Furthermore, very strict controls over the purchase of gasoline and the payment therefor are being instituted, so that this type of situation shall not reoccur.

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...consistently tried to comply with
of the Federal Election Campaign Act, as amended. It will continue to make
its best efforts to comply with the law.

Further the Affiant oath sought.

Charles Greener
Charles Greener

Subscribed and sworn to before me by the said Charles Greener
this 27th day of June, 1980.

Gordon M. Strauch
Notary Public
GORDON M. STRAUCH, Attorney at Law
NOTARY PUBLIC, STATE OF OHIO
My Commission expires on 12/31/82
Pub. Section 4705 O.R.C.

80040203106

ROBERT P. ESHELMAN
JAMES H. BRIDGES
E. LONG STAYL
J. BERN BETHAN
JACK N. BAKER
WILLIAM S. BACON
JEFFREY A. WHITE
SHEILA M. HARRIS
JAMES E. BLAKE
FRED H. BOLLINGER, JR.
JOHN H. BRANCO

Gordon M. Strauss, Esq.
Steer, Strauss, White & Tobias
2208 Central Trust Tower
Cincinnati, Ohio 45202

Dear Mr. Strauss:

I enclose the bill of Boebinger Agency, Inc. in the amount of \$969.10 covering 16 days use of the motor home of Boebinger Agency, Inc. at the rate of \$50.00 per day and at the rate of \$.10 per mile. I also enclose the Affidavit of John B. Boebinger with respect to the transaction out of which the leasing of the motor home arose. I hope that these will serve their purpose. There is no doubt in my mind but that the corporation expected to be paid for the use of the motor home.

Very truly yours,

Robert P. Eshelman
Robert P. Eshelman

RPE:mj

Enclosures

CC: Mr. Charles Greener

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Boebinger
REALTORS

Rate per hour
use per mile

Miles	Date
42	2-1-80
80	2-15-80
72	2-29-80
120	2-23-80
80	3-6-80
90	3-13-80
75	3-27-80
72	4-12-80
160	4-26-80
224	5-1-80
50	5-3-80
80	5-7-80
75	5-29-80
105	5-31-80
125	6-2-80
	6-6-80

6004000

EXECUTIVE OFFICE:
4920 Hills and Dales, N.W.
CANTON, OHIO 44708
216-478-0051

BRANCH OFFICES:
1900 West Market St.
AKRON, OHIO 44318
216-867-9550

760 West State Street
ALLIANCE, OHIO 44601
216-823-3450

308 E. Cherry Street
CANAL FULTON, OHIO 44314
216-854-2231

2618 Fulton Dr., N.W.
CANTON, OHIO 44718
216-455-0345

750 Graham Road
CUYAHOGA FALLS, OHIO 44221
216-929-0503

1111 Northview Drive
HILLSBORO, OHIO 45133
513-393-2651

921 Lincolnway, East
MASSILLON, OHIO 44846
216-837-8377

3803 Wales Rd. N.W.
JACKSON TWP., OHIO 44640
216-833-1001

800 N. Main Street
NORTH CANTON, OHIO 44720
216-494-7800

2825 Edison St., N.W.
UNIONTOWN, OHIO 44685
216-699-9957

COMMERCIAL INVESTMENT:
4920 Hills and Dales, N.W.
CANTON, OHIO 44708
216-478-0051

PROPERTY MANAGEMENT:
4920 Hills and Dales, N.W.
CANTON, OHIO 44708
216-478-0071

Total Miles: 1,691 ----- \$169.10
Total Days: 16 ----- 800.00
TOTAL: \$969.10

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motor home; that by agreement between the motor home and McEwen for Congress Campaign Committee it was agreed that the motor home could be used by the McEwen for Congress Campaign Committee at the fair rental value as determined by the parties; that it has been determined that such fair rental value of a motor home is \$30.00 per day plus \$.10 per mile; that Boebinger Agency, Inc. and its officers were aware that the use of said motor home had to be billed monthly and at all times intended to bill for the use of such motor home after the extent of its use had been determined.

Affiant further says that it was agreed between himself and Charles Greener as Chairman of the McEwen for Congress Campaign Committee that the computation of the rental would be dependent upon the depreciated value of the motor home and the rental at which such motor home would be available from other sources; that Boebinger Agency, Inc. had difficulty in determining the depreciated value of the motor home because of accounting problems within the agency which developed when the CPA who handled the books and records of the corporation was discharged in the spring of 1980, after it was learned that he had not filed appropriate tax returns for the corporation with the Internal Revenue Service for three preceding years which resulted in an ultimate penalty against the corporation of approximately \$1,000 for late filing; that Boebinger Agency, Inc. transferred its account to Ernst & Whinney in the spring of 1980; that, because of the problems occasioned by the accounting firm previously handling the Boebinger account and the gathering and transfer of records to Ernst & Whinney and further by reason of the difficulties with Internal Revenue Service relating to the penalty and problems presented by the failure of the accountant to file tax returns, there has been a delay in the billing for the use of the motor home.

Affiant further states that Boebinger Agency, Inc. intended at all times to be paid for the use of the motor home in question by McEwen for Congress Campaign Committee and did not intend such use to be gratuitous.

Further affiant saith naught.

SWORN to before me and subscribed in my presence this 25th day of June, 1980.

Notary Public

000403110

CONFIDENTIAL
RECORD

Gordon Strauss, Esq.
Stear, Strauss, White and Sobieski
2208 Central Trust Tower
Cincinnati, Ohio 45202

Re: MDR 1243

Dear Mr. Strauss:

On June 4, 1980, the Commission notified you of a complaint alleging that your client, the National for Congress Committee, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act").

The Commission, on _____, 1980, determined that on the basis of the information in the complaint, and information provided by you, that there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission has closed its file in this matter. This matter will be made a part of the public record within 30 days.

If you have any questions please contact Naura White, the staff member assigned to this matter, at 202-523-4060.

Sincerely,

Charles N. Steele
General Counsel

James Christy
3378 South Milford Road
Milford, Ohio 45150

Re: NUR 1243

Dear Mr. Christy:

The Federal Election Commission has reviewed the allegations of your complaint dated May 30, 1980, and determined that on the basis of the information contained in the complaint, and information provided by the respondent, that there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended (the "Act") has been committed. Accordingly, the Commission has decided to close the file in this matter.

Should additional information come to your attention which you believe establishes a violation of the Act, please contact Maura White, the staff member assigned to this matter at 202-523-4060.

Sincerely,

Charles N. Steele
General Counsel

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General Counsel
Federal Election Commission
Washington, D.C. 20463

Attention: Maura White

RE: MUR 1243, McEwen for Congress Committee

Dear Ms. White:

Enclosed is the McEwen for Congress Committee's Memorandum in response to the complaint filed by James Christy on May 30, 1980, the above captioned MUR 1243. It essentially recapitulates the positions taken in my letter of June 19, 1980, but contains the substantiating materials which were unavailable to me at that time.

We appreciate the additional time which you made available for us to collect and submit the materials contained herein. It is our sincere belief that these materials do, in fact, support our contention that the McEwen for Congress Committee has not engaged in any violation of the Federal Election Campaign Act, as amended, with the exception of several improperly reported extensions of credit by the candidate to the Committee. We have endeavored to correct these errors and instituted stricter procedures to ensure that this kind of problem does not arise in the future.

I might also note that the Bohinger Agency, Inc. has done pretty much the same thing, for its part. Although it is not mentioned in the attached affidavits, the agency's prior accountant is apparently under indictment at this time for having failed to file his own tax returns along with those of the agency and several other clients. That is a very tragic affair for all concerned, as I am sure that you understand.

In any event, if the enclosed Memorandum and its attachments are in any way less than what you feel you might need in order to resolve the matter, please do not hesitate to contact me immediately. I shall be at the Republican National Convention in Detroit between July 7, 1980 and July 18, 1980, but I will be

July 1954
July
If this is not
a day on which
you are
away.

Thank you for your assistance

Very truly yours,

Gordon M. Stevens
GORDON M. STEVENS

Mr. Robert M. La Follette
U.S. Senate
Washington, D.C.

600402031111

Engineering Board

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BEFORE THE
FEDERAL ELECTION COMMISSION

In the matter of:

McEWEN FOR CONGRESS
P.O. Box L
Hillsboro, Ohio 45133

MUR 1243

MEMORANDUM

The McEwen for Congress Committee (hereafter "the Committee") submits herewith its Memorandum in response to the Complaint filed by James Christy in the above-captioned MUR, on May 30, 1980. The Committee has conducted a thorough investigation of the allegations contained in that Complaint, and respectfully submits that, with the exception of two errors in its reporting procedures, the facts and circumstances surrounding these allegations do not support any finding that there is reason to believe that the Committee has violated the Federal Election Campaign Act, as amended. The Committee has consistently applied its best efforts to the work of obtaining and reporting all information necessary, and has worked consistently toward maintaining the highest possible level of compliance with the law. Where the investigation into the Complaint's three allegations has revealed deficiencies, the Committee has moved expeditiously to make appropriate corrections.

Each of the allegations is treated in detail, infra, and supported with appropriate documentation. If additional information is necessary, the Committee will be pleased to provide it forthwith.

A. NRCC Candidates' Conference

The National Republican Congressional Committee's Candidate Conference is a regularly-scheduled event, sponsored by the NRCC as a method of strengthening incumbent and non-incumbent Congressional candidates' showings in the general elections. Its history and purposes are succinctly described in the preamble of Advisory Opinion 1975-87, CCH Federal Election Campaign Guide ¶5178 (hereafter "CCH"), and the specific content of the conference held this year is outlined in Appendix A of the Affidavit of Charles Greener (Exhibit 1). As alleged in the Complaint, Mr. McEwen and his wife attended the Conference from February 17, 1980 to February 20, 1980.

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OFFICE OF THE
GENERAL COUNSEL
30 JUL 2 1980

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virtue of the fact that
11 C.F.R. §106.3(d), and the Commission's
Opinion 1975-87 (AO 1975-87), supra, specifically
disbursements from reporting requirements.
costs for travel between Washington and a constituency
tuency from being reported unless these costs are paid from
campaign funds. (As the Commission is aware, there is currently
pending before Congress a new set of Regulations which includes
a slight modification of §106.3(d); the thrust of the new,
however, is no different from that of the old.)

While §106.3(d) deals only with travel, AO 1975-87 goes
further with respect to the NRCC Conference. It acknowledges
the presence of spouses as well as candidates (CGM 15178, at
page 10, 120) and exempts the cost of food and lodging for the
NRCC Conference, if these costs are paid from the candidate's
personal funds. The AO states, in pertinent part:

While expenses for the candidate's
travel would be exempt, other costs
such as meals or hotel accommodations
which are incurred in relation to
the forum must be characterized as
expenditures within the meaning of
2 U.S.C. 431(f) and 18 U.S.C. 591(f)
unless they are paid for from a
candidate's personal funds.

AO 1975-87, supra, at page 10, 122.
(Emphasis supplied) at page 10, 122.

This Advisory Opinion and the allocations regulations which
underlie it (Part 106) were intended to eliminate the advan-
tage enjoyed by an incumbent congressman who maintains a resi-
dence in Washington D.C.. Furthermore, travel between a Con-
gressman's district and his Washington office -- when conducted
for non-campaign matters -- were also to be exempted under the
rationale of §106.3(d). At the time the regulation was adopted,
reporting requirements were a lesser problem than the then-extant
expenditure limits applicable to congressional campaigns. (See
former 18 U.S.C. §591 et seq., particularly 18 U.S.C. §608.)
An incumbent candidate and his or her spouse would be able to
attend the subject conference without incurring reportable, and
more importantly, chargeable, expenditures. AO 75-87 removed
this inequity.

Mr. McEwen relied on AO 75-87 both in attending and in
declining to be reimbursed from his campaign committee for
attending the NRCC Conference this year. We respectfully submit

to the Commission that the 1980 Conference for 1980 is essentially the same conference as that for which the Advisory Opinion was requested, and that Mr. McMan is therefore not to rely upon Advisory Opinions 1975-87, in accordance with the provisions of 2 U.S.C. §4377(c) and the Commission's Regulations at 11 C.F.R. §112.5. We therefore respectfully request that the allegation be dismissed.

B. Mobile Van Rental

Mr. Christy's second allegation notes the absence of any reference to the use of a mobile van for campaign purposes during the primary election period. The van in question was leased by the Campaign Committee on sixteen separate days between February 1, 1980 and June 6, 1980, from the Boebinger Agency, Inc., a large real estate company in eastern Ohio. The Boebinger Agency (the Agency) has owned the subject vehicle for three years (See Affidavit of John Boebinger, Exhibit 2) It is utilized in its business. Through a series of unfortunate, even tragic, events, the Boebinger Agency did not present an invoice to the Committee until June 25, 1980. (See page F 1 and F 2, Appendix F to Affidavit of Charles Greener, which is Exhibit 1.) Both parties, however, fully contemplated that this arrangement would be executed in accordance with the law, and that the Committee would reimburse Boebinger for the reasonable rental value of this van.

The Agency assigned the job of calculating and preparing appropriate invoices for the use of the vehicle to its accountant. Unfortunately, the Agency and its accountant were and are in the process of going through a very trying time. The accountant, for reasons unknown to the undersigned, has been failing to file income tax returns both for himself and for the Agency for a period of several years. As the attached affidavit of John Boebinger indicates, the Agency went through an extensive audit by the Internal Revenue Service with the result that it had to pay a \$1000 penalty for failure to file tax returns in three years. The Agency has transferred its account to Ernst & Whinney, who have been working for months to reconstruct the books and re-establish an orderly accounting process for the company. As a result of all these problems, the Agency was unable to prepare the invoice until this late date, and therefore the Committee was unable to pay it.

The invoice has been received and paid by the Committee as of this date. The amount of the invoice reflects the Agency's investigation into the cost of renting a comparable vehicle for comparable periods of time and for comparable mileage.

Although it is indeed unfortunate that the bill was so late in being rendered for these reasons, the bill, itself, is precisely what is contemplated by the Act and the Regulations, at 11 C.F.R. §114.9(e)(2). The Committee is particularly sensitive to the potential pitfalls in the utilization of corporate facilities, and has made extensive efforts to insure that no corporate contributions result. Thus, Mr. Greener not only arranged for a leasing

relating to the use of the mobile van, the Committee has been able to determine what charges are attributable to the van, the Committee has consistently taken responsibility for them. Thus, all gasoline and oil charges attributable to the van are being paid by the Campaign Committee. As I indicated in my letter to Mr. White, the method by which this reimbursement has been made may not be in all fours with the requirements of 11 C.F.R. §104, but, nevertheless, the Committee has been making substantial reimbursements for the gasoline and oil charges attributable both to the van and to all other campaign-related travel. In the course of our investigation, it became apparent that the gasoline and oil bills attributable to the van had been being paid along with gasoline and oil bills attributable to other vehicles utilized on the Committee's behalf.

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The Committee feels obliged to indicate that the method of reimbursement which it has been utilizing should probably have been reported differently from the way it was. As a consequence, Exhibit 3, attached hereto, contains two amended reports which conform to the reality of the circumstances. The Committee's practice had been to reimburse either the candidate or the oil companies, on the basis of invoices presented by the candidate. The candidate has been, in effect, extending personal credit to the Committee by virtue of charging all campaign-related gasoline and oil to his personal credit card and then receiving reimbursement subsequently. Inasmuch as this appears to be a debt or obligation of the Committee, the Committee has amended its two previously filed reports in order to reflect this situation. These amended reports indicate the extent of the credit outstanding, and the amounts of reimbursement made to date. For the first quarter the amount owed was \$916.52. For the period covered by the pre-primary report, the Committee made \$850 worth of reimbursements and incurred an additional \$620.97 of liability. As a result, the amount of outstanding liability which should have been reported was \$687.49, with respect to the pre-primary report. These changes have been made and are submitted herewith to correct the record.

In summary, as to this portion of the Complaint, the Committee regrets the unavoidable delay in obtaining from the Boebinger Agency, Inc. an appropriate invoice for the use of the mobile van, but the Committee made its best efforts to obtain that information and, as a matter of fact, paid the invoice immediately upon receipt thereof. As the attached affidavits indicate, both parties contemplated a businesslike arrangement from the very beginning. The Agency has been experiencing severe difficulties in all its business operations as a consequence of its accountant's incompetence, including the payment of a \$1000 penalty to the Internal Revenue Service, but appears now to have gotten its affairs more in order with the assistance of its new

... that it was the Commission's intention that it was, in fact, the Committee's efforts to obtain and to report all expenditures as required by law, and as contemplated specifically in 2 U.S.C. (a) and 11 C.F.R. §102.9(d). All future use of the van will be billed promptly thereafter, on the basis of the normal commercial rates applicable to this type of transaction, and, to say, it will be reported appropriately. But, we wish to underline that the Committee and the Agency had always contemplated an arm's length business transaction and that the only reason these arrangements did not appear in earlier reports was the Agency's inability to bill the Committee.

C. Itemized Expenditures.

The Complaint makes note of the fact that the Committee itemized all its expenditures on Schedule B, rather than just those above \$200. Both the Committee's reports contained this error and neither was returned by Reports Examining, with the result that the Committee was unaware that this excessive reporting was unacceptable. All the Committee's future reports will contain itemized expenditures reported in accordance with §104 of the Regulations, and will not itemize more disbursements than those which are required.

In conclusion, the Committee respectfully requests that the Commission find no reason to believe that there has been a violation of the Federal Election Campaign Act, as amended. The National Republican Congressional Committee's Candidates Conference is sui generis in that it is not a reportable event when the expenses are paid from a candidate's personal funds. That was the case in this instance, and the non-reporting is supported by the Commission's Regulations and AO 1975-87. The Committee was unable to get an invoice from the Boebinger Agency, Inc. for the use of the van, as a result of an accountant who is, upon my information and belief, currently under indictment for tax evasion. Clearly, the Agency has suffered substantially as a consequence of this accountant's incompetence, which has created problems for the campaign as well as for the Agency. The Committee, however, has always made its best efforts to comply with the law and has rectified not only the lack of an invoice but also the inadequate reporting of the credit extended by the candidate. The Committee is pleased to make this voluntary disclosure, which came to light in the course of our investigation into the second allegation of Mr. Christy's Complaint, and to ensure that the problem does not reoccur. Among other practices which the Committee is instituting as a result of this investigation is the requirement that all campaign-related gasoline and oil charges be made on a single credit card, and a strict rule that no reimbursement be made unless there exists a receipt to support the disbursement. To this end, the candidate has requested four receipts totalling \$120, in duplicate, from the Shell Oil Company as a consequence of having misplaced the originals. Note is made of this in the Appendix of Mr. Greener's Affidavit. Finally, the Committee will streamline its reports to make them conform with the law, in accordance

STEER, STRAUSS, WHITE & TOBIAS
2200 CENTRAL TRUST TOWER
CINCINNATI, OHIO 45202
(513) 621-1045

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STATE OF OHIO }
COUNTY OF HAMILTON }

AFFIDAVIT OF CHARLES BREWER

Charles Brewer, being duly sworn and cautioned, states for his Affidavit as follows:

1. I am the Campaign Manager for the McEwen for Congress Committee, and have primary responsibility over all its activities and its records. I have been employed in this capacity since February 15, 1980. This Affidavit and all the attachments hereto are submitted in response to the Complaint filed by James Christy in HR 1243.

2. The McEwen for Congress Committee (hereafter the Committee) made reimbursement neither to the Candidate nor to any hotel with respect to the Candidate's conference sponsored by the National Republican Congressional Committee, February 17, 1980 to February 21, 1980. Attached hereto as Appendix A are photocopies of the American Express invoice sent to the Candidate, personally, and paid by the Candidate, personally, together with a copy of the check by which this bill was paid, as well as copies of materials relevant to the NRCC Conference. The check is drawn on the personal account of the Candidate, Robert McEwen.

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Boebinger Agency, Inc., it was the intention of both parties beginning with the Boebinger Agency, Inc. would bill the Committee for the rental value of such a van in the Sixth Congressional District of California that the Committee would pay such bill within a commercially reasonable time after it was rendered. This arrangement was established prior to my use by the Committee of the subject van. The arrangement were verbal, but are corroborated in the Affidavit of John Boebinger, Vice-President of the Boebinger Agency, Inc. Furthermore, I made a second express request, verbally, for an invoice for usage to date, on or about March 1, 1980. This invoice has finally been presented to the Committee (Appendix F) and has been paid. The rates charged therein, upon my information and belief, are comparable to those charged by commercial lessors of the same or similar vehicles for this amount of time and usage. The Committee has paid the invoice in the full amount of \$969.10, representing 16 days at \$50.00 per day and 1,691 miles at 10 cents per mile. Although the parties had initially believed that some measure of depreciation on the van should be computed as part of the rental value, no such computation is included in the amount actually billed and paid.

4. Upon my information and belief, the reason no invoice had been rendered by the Boebinger Agency, Inc. is that it was experiencing internal, accounting problems as a result of its' former accountant's incompetence and indictment for tax evasion.

5. The Committee utilized the subject van on 16 days between February 1, 1980 and June 6, 1980. (The vehicle is currently being repaired

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6. The Committee has consistently been receiving gasoline and oil charges for the use of that van, and has assumed the obligation of paying those bills along with all other gasoline bills for campaign-related purposes. Attached hereto as Appendix C are photocopies of Form 3, Schedule B, pages 2 of 6 and 6 of 6, for the pre-election report filed on May 19, 1980. Please note lines B and G on page 2 of 6 and line D on page 6 of 6 contain specific designations of reimbursements made for travel expenses. Attached hereto as Appendix D are photocopies of the gasoline receipts attributable solely to the subject van, which were rendered to the Committee on the dates when the gasoline was purchased.

7. The campaign's normal procedure for reimbursing these travel expenses for gasoline and oil, has been that the Candidate or the Candidate's wife has purchased the gasoline via personal credit cards, and the campaign has reimbursed either the Candidate or the oil company directly, after the Candidate has received a monthly statement and presented it to the Committee. Payments to the Candidate or to the oil company have not always been in the full amount of the statement, but were in excess of the "minimum bill" contained on the face of the statement. Attached hereto as Appendix E are photocopies of all campaign-related gasoline purchases on the aforementioned credit cards, including of the cards attributable solely to the van which were previously segregated out for the Commission's convenience. The total amount of gasoline and oil charges incurred on the Committee's behalf in the period

consistently tried to comply with the provisions of the Act, as amended. It will continue to do so in the future.

Further, the effect will be sought.

Charles H. Greener
Charles Greener

Subscribed and sworn to before me by the said Charles Greener

On this 27th day of June

, 1980.

Gordon M. Strauss

Notary Public

GORDON M. STRAUSS, Attorney at Law
NOTARY PUBLIC - STATE OF OHIO
My Commission has no expiration date. Section 147.03 O.R.C.



8004003126

Dear Workshop Participants:

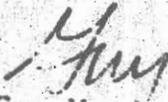
Welcome to the February session of the 1982 Congressional Candidates Workshop. We are pleased that you are able to attend this series of candidate briefings, and we hope you find the next four days a worthwhile investment of your time.

Neither we nor the NRCC staff would have taken you away from your important campaigning at home if we weren't confident that the Workshop can offer you the critical assistance that leads to a winning effort. Between the two of us, we have been campaigning for over thirty years for state and Federal office, and we know from experience that the complexities of successful campaigning demand near-perfect orchestration of hundreds of interrelated pieces. While the campaign staff has to make certain all these pieces fit together, it will be wasted effort unless the candidate -- the key piece -- knows how to be a candidate and can perform that role with precision. The objective of this Workshop is to provide you with the awareness and confidence it takes to be a candidate who can win.

There are no "sure" ways to win, but we believe the talent we have assembled for you over the next several days offers some of the finest guidance available in politics today. With three Special Election victories since February 1979 in tough Congressional Districts, we think we just may have hit upon some ideas that can help you, as well.

During the Workshop, we trust you will use your time to the maximum and take full advantage of our staff in helping you become a better campaigner.

Good luck!


Guy Vander Jagt, M.C.
Chairman
NRCC

Best regards,


Joel Pritchard, M.C.
Vice Chairman, Education &
Training, NRCC

A-2

VICE CHAIRMEN

Robin Beard, M.C., Tennessee
Lawrence Coughlin, M.C., Pennsylvania
Norman Lent, M.C., New York
Trent Lott, M.C., Mississippi
Joel Pritchard, M.C., Washington
John Rouselet, M.C., California

SECRETARY

EXECUTIVE COMMITTEE

Edwin B. Belluck, Jr., M.C., Arkansas
Clarence J. Brown, M.C., Ohio
Edward Dowd, M.C., Illinois
Charles Dougherty, M.C., Pennsylvania
David F. Emery, M.C., Maine
Edwin S. Foraythe, M.C., New Jersey
Neal Gingrich, M.C., Georgia
James G. Martin, M.C., North Carolina

A summary of the week's activities will be provided to you at the end of the workshop.

All sessions will be in the hotel with the exception of the morning and early afternoon when we will be at the Capitol. The NRCC offices in the Eisenhower Republican Center, 400 Capitol Hill will be provided to and from Capitol Hill for the group.

Because the group is large and we will be running a tight schedule, it is important that you be prompt for all sessions and meals - we appreciate your fellow attendees will appreciate this consideration.

While we recognize the temptation to accomplish other campaign-related business during your stay in Washington, we strongly urge that you postpone other appointments and meetings Thursday afternoon or Friday following the conclusion of the Workshop.

It will be helpful if you wear your name tag at all times - it makes it easier for staff, Members of Congress, PAC reps and your fellow attendees to know and remember who you are.

Staff of the NRCC

The following Campaign Division staff will be present during most or all of the Workshop:

- | | |
|----------------|--|
| Nancy Sinnott | Director |
| Rick Carson | Associate Director/FACs and Training Programs |
| Ladonna Y. Lee | Associate Director/Political Affairs |
| Fred Asbell | Field Director |
| Sky Baab | Field Director |
| Ed Goess | Field Director |
| March Miller | Field Director |
| Anne Stanley | Field Director |
| Gail Campbell | Office Manager |
| Polly Minor | Assistant to the Associate Director for FACs and Training Programs |
| Molly Malone | Assistant |
| Nancy Wilson | Assistant |

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Congressional Participation and Speakers

Short biographical sketches on the Members of Congress participating in the Workshop as well as Congressional wives, staff and consultants involved in the presentations can be found following the tab marked "Faculty".

Meeting Room Locations

Most sessions in the hotel will be held in rooms on the Plaza level or in meeting auditoriums on the First Floor. The Wednesday program at the Capital Club will be in the Main Dining Room and at the Eisenhower Republican Club in the Fourth Floor conference rooms.

Meals

The candidate's registration fee covers the following meals (for candidate and spouse): Monday lunch and dinner; Tuesday lunch, reception and dinner; Wednesday lunch and dinner; Thursday lunch. Although breakfast is not included, coffee, juice and Danish will be served each morning in the meeting room.

Spouse Participation

Candidate spouses are strongly encouraged to participate in all sessions with the candidates. Two special sessions are scheduled: "Image Awareness" and "Roles to Play in the Campaign" (see full agenda for days and times). Spouses also may participate in the video taping session on Thursday morning.

Following the "Roles" discussion on Tuesday, candidate wives have been invited to join the Congressional wives at a luncheon sponsored by the Republican Congressional Wives Club. This luncheon, with ex-CIA Director William Colby and CBS Pentagon Correspondent Ike Pappas as featured speakers, will take place in the Rayburn House Office Building (Room B-338). Transportation will be provided.

Congressional Reception and Dinner

A cocktail reception and dinner will be held in your honor Tuesday evening at the hotel. All Republican Members of Congress have been invited to attend. Dress is informal.

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...will be provided a diagram of the room indicating the location of each table along with brief background information on each. You will remain at your assigned table as that PAC reps interested in your campaign will be able to locate you. In advance of this meeting you will be given a list of expected PAC attendees. Spouses should plan to attend.

Concluding Session on Thursday

The last session of the Workshop is designed to enable you to get remaining questions answered and discuss specifics of your campaign on a one-on-one basis with staff. Legislative specialists from the House of Representatives also will be present to talk over particular issues and bills which are important to your campaign. Video equipment will be available for those who wish to brush up on their speaking skills and image projection; consultant Nancy Thompson will be on hand to offer comments and suggestions.

If you are running against an incumbent and plan to debate him/her during the campaign, Congressman John Rousselot (CA 26) will assume the identity of your opponent and debate with you during this time period on Thursday. Sign up with Polly Minor by Monday evening if you are interested in this exercise.

Evaluation of Workshop

You will find an evaluation form in the "Agenda" section on which you can critique the sessions and offer comments and suggestions. Please take time to complete the form as the meeting progresses -- this feedback is most helpful in planning future workshops. Leave the completed form with an NRCC staffer before you head back home.

Messages

Phone messages not left with your room may be directed to the Workshop registration desk through the hotel operator. These messages will be delivered to you during breaks in the program.

Phone Numbers

During your stay in Washington, you may have need for the following telephone numbers:

Campaign Division, NRCC	479-7050
Capitol Hill Club	484-4590
Republican National Committee	484-6500
Capitol Switchboard (for House and Senate offices)	224-3121
Stouffer's Hotel	979-6800

After you leave the Workshop, staff of the NCC will continue to be available to assist your campaign. Below are phone numbers for some of the divisions within the NCC:

- Campaign Division 479-7000
- Communications Division 479-7000
- Editorial Services 479-7000
- Audio Visual Services 479-7000
- Executive Director 479-7000
- Finance & Administration 479-7000
- Legal Division 479-7000
- Research Division 479-7000

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John ...	PA	2	Kevin ...	PA	2
Paul ...	PA	13	Gene ...	PA	1
Ida ...	PA	21	Mary ...	PA	1
Anne ...	PA	5	Bob ...	PA	1
Ray ...	PA	6	L.A. ... (Barbara)	PA	14
Jeff ...	PA	8	Arthur ...	PA	3
John ...	PA	10	Ruth ...	PA	12
Barry ...	PA	4	Fredrick ...	PA	11
Jim ...	PA	12	Ernest ... (Norma)	PA	2
Walter ... (Irene)	IL	5	Jack ...	PA	17
Darwin ...	PA	9	Dennis ...	PA	7
James ...	PA	6	Martin ...	PA	11
William ...	PA	2	Larry ...	IL	3
Al ...	FL	11	Newton ... (Gabriele)	PA	8
Robert ...	LA	2	Laurel ...	PA	5
Jim ... (Helen)	PA	8	Sheila ... (Bob Kennedy)	PA	11
Luther ...	PA	12	Dennis ...	NJ	14
Dennison ...	CT	5	Mildred ... (Donald)	PA	6
Don ...	SD	2	Kirk ...	PA	12
Marsha Ann ...			Louis ...	NY	17
(mother, Esther)	IL	2	Donald ...	IA	4
Bill ...	NC	11	Michael ...	IL	11
Clarence ...	IN	11			
Thurman ...	NC	4			
Richard ... (Barbara)	AZ	2			

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CONGRESSIONAL

Sunday

5:30-7:00
7:30-9:00
8:30-9:00

Registration
Introduction
Workshop
Keynote Address: Your Challenge and Opportunity in 1980

Monday, February 19th

8:15-8:30 am
8:30-9:30
9:30-10:30
10:45-12:15 pm
12:30-1:30
1:45-3:00
3:15-4:30
BREAK
6:00-7:00
7:15-7:45
7:45-9:00

Continental Breakfast
A Winning Campaign: Elements of Strategy, Theme and Plan
Polls: What they tell you and how to use them
Lunch
Organization: People and Tactics
Issue and Opposition Research
Dinner
The National Media Project
The National Mood: What are the People Thinking?

Tuesday, February 19th

8:15-8:30 am
8:30-10:30
10:45-12:00 pm
12:15-1:15
1:30-5:15
BREAK
6:00-6:45
6:45-8:00
8:15-9:30

Continental Breakfast
Finances: Raising and Budgeting Your Funds
Political Action Committees: Solicitation Tips
Lunch
Communications Workshop: Basics of Media; Values and Rhetoric; Speech Making; Sharpening Skills
Informal Congressional Reception
Dinner with Members of Congress
Regional Discussion Groups

Wednesday, February 20th

8:30-9:30 am
9:45-10:45
10:45-11:45
11:45-12:30 pm
12:30-1:15
1:30-2:30
3:45-5:45
6:15-7:15
7:30-9:30

Informal Breakfast with PAC Representatives
The Economy as an Issue
Energy as an Issue
Foreign Policy as an Issue
Lunch
What Really Worked for Me: Key Elements to the First Victory
Video Workshop; Campaign Law
Dinner
Campaign Law; Video Workshop

Thursday, February 21st

8:15-8:30 am
8:30-9:30
9:30-12:00 pm

Continental Breakfast
Putting the Pieces Together
Tying Up Loose Ends

*see full agenda for sessions for spouses

Mr. John B. Boehliger
4920 Hills and Dale Road
Canton, Ohio 44705

Dear John:

This is to reiterate our request for an
invoice for usage of the mobile home.

I've enclosed an up-to-date record of
the days and mileage for the van with respect to
campaign activities.

Thanks again for your assistance.

Sincerely yours,

Chuck Greener
Campaign Manager

/lh
Enclosure

February 1 - ... of District ...
February 16 - Clinton County Lincoln Day Dinner, ... 75 miles
February 23 - Clermont County Lincoln Day Dinner, ... 75 miles
February 29 - Ross County Lincoln Day Dinner, Chillicothe, 80 miles
Total Mileage for February, 1980 - 435 miles

March 6 - Scioto County Lincoln Day Dinner, Portsmouth, 120 miles
March 13 - Adams County Lincoln Day Dinner, 80 miles
March 27 - Clermont County Candidate's Debate, Mt. Carmel, 90 miles
Total Mileage for March, 1980 - 290 miles

April 12 - Coffee at Fraley and Lewis homes, Batavia, 75 miles
April 26 - Piketon Dogwood Festival, 72 miles
Total Mileage for April, 1980 - 147 miles

May 1 - Tour of Fayette and Clermont County, 160 miles
May 3 - Tour of Warren County, and to Williamsburg, 224 miles
May 7 - Fayette County Candidate's Debate, Washington C.B., 50 miles
May 29 - Adams County Reception, Manchester, 80 miles
May 31 - Tour of Clermont County, 75 miles
Total Mileage for May, 1980 - 589 miles

June 2 - Tour of Clermont County, 105 miles
June 6 - Scioto County, Wheelersburg Strawberry Festival, 125 miles
Total Mileage for June, 1980, to date - 230 miles

435 Miles for February
290 Miles for March
147 Miles for April
589 Miles for May
230 Miles for June
1691 Miles Total to Date

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Name of Committee			
McEwen Campaign Committee			
A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Metropolitan Outdoor Media 108 Dixie Terminal Bldg. Cincinnati, Ohio 45202	Billboard Rental Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/16/80	\$1,260.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bob McEwen 236 Woodland Drive Hillsboro, Ohio 45133	Reimbursement for Travel Expenses Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/1/80	\$200.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Gary Curran 323 N. High St. Hillsboro, Ohio 45133	Reimbursement for Expenses Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/15/80	\$99.19
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
U. S. Post Office North High Street Hillsboro, Ohio 45133	Postage Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/17/80	\$150.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Wayette Agricultural Society P.O. Box 219 Washington C.H., 43160	Room Rental Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/18/80	\$40.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Tom Mark 211 East Market St. Washington C.H. Ohio 43160	Postage reimbursement Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/18/80	\$17.25
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Shell Oil Company Tulsa, Okla.	Gasoline Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/14/80 5/9/80	\$200.00 150.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Jolly Pirate Donuts 1230 Columbus Ave. Washington C.H., Ohio 43160	Food for Fundraiser Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/18/80	\$16.90
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bulah Wagner Box 544 Washington C.H., Ohio 43160	Catering Service Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/18/80	\$60.00
SUBTOTAL of Disbursements This Page (optional)			\$2,193.34
TOTAL This Period (last page this line number only)			6,090.59

Disbursements Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
The Weekly 304 S. High Waverly, Ohio	Advertising Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/80	\$75.00
B. J. Boebinger Agency, Inc. 2618 Fulton Drive, N.W. Canton, Ohio 45150	Rent Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/9/80	\$303.00
Nail House 41 S. High Street Columbus, Ohio 43215	Food & Service for Fundraiser Event Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/9/80	\$136.95
Sohio Oil Company Cleveland, Ohio	Gasoline Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/9/80	\$300.00
Steven Carpenter 119 Sherwood Drive Hillsboro, Ohio 45133	Reimbursement for Expenses Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/9/80	\$368.75
Hamilton Township (Warren County, Ohio)	Sign Deposit Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/10/80	\$25.00
Batavia Twp. Hall Judd Rd. & Amelia Olive Branch Batavia, Ohio 45103	Sign Deposit Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/25/80	\$ 100.00
Gary Curran 323 N. High St. Hillsboro, Ohio 45133	Reimbursement for Expenses Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		\$94.11
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			\$ 1,402.82
TOTAL This Period (last page only)			14,907.21

00040203139

1973

0681 M 02850

33 9103043240 33

LIZ B. HCEVEN

74413931

033680

HILLSBORO OH

PRODUCT	QTY	PRICE	AMOUNT

Union
897780

NOTICE TO BUYER: (1) Do not sign this charge agreement unless you read it (both sides) or it contains any blank spaces. (2) You are entitled to a complete bill in copy of this agreement. Keep it to protect your legal rights. (3) You have the right to pay in advance the full amount due. I have read the notice, agree to the terms and conditions on the reverse side, and acknowledge receipt of a copy.

SALES TAX

TOTAL

OTHER REQUIRED IDENTIFICATION

0681 M 03242

33 9803205377 33

LIZ B. HCEVEN

74413931

033180

HILLSBORO OH

PRODUCT	QTY	PRICE	AMOUNT

Union
097425

NOTICE TO BUYER: (1) Do not sign this charge agreement unless you read it (both sides) or it contains any blank spaces. (2) You are entitled to a complete bill in copy of this agreement. Keep it to protect your legal rights. (3) You have the right to pay in advance the full amount due. I have read the notice, agree to the terms and conditions on the reverse side, and acknowledge receipt of a copy.

SALES TAX

TOTAL

OTHER REQUIRED IDENTIFICATION

D-1

377 77678 3

74413931 041180

QTY.	PRICE	AMOUNT

UNION
497638

ACCOUNTING COPY

5/1/52

00040003140

0681 M 02200

35 1207147108 35

LIZ B. REEVEN 1975

WARTON 76
74413931
HILLSBORO OH

DATE 082140

QTY.	PRICE	AMOUNT
		2.00

UNION
497677

ACCOUNTING COPY

FORM 2-62 (2-7-57) PRINTED IN U.S.A.

NOTICE TO BUYER: (1) Do not sign this check agreement before you read it both sides or it contains any blank spaces. (2) You are entitled to a complete bill in copy of this agreement. Keep it to protect your legal rights. (3) You have the right to pay in advance the full amount due. I have read this notice, agree to the terms and conditions on the reverse side, and acknowledge receipt of a copy.

80040203141

NOV 27 1986		02700	
1345811245		03280	
EDGAR J HILLARD		00196	
5072 HARRISBURG		ORIENT ON	
574-2702-0138		27 00	
5640		CA	
27 00		STATE	

NOV 27 1986

02700

1345811245

03280

00196

EDGAR J HILLARD

5072 HARRISBURG

ORIENT ON

574-2702-0138

27 00

5640

CA

27 00

STATE

INVOLVING BUDGET PLAN AGREEMENT

BY SIGNING THIS AGREEMENT YOU AGREE TO THE TERMS AND CONDITIONS OF THE AGREEMENT AND TO PAY THE FULL AMOUNT OF THE AGREEMENT AT THE TIME YOU SIGN IT. YOU MAY AT ANY TIME PAY OFF THE FULL AMOUNT OF THE AGREEMENT.

NOV 27 1986

01600

1345811245

05050

01516

EDGAR J HILLARD

5072 HARRISBURG

ORIENT ON

574-2702-0138

27 00

5640

CA

27 00

STATE

INVOLVING BUDGET PLAN AGREEMENT

BY SIGNING THIS AGREEMENT YOU AGREE TO THE TERMS AND CONDITIONS OF THE AGREEMENT AND TO PAY THE FULL AMOUNT OF THE AGREEMENT AT THE TIME YOU SIGN IT. YOU MAY AT ANY TIME PAY OFF THE FULL AMOUNT OF THE AGREEMENT.

000403143

THE HOLDER IN DUE COURSE RULE COVERS THIS PURCHASE

03550
H 555102380098

LIZ B MC EWEY 02 82

4 4 80 9752169

0662	ROAN	COYON	TETON	36	9	23	30	50
0	NETER	CH						

[Signature]

38.00

THE HOLDER IN DUE COURSE RULE COVERS THIS PURCHASE

03800
H 0325C1880121

LIZ B MC EWEY 02 82

4 26 80 1752833

0662	ROAN	COYON	TETON	36	9	23	30	50
0	NETER	CH						

[Signature]

38.00

THE HOLDER IN DUE COURSE RULE COVERS THIS PURCHASE

Receipts

From

Total Receipts for

Payments

5/8/50

5/24/50

\$ 1,200.00

\$ 1,200.00

Page twelve includes receipts for gasoline expenses incurred by the Van (\$98.00).

80040203149

60040203146

01520
H 3715C1880025
02 82

012180 0903763

48776	STANDARD OIL CO	STANDARD OIL CO	STANDARD OIL CO	15 6 09 100

[Handwritten signature]

02283
H 1787C1880025
02 82

012361 1650984

48576	STANDARD OIL CO	STANDARD OIL CO	STANDARD OIL CO	15 6 09 100

[Handwritten signature]

80040203147

CHASE
 5023776
 02 02
 4557HC
 Ohio
 S.H. X Rob McEwen

PERSON	LOCATION	CLASS	DATE	TIME	PRICE

DEFERRED COURSE RULE COVERS THIS PURCHASE

CHASE
 01000
 54200380038
 02 02
 LIZ B MC EWE
 3167532
 08 11
 4557HC
 Ohio
 S.H. X Rob McEwen

PERSON	LOCATION	CLASS	DATE	TIME	PRICE

DEFERRED COURSE RULE COVERS THIS PURCHASE

595

175

COVERS THIS PURCHASE

02484

H 5276C 1650070

LIZ B RC EVER

02 82



090680 9170433

QTY	PRICE	AMOUNT
1	91.50	91.50
<p><i>[Handwritten signature]</i></p>		
		TOT 91.50

THE "HOLDER-IN-DUE-COURSE" RULE COVERS THIS PURCHASE.

02200

H 5276C 1650070

LIZ B RC EVER

02 82



3 7 80 5753102

QTY	PRICE	AMOUNT
3	12.50	37.50
<p><i>[Handwritten signature]</i></p>		
		TOT 37.50

THE "HOLDER-IN-DUE-COURSE" RULE COVERS THIS PURCHASE.

80040303151

00010
 001001780100
 0257867
 4 3 80

455/12	04/10	02/10/1980
ACTION OPTION		
FIBER		
CVD		

[Signature]

THE "IN-TOUR" COURSE RULE COVERS THIS PURCHASE.

02150
 034480880102
 02 82
 02 80

L12 B MC EVER

4 8 80

455/12	04/10	02/10/1980
ACTION OPTION		
FIBER		
CVD		

[Signature]

THE "IN-TOUR" COURSE RULE COVERS THIS PURCHASE.

00040203182

02100
 H 2184C 1385 107
 LIZ B WC ENEY 02 82

0618324

4857	IRON	IRON	IRON	18 17	7.00
017					
N6					

041580 0287535

ORDER IN THE COURSE RULE COVERS THIS PURCHASE.

01100
 H 2184C 1385 107
 LIZ B WC ENEY 02 82

041580 0287535

4857	IRON	IRON	IRON	18 17	7.00
017					
N6					

ORDER IN THE COURSE RULE COVERS THIS PURCHASE.

0004003154

THE IN-COURSE RULE COVERS THIS PURCHASE.

02000

N 2427C1880117

L12 8 * 1951

02 82



\$ 22.80 2462828

4787HC	DATE	AMOUNT	REMARKS	INITIALS
OH				
RP				
				26.00

THE IN-COURSE RULE COVERS THIS PURCHASE.

01900

N 6748C1680117

L12 8 * 1951

02 82



DATE OF DISCOUNT

1 23 1

5861525

4787HC	DATE	AMOUNT	REMARKS	INITIALS
OH				
RA				
				X
				R.M.

THE IN-COURSE RULE COVERS THIS PURCHASE.

LIZ B HC EVEN

STANDARD OIL CO
303 E COURT ST
WASHINGTON DC 20001

042580 028829

1762	BORON	CEIRON	CEIRON			
04	NITREX	QVO				

[Handwritten signature]

"THE HOLDER IN DUE COURSE" RULE COVERS THIS PURCHASE.

80048203155

02784

H 5550C1388129

LIZ B HC EVEN

02 82



STANDARD OIL CO
303 E COURT ST
WASHINGTON DC 20001

5 1 80 0310074

1762	BORON	CEIRON	CEIRON			
04	NITREX	QVO				

[Handwritten signature]

"THE HOLDER IN DUE COURSE" RULE COVERS THIS PURCHASE.

THE "HOLD-OR-DUE-COURSE" RULE COVERS THIS PURCHASE.

03350

H 665102380098

U12 B RC 0001

02 82

STANDARD ON...
BILLING ONLY AND

4 4 00

9752169

77667	FROM	TO	DATE	AMOUNT
0				
<i>[Signature]</i>				380

THE "HOLD-OR-DUE-COURSE" RULE COVERS THIS PURCHASE.

03800

H 0325C1880121

U12 B RC 0001

02 82

STANDARD ON...
BILLING ONLY AND

4 26 00

1752833

	FROM	TO	DATE	AMOUNT
<i>[Signature]</i>				3800

THE "HOLD-OR-DUE-COURSE" RULE COVERS THIS PURCHASE.

E-25

30040203159

0681M 01000

34 8503070417 34

LIZ B HEEVEN 1979

60005 76
76034982

031780

DATE	QTY	PRICE	AMOUNT
11/24/79	1	10.00	10.00

UNION
490306

ACCOUNTING COPY

10.00

NOTICE TO BUYER: (1) Do not sign this charge agreement before you read it (both sides) or if it contains any blank spaces. (2) You are entitled to a completely filled in copy of this agreement. Keep it to protect your legal rights. (3) You have the right to pay in advance the full amount due. I have read this notice, agree to the terms and conditions on the reverse side, and acknowledge receipt of a copy.

SIGNATURE OF BUYER
LIZ B HEEVEN

UN LICENSE NO. STATE USE NO.
CO. IF NOT UNION AUTHORIZATION NO.

OTHER REQUIRED IDENTIFICATION

0681M 02400

28 1207145813 28

LIZ B HEEVEN 1979

6-A210-5 76
74413931

040580

DATE	QTY	PRICE	AMOUNT
11/24/79	1	24.00	24.00

UNION
097241

ACCOUNTING COPY

24.00

NOTICE TO BUYER: (1) Do not sign this charge agreement before you read it (both sides) or if it contains any blank spaces. (2) You are entitled to a completely filled in copy of this agreement. Keep it to protect your legal rights. (3) You have the right to pay in advance the full amount due. I have read this notice, agree to the terms and conditions on the reverse side, and acknowledge receipt of a copy.

SIGNATURE OF BUYER
LIZ B HEEVEN

UN LICENSE NO. STATE USE NO.
CO. IF NOT UNION AUTHORIZATION NO.

OTHER REQUIRED IDENTIFICATION

80040203160

097659

0681 N 03200

02 H009334214 52

LIZ B ROEMER

1975

WARTONS 76

74413931

050980

HILLSBORO OH

PRODUCT

QTY	PRICE	AMOUNT
1	200	200
SALES TAX		
TOTAL		
200		

UNION

196464

STATE OF OHIO
 DEPARTMENT OF REVENUE
 NOTICE: (1) This receipt is valid only if it is properly filled out and filed with the proper authorities. (2) This receipt is not valid if it is altered or tampered with. (3) This receipt is not valid if it is not filed with the proper authorities. (4) This receipt is not valid if it is not filed with the proper authorities. (5) This receipt is not valid if it is not filed with the proper authorities. (6) This receipt is not valid if it is not filed with the proper authorities. (7) This receipt is not valid if it is not filed with the proper authorities. (8) This receipt is not valid if it is not filed with the proper authorities. (9) This receipt is not valid if it is not filed with the proper authorities. (10) This receipt is not valid if it is not filed with the proper authorities.

NEW LICENSE	DUPLICATE	SALES TAX
REGISTRATION	SALES TAX	SALES TAX
SALES TAX	SALES TAX	SALES TAX

00040203161

0681 M 02850
33 9103043240 33

112 S. SCOTT ST
HILLSBORO OH 44131
DATE 1975
74413931 033680

NOTICE TO BUYER: (1) Do not sign this charge agreement unless you read it (both sides) or if it contains any blank spaces. (2) You are entitled to a completely filled in copy of this agreement. Keep it to protect your legal rights. (3) You have the right to pay in advance the full amount due. I have read the notice, agree to the terms and conditions on the reverse side, and acknowledge receipt of a copy.

QTY	PRICE	AMOUNT
SIGNATURE OF BUYER		
VIA LICENSE NO		
STATE		
CITY		
S. CO. IF NOT UNION		
AUTHORIZATION NO		
OTHER REQUIRED IDENTIFICATION		

Union
897780

0681 M 03242
33 9803203277 33

LIZ B. ROEVEN
DATE 1975
74413931 033180
HILLSBORO OH

NOTICE TO BUYER: (1) Do not sign this charge agreement unless you read it (both sides) or if it contains any blank spaces. (2) You are entitled to a completely filled in copy of this agreement. Keep it to protect your legal rights. (3) You have the right to pay in advance the full amount due. I have read the notice, agree to the terms and conditions on the reverse side, and acknowledge receipt of a copy.

QTY	PRICE	AMOUNT
SIGNATURE OF BUYER		
VIA LICENSE NO		
STATE		
CITY		
S. CO. IF NOT UNION		
AUTHORIZATION NO		
OTHER REQUIRED IDENTIFICATION		

Union
097425

Total Receipts for [illegible] [illegible]

EXPENSES

4/14/60
5/9/60

[illegible]
[illegible]

Balance owed by Committee

[illegible]

Page six includes all receipts for gasoline expenses reported by the committee.

* This amount includes \$120.00 requested by the Candidate, Inc. for which the receipts have been lost. The Candidate has requested duplicate copies of these bills from the Shell Oil Company.

60040203163

00040203165

02000

054710422 ESTI

BARBERA BROWN
 165 E BROAD
 COLUMBUS OH 43205

DATE	20 00	AMOUNT	20 00
DESCRIPTION			
TAXES			
FEES			
OTHER			
TOTAL	20 00		

ISSUED BY: *[Signature]*
 COMPANY: *[Signature]*

808 RECEIVED



MM080 03183

0540911794 2530

BROAD CLEVELAND IN
 404 E BROAD
 COLUMBUS OH 43220

254 1200 1725

DATE	3 17	AMOUNT	3 12 50
DESCRIPTION			
TAXES			
FEES			
OTHER			
TOTAL	3 12 50		

ISSUED BY: *[Signature]*
 COMPANY: *[Signature]*

E-3

80040303167

NAME	BARRETT, JOHN
ADDRESS	153 E 2ND ST MILWAUKEE, WI 53201
CITY	MILWAUKEE
STATE	WI
ZIP	53201

800 RECEIPT

01600

11200079 5764

BARRETT, JOHN
153 E 2ND ST
MILWAUKEE, WI 53201

VEHICLE TAG NO	STATE	SALES TAX	REGISTRATION	TITLE	TOTAL
5-6742	WI	27.00			27.00

THIS COPE CANNOT BE USED FOR TAX REFUND PURPOSES.

800 RECEIPT

01600

1345511245 5471

EDGAR J HILLAND
5972 HARRISBURG
ORIENT ON
234-5702-0122

VEHICLE TAG NO	STATE	SALES TAX	REGISTRATION	TITLE	TOTAL
21112	WI	17.00			17.00

THIS COPE CANNOT BE USED FOR TAX REFUND PURPOSES.

E-5

30040203109



- EXECUTIVE OFFICES:**
 4920 Hills and Dales, N.W.
 CANTON, OHIO 44708
 216-478-0051
- BRANCH OFFICES:**
 1900 West Market St.
 AKRON, OHIO 44320
 216-867-8220
- 760 West State Street
 ALLIANCE, OHIO 44021
 216-823-3430
- 308 E. Cherry Street
 CANAL FULTON, OHIO 44614
 216-854-2231
- 2618 Fulton Dr., N. W.
 CANTON, OHIO 44714
 216-455-0345
- 750 Graham Road
 CUYAHOGA FALLS, OHIO 44221
 216-829-0503
- 1111 Northview Drive
 HILLSBORO, OHIO 45133
 513-393-2651
- 921 Lincolnway, East
 MASSILLON, OHIO 44848
 216-837-8377
- 3803 Wales Rd. N.W.
 JACKSON TWP., OHIO 44646
 216-833-1001
- 800 N. Main Street
 NORTH CANTON, OHIO 44720
 216-494-7800
- 2825 Edison St., N.W.
 UNIONTOWN, OHIO 44685
 216-699-9957

Address	Miles	Days
4920 Hills and Dales, N.W.	125	2-1-80
1900 West Market St.	80	2-1-80
760 West State Street	90	2-1-80
308 E. Cherry Street	75	2-1-80
2618 Fulton Dr., N. W.	125	2-1-80
750 Graham Road	160	2-1-80
1111 Northview Drive	224	2-1-80
921 Lincolnway, East	50	3-5-80
3803 Wales Rd. N.W.	80	3-12-80
800 N. Main Street	75	3-19-80
2825 Edison St., N.W.	105	3-27-80
4920 Hills and Dales, N.W.	125	4-1-80
1900 West Market St.	80	4-18-80
760 West State Street	90	4-25-80
308 E. Cherry Street	75	5-1-80
2618 Fulton Dr., N. W.	125	5-3-80
750 Graham Road	160	5-7-80
1111 Northview Drive	224	5-29-80
921 Lincolnway, East	50	5-31-80
3803 Wales Rd. N.W.	80	6-2-80
800 N. Main Street	75	6-6-80
2825 Edison St., N.W.	105	

Total Miles: 1,691 ----- \$169.10

Total Days: 16 ----- 800.00

TOTAL: \$969.10

COMMERCIAL-INVESTMENT:
 4920 Hills and Dales, N.W.
 CANTON, OHIO 44708
 216-478-0051

PROPERTY MANAGEMENT:
 4920 Hills and Dales, N.W.
 CANTON, OHIO 44708
 216-478-0071

BOHLENDER

Engraving Band

MADE IN GERMANY

80040203170

BONLENDER

Engraving Bond

MADE IN U.S.A.

00040203172

Cincinnati, Ohio, 45210

- April 15 Quarterly Report (Required)
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-electoral Year Only)

- Treasurer Report

This report contains activity for -- Primary Election General Election Special Election Recall Election

0040203173

SUMMARY		Column A Total Period	Column B Subsequent Periods
6. Covering Period	1/1/80 Through 3/31/80		
6. Net Contributions (other than loans):			
(a) Total Contributions (other than loans) (from Line 11a)		\$ 11,960.00	\$ 11,960.00
(b) Total Contribution Refunds (from Line 20d)		\$ 0	\$ 0
(c) Net Contributions (other than loans) (Subtract Line 6b from 6a)		\$ 0	\$ 0
7. Net Operating Expenditures:			
(a) Total Operating Expenditures (from Line 17)		\$ 10,800.54	\$ 10,800.54
(b) Total Offsets to Operating Expenditures (from Line 14)		\$ 0	\$ 0
(c) Net Operating Expenditures (Subtract Line 7b from 7a)		\$ 10,800.54	\$ 10,800.54
8. Cash on Hand at Close of Reporting Period (from Line 27)		\$ 1,159.46	\$ 1,159.46
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)		\$ 0	\$ 0
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$ 916.52	\$ 916.52

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-522-4000

K. A. Payton, Treasurer

Type or Print Name of Treasurer

K. A. Payton
SIGNATURE OF TREASURER

6-30-80
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.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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FEC FORM 3 (3/80)

00040203174

	1-1-80	1-1-
II. RECEIPTS		
11. CONTRIBUTIONS (Add 11a, 11b, 11c and 11d)		
a) Individuals/Persons Other Than Political Committees	\$9,820.00	9,820.00
Name: _____		
b) Political Party Committees	-0-	-0-
c) Other Political Committees	\$2,140.00	2,140.00
d) The Candidate	-0-	-0-
e) TOTAL CONTRIBUTIONS (Add 11a, 11b, 11c and 11d)	11,960.00	11,960.00
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	-0-	-0-
13. LOANS:		
a) Made or Guaranteed by the Candidate		
b) All Other Loans		
c) TOTAL LOANS (Add 13a and 13b)	-0-	-0-
14. OFFSETS TO OPERATING EXPENDITURES (Donations, Refunds, etc.)	-0-	-0-
15. OTHER RECEIPTS (Donations, Interest, etc.)	-0-	-0-
16. TOTAL RECEIPTS (Add 11a, 12, 13c, 14 and 15)	11,960.00	11,960.00
II. DISBURSEMENTS		
17. OPERATING EXPENDITURES	\$10,800.54	\$10,800.54
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES		
19. LOAN REPAYMENTS:		
a) Of Loans Made or Guaranteed by the Candidate		
b) Of All Other Loans		
c) TOTAL LOAN REPAYMENTS (Add 19a and 19b)	-0-	-0-
20. REFUNDS OF CONTRIBUTIONS TO:		
a) Individuals/Persons Other Than Political Committees		
b) Political Party Committees		
c) Other Political Committees		
d) TOTAL CONTRIBUTION REFUNDS (Add 20a, 20b and 20c)		
21. OTHER DISBURSEMENTS	-0-	-0-
22. TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21)	\$10,800.54	\$10,800.54
III. CASH SUMMARY		
23. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD		-0-
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)		11,960.00
25. SUBTOTAL (Add Line 23 and Line 24)		11,960.00
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)		10,800.54
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)		1,159.46

60040203175

Name of Debtor (Person):			
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor			
Name of Debt (Purpose):			
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor			
Name of Debt (Purpose):			
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor			
Name of Debt (Purpose):			
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor			
Name of Debt (Purpose):			
1) SUBTOTALS This Period This Page (optional)			916.00
2) TOTAL This Period (see page 20b line only)			916.00
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)			
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)			916.00

- April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)

This report contains activity for — Primary Election General Election Special Election Other

80049303176

SUMMARY		Column 1 Total Fund	Column 2 Total
6. Covering Period <u>4/1/80</u> Through <u>5/14/80</u>			
6. Net Contributions (other than loans):			
(a) Total Contributions (other than loans) (from Line 11a)		\$ 17,450.00	\$ 29,410.00
(b) Total Contribution Refunds (from Line 20d)		\$ -0-	\$ -0-
(c) Net Contributions (other than loans) (Subtract Line 6b from 6a)		\$ 17,450.00	\$ 29,410.00
7. Net Operating Expenditures:			
(a) Total Operating Expenditures (from Line 17)		\$ 14,907.21	\$ 25,707.75
(b) Total Offsets to Operating Expenditures (from Line 14)		\$ -0-	\$ -0-
(c) Net Operating Expenditures (Subtract Line 7b from 7a)		\$ 14,907.21	\$ 25,707.75
8. Cash on Hand at Close of Reporting Period (from Line 27)		\$ 3,702.25	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)		\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$ 687.49	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-527-4066

K.A. Payton, Treasurer
Type or Print Name of Treasurer

K.A. Payton
SIGNATURE OF TREASURER

6-30-80
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 5457.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

800403177

		Jan 1-1-88	
		1987	1988
II. RECEIPTS			
11. CONTRIBUTIONS FROM:			
(a) Individuals/Persons Other Than Political Committees	11,250.00	21,070.00	
(b) Political Party Committees	0	0	
(c) Other Political Committees	6,200.00	8,340.00	
(d) The Candidate	-0-	-0-	
(e) TOTAL CONTRIBUTIONS (Add 11a, 11b, 11c and 11d)	17,450.00	29,410.00	
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	0	0	
13. LOANS:			
(a) Made or Guaranteed by the Candidate	0	0	
(b) All Other Loans	0	0	
(c) TOTAL LOANS (Add 13a and 13b)	0	0	
14. OFFSETS TO OPERATING EXPENDITURES (Interest, etc.)			
15. OTHER RECEIPTS (Dividend, Interest, etc.)			
16. TOTAL RECEIPTS (Add 11a, 12, 13a, 14 and 15)			
II. DISBURSEMENTS			
17. OPERATING EXPENDITURES	14,907.21	25,707.75	
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES	0	0	
19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate	0	0	
(b) Of All Other Loans	0	0	
(c) TOTAL LOAN REPAYMENTS (Add 19a and 19b)	0	0	
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			
(b) Political Party Committees			
(c) Other Political Committees			
(d) TOTAL CONTRIBUTION REFUNDS (Add 20a, 20b and 20c)			
21. OTHER DISBURSEMENTS	0	0	
22. TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21)	14,907.21	25,707.75	

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD	\$ 1,159.46
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)	\$ 17,450.00
25. SUBTOTAL (Add Line 23 and Line 24)	\$ 18,609.46
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	\$ 14,907.21
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	\$ 3,702.25

ITEMIZED DISBURSEMENTS

These items may not be used by any person to influence the election of any political candidate to public office.

Committee

00040303178

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Bob Nelson 136 West Hillsboro, Oregon	Purpose of Disbursement Reimbursement for Gas expenses (Union 78) Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Amended	Date (month, day, year) 4/1/80	Amount of Each Disbursement This Period \$200.00
B. Full Name, Mailing Address and ZIP Code Shell Oil Company Tulsa, Oklahoma	Purpose of Disbursement Reimbursement for gas expenses by candidate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Amended	Date (month, day, year) 4/14/80 5/9/80	Amount of Each Disbursement This Period \$200.00 \$150.00
C. Full Name, Mailing Address and ZIP Code Sohio Oil Company Cleveland, Ohio	Purpose of Disbursement Reimbursement for gas expenses by candidate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Amended	Date (month, day, year) 5/9/80	Amount of Each Disbursement This Period \$300.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

60040203179

Name of Debtor:			
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor			
Nature of Debt (Purpose):			
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor			
Nature of Debt (Purpose):			
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor			
Nature of Debt (Purpose):			
G. Full Name, Mailing Address and Zip Code of Debtor or Creditor			
Nature of Debt (Purpose):			
1) SUBTOTALS This Period This Page (optional)			687.49
2) TOTAL This Period (last page only)			687.49
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)			
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)			687.49

FEDERAL
Express

YOUR FEC ACCOUNT NUMBER 452-0406-5

FROM (Your Name)
Gordon M. Strauss

DEPARTMENT/FLOOR NO.

COMPANY
GORDON STRAUSS, WHITE & TORLAS

STREET ADDRESS
1000 General Post Tower

CITY STATE ZIP
Washington DC 20002

PLEASE COMPLETE ALL INFORMATION IN THE 5 BLOCKS OUTLINED IN ORANGE.
SEE REVERSE SIDE FOR COMPLETE PREPARATION INSTRUCTIONS

DATE July 1, 1980

AIRBILL NO. 38551466

TO (Consignee's Name)
Maura White, Esq.

If Hold For Pick Up, Phone No.

COMPANY
General Counsel
Federal Election Commission

DEPARTMENT/FLOOR NO.

STREET ADDRESS
1325 "K" Street, N.W.

CITY STATE ZIP
Washington DC 20045

PURCHASE ORDER NO. OR
CONSIGNEE REFERENCE NO.

FEC USE
FREIGHT CHARGES

NON-NEGOTIABLE AIRBILL SUBJECT TO CONDITIONS
OF CONTRACT SET FORTH ON REVERSE OF SHIPPERS
COPY. UNLESS YOU DECLARE A SHIPPER VALUE, THE
LIABILITY OF FEDEX IS LIMITED TO \$500.

DECLARED VALUE
CHARGE

EMP. NO.

AGT/PRO.

ADVANCE ORIGIN

DATE

AGT/PRO

ADVANCE DESTINATION

CASH RECEIVED

RETURN SHIPMENT
 THIRD PARTY

ADDRESS CORRECTION

OTHER

STREET ADDRESS

TOTAL CHARGES

CITY

STATE

ZIP

RECEIVED BY (Signature)
X

DATE/TIME

DELIVERY INSTRUCTIONS (Check One)

Hold For Pick Up

Other

SPECIAL HANDLING (Check Services Required)

Set

Restricted

Access

SSS

Govt

Other

N/A

N/A

N/A

N/A

N/A

N/A

Pieces

Weight

QTS

1

1

1

Total

Total

NO. 1180 940

BILLING COPY

0 8 1 2 0 6 0 7 0 0

ROBERT W. STAFF
CHARLES W. STAFF
JAMES W. STAFF
THEODORE E. STAFF
DONALD W. STAFF
S. BRUCE STAFF
DAVID F. STAFF
BENJ. F. STAFF
R. GUY STAFF
SEADON W. STAFF
LEWIS W. STAFF

General Counsel
FEDERAL ELECTION COMMISSION
Washington, D. C. 20463

300403181

ATTENTION: Maura White, Esq.

RE: MUR 1243; McEwen for Congress

Dear Ms. White:

This letter is to reconfirm our telephone conversation yesterday, Tuesday, June 17, 1980. The Women for Congress Committee did not receive your letter of June 4, 1980, until June 11, 1980, by virtue of the post office's failure to notify them that the certified mail had been received. The envelope, with the green card attached, sat in the post office box for several days as a consequence of that. The letter was, however, received on June 11, and the 15 day period should, presumably, begin to run from that point.

As I indicated over the telephone, my initial review of the facts and circumstances surrounding the allegations contained in Mr. Christy's complaint indicates that there are probably some reporting errors, but there do not appear to be any substantial violations of the Federal Election Campaign Act, as amended. We would therefore hope to proceed in a stance of conciliation, to the extent that it would appear some reports require amending as well as some explanations needing to be provided.

I had hoped to be able to send you a more thorough report at this time, but since I cannot I will do you the courtesy of indicating the Committee's initial stance with respect to the three main allegations in the complaint:

1. Mr. McEwen's attendance at the National Republican Congressional Committee's Candidate Conference is governed, in our opinion, by the Commission's regulations, at 11 C.F.R. Section 106.3(d), and Advisory Opinion 1975-87. Mr. McEwen paid all expenses for travel and lodging from his own, personal account,

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

John White, Esq.
Case Two
June 18, 1980

and under the rules contained in the aforementioned sections should not be required to report them. Section 106.3(d) requires such travel expenses to be reported only if they are paid from a candidate's campaign accounts. This is the case both in the current and in the pending regulations, which are slightly different from one another. Section 106.3(d) deals only with travel expenses. However, Advisory Opinion 1975-87, which was issued to the National Republican Congressional Committee in response to a request dealing specifically with the type of candidate conference which Mr. McEwen attended, exempts specifically lodging and meals if the same are paid from a candidate's personal funds. The Advisory Opinion states in pertinent part:

"While expenses for the candidate's travel would be exempt, other costs such as meals or hotel accommodations which are incurred in relation to the forum must be characterized as expenditures within the meaning of 2 U.S.C. 431(f) and 18 U.S.C. 591(f) unless they are paid for from a candidate's personal funds."

Advisory Opinion 1975-87, Notice 1976-5, 41 Fed. Reg. 2940 (1-20-76); CCH Federal Election Campaign Financing Guide, Paragraph 5178, page 10,122.

We will be sending documentation to the effect that Mr. McEwen paid all these expenses from his personal funds. Therefore, no reporting of these expenses appears to be required.

It appears to us that the candidate is justified in not reporting these costs, inasmuch as he relied on Advisory Opinion 1975-87, and this reliance is sanctioned by 2 U.S.C. Section 437 f (e) and the Commission's Regulations at 11 C.F.R. Section 112.5. Mr. McEwen was attending a conference in all respects substantially the same as that for which Advisory Opinion 1975-87 was issued. Therefore, we respectfully submit that this allegation should be dismissed.

2. The mobile van to which Mr. Christy refers in his complaint has been leased from the E. J. Boebinger Agency, Inc., for occasional campaign uses. We will be submitting affidavits from the company and from the campaign to indicate that the company has owned the vehicle for over three years and that it permitted the campaign to use the vehicle on 15 days between February 1st and June 1st, 1980. The campaign arranged to lease the vehicle at a fair rental value, and had expected invoices to

... prior to the time that any report was due. ... the Campaign Manager, made an ... prior to the closing of the books for ... quarterly report. ... will be acknowledging ... the fact that Mr. ... request for such an invoice, by affidavit of its Vice-President or Director of Finance.

The reason that the invoice was not forthcoming was that the company was having severe problems with its accountant, who is apparently in jail. While it appears that he did not represent E. J. Boebinger Agency, Inc., his work for that agency was not satisfactory and he had been fired. The company has been in the process of attempting to reorganize its records and reconstruct its bookkeeping process. It is not a small company, and this is a significant problem for them. As a result, it has turned into a problem for the campaign.

The campaign has consistently paid gasoline and oil bills attributable to the van. Receipts for gasoline used in the van for campaign-related travel have been given to the Committee, and the charges for this gasoline has been reimbursed either to the candidate or to the oil company, depending on which card was utilized at the time. Because the E. J. Boebinger Agency, Inc. is a corporation, the Committee has been particularly sensitive to the potential for violating the Federal Election Campaign Act as amended, particularly 2 U.S.C. Sections 441a, and 441b. It has, therefore, made a special effort to insure that these bills were paid.

The Committee feels obliged to indicate, however, that in the course of my investigation of the procedure by which gasoline bills were rendered to the Committee and paid by the Committee, it has become apparent that the reporting procedures utilized are probably less than adequate. As a general rule, what is done is that the candidate or his wife purchases gasoline on a personal credit card, for campaign-related activity, and gives the receipt to the Campaign Committee. When the oil company sends an invoice to the candidate the Committee has been in the habit of making checks payable directly to the candidate (and designated as reimbursement for travel expenses on Schedule B of Form 3) or directly to the oil company (and properly designated). However, this appears to me to be an advance by the candidate, which should be reported on Schedule C as debts owed to the candidate to the extent that the candidate has advanced credit to the Campaign Committee. The Campaign Committee has made, in several

00040703

12, 1960

cases, only partial payment of the bill due or to the company for the gasoline charges attributable to campaign-related activities.

The credit being extended to the Committee is being extended by the candidate, who is utilizing his own good credit with the oil company on behalf of his campaign. We propose not only to report this properly in the future, but also to amend the two reports already sent in, as appropriate.

In brief conclusion as to this allegation, my investigation indicates, and I believe that the evidence will support, the fact that the campaign fully intended to be billed for the use of the vehicle, on the basis of its fair rental value, and that the company was trying but was unable to obtain the information necessary to prepare such a bill, as the consequence of its accountant's incompetence. The Committee was making its best effort to obtain and to report the appropriate information, and is therefore not out of compliance with the Federal Election Campaign Act, pursuant to 2 U.S.C. Section 432(h) (2)(1). The company has yet to render such an invoice, although I have been assured that they are working feverishly to prepare one. When it is rendered it will be paid.

3. Mr. Christy makes note of the fact that the Committee has itemized all of its expenditures, rather than those above \$200. The Committee has submitted two reports containing this error, neither of which has been returned by Reports Examining, and therefore was unaware that it was not supposed to report in this manner. This is a case where this Committee has exhibited an excess of zeal, and all its future reports will be done correctly.

The first and third allegations in Mr. Christy's complaint are either baseless or de minimis. The inadequate reporting of the leasing arrangements between the Committee and the E. J. Boebinger Agency, Inc., which is the substance of Mr. Christy's second allegation, is the result of an unfortunate series of events which occurred within the E. J. Boebinger Agency, Inc. The Committee made sincere efforts to get an invoice for using the vehicle for those 15 days, and is pursuing such an invoice with true diligence at this moment. The Committee has instituted a more formal procedure for insuring that gasoline and oil bills are segregated and paid promptly, and to report those portions of the bills which the candidate is carrying on the Committee's behalf in appropriate manner. I shall be submitting a memorandum containing more details

1000403104

...substantiated what appears in the ...
...with affidavit from Charles Greener, ...
...the Campaign Manager and Mr. ...
...and Director of Finance for ...
...In addition, Mr. Greener's affidavit will ...
...thereof photocopies of receipts and checks ...
...substantiate our position. Finally, we will be submitting ...
...Schedule C's for the two reports previously submitted, to ...
...the fact that the candidate has effectively advanced credit to the ...
...Committee in the form of gasoline and oil charges.

The fifteenth day from the date the Committee received your letter is Friday, June 25, 1980. I expect to have all of the materials to you in advance of that, and, in fact, would hope to be in Washington to discuss them with you even before that time. Please let us know if there is any additional information or any additional types of substantiation which you feel you will need to process this case. In any event, I look forward to meeting with you.

Very truly yours,

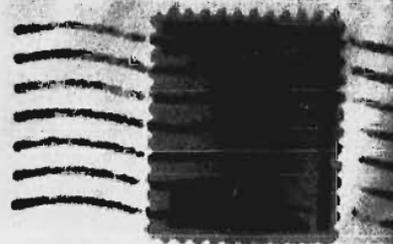
Gordon M. Strauss
GORDON M. STRAUSS

GNS:vmp

CC: McEwen for Congress Committee

00040203100

STEER, STRAUSS, WHITE & TOSIAS
ATTORNEYS AT LAW
2208 CENTRAL TRUST TOWER
CINCINNATI, OHIO 45202



General Counsel
FEDERAL ELECTION COMMISSION
Washington, D. C. 20463

80 JUN 28 PM 12:52

ATTENTION: Maura White, Esq.

RECEIVED

0004020318

June 12, 1969

008025

Federal Election Commission
General Counsel
1323 K. Street N.W.
Washington, D.C. 20463
Re: M.U.R. 1243

Dear Sir:

With respect to the above M.U.R. 1243, a copy of which was received on June 11, I hereby designate Gordon Strauss of Stear, Strauss, White & Tobias to serve as my counsel pursuant to 11 CFR Section 111.23.

Mr. Strauss is authorized to receive any and all communications in accordance therewith.

It is my desire that this matter remain confidential until its final disposition.

Sincerely yours,


Bob McEwen

ON JUN 17 10:41

GENERAL COUNSEL
OFFICE OF THE
FEDERAL ELECTION COMMISSION

"A copy of our report is filed with the Federal Election Commission and is available for inspection at the Federal Election Commission, Washington, D.C."
Issued by Clark Alexander, Campaign Chairman, 141 E. 5th Street, Chillicothe, Ohio 45601

00040203187

McEWEN FOR CONGRESS COMMITTEE

1111 Northview Drive, Room B

Hillsboro, Ohio 45133



Federal Election Commission
General Counsel
1323 K. Street N.W.
Washington, D.C. 20463

JUN 17 AM 8:52

RECEIVED

004003188

CERTIFIED MAIL
RETURN RECEIPT

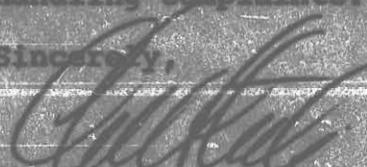
James Christy
5338 South Milford Road
Milford, Ohio 45158

Dear Mr. Christy:

80040303189

This letter is to acknowledge receipt of your complaint of May 27, 1988, against the Bureau for Congress Committee which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondent will be notified of this complaint within 5 days and a recommendation to the Federal Election Commission as to how this matter should be initially handled will be made 15 days after the respondent's notification. You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

PS Form 3811, Aug. 1978

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

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

- Show to whom and date delivered
- Show to whom, date, and address of delivery
- RESTRICTED DELIVERY
Show to whom and date delivered
- RESTRICTED DELIVERY
Show to whom, date, and address of delivery

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: ^{cc}
James Christy

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>945047</i>	

(Always obtain signature of addressee or agent)

I have received the article described above:

SIGNATURE Addressee Authorized agent

J. T. Christy

4. DATE OF DELIVERY
6-9-80

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

1243 White

POSTMARK: JUN 9 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

Commission for Campaign Activities
P.O. Box 1
Hillsboro, Ohio 43131

MUR 1243

Dear Sir or Madam:

This letter is to notify you that on May 30, 1980, the Federal Election Commission received a complaint which alleges that your Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1243. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your Committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

00040203191

Enclosure

1. Complaint
2. Procedures

60040203192

①

11/10/50, 151 45153

②

complaint

↓

James Christy
5338 York Milford Rd
Milford, OH 45150

10/10/00

enc 1

3. The cost of the seminar for the period of February 17, 1980, to February 21, 1980, is approximately \$265.00.

4. The cost of the aforementioned seminar to each participant, to which Affiant also attended, was \$75.00.

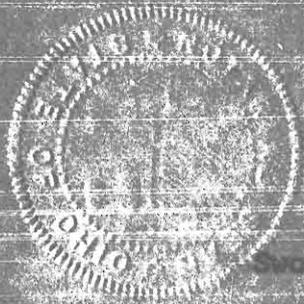
5. The cost of lodging in the Stouffer's National Centre Hotel does not constitute routine living expenses of the Candidate which would have been incurred without candidacy, and as such together with the cost of the aforementioned seminar constitute campaign expenditures under the Federal Election Campaign Act, as amended, and under applicable Federal Election Commission regulations, and are subject to reporting requirements pursuant to said regulations.

6. Elizabeth McEwen, wife of Candidate Robert McEwen, disclosed to Affiant on at least one occasion that a mobile home used by Candidate Robert McEwen for conveying literature, transporting campaign personnel, and displaying signs was leased and not owned by said Candidate.

7. To the best of Affiant's knowledge, Candidate Robert McEwen's

campaign related purposes of less than \$100.00 was made, a highly unlikely possibility.

3. The cost of the above mentioned lodging and restaurant, and the fair rental value of the aforementioned mobile home, are campaign expenditures under the Federal Election Commission Regulations, and since the Report of Receipts and Disbursements of April 15, 1980, does not list these expenditures as campaign expenditures, while purporting to include all such campaign expenditures in such report, said report is erroneous in failing to list such expenditures as campaign expenditures.



James Christy

James Christy
533 South Milford Rd.
Milford, Ohio 45150
(513) 831-7939

Sworn to and subscribed in my presence this 22nd day of May, 1980.

Loren Knause
Loren Knause, Notary Public in
and for the State of Ohio
My commission expires 4/27/85.

Cincinnati-Batavia Pike
Cincinnati, Ohio 45244



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

80040203190

THIS IS THE BEGINNING OF PART 1245

Date Filed 9/9/80 Cassia No. 2

Case Name APE