



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3127

DATE FILMED 7/1/92 CAMERA NO. 4

CAMERA MAN E.E.S.

92040905378

**REPORTS ANALYSIS REFERRAL**

**TO**

**OFFICE OF GENERAL COUNSEL**

**DATE:** 30 March 1990

**ANALYST:** ELIZABETH JONES

**I. COMMITTEE:**

Republican Party of Iowa  
(C00014498)  
Stephen W. Roberts, Treasurer  
521 East Locust  
Des Moines, IA 50309

**II. RELEVANT STATUTE:**

11 CFR §102.5(a)  
2 U.S.C. §441a(f)

**III. BACKGROUND:**

**A. Receipt of Funds from a Non-Federal Account  
11 CFR §102.5(a)**

The 1987 Year End Report filed by the Republican Party of Iowa's Federal Account ("Federal Account") disclosed a \$40,000 debt owed to the Federal Account by its Non-Federal Account ("Non-Federal Account") (Attachment 2). A Request for Additional Information ("RFAI") was sent to the Federal Account on March 16, 1988 advising on an informational basis that "...any transfer from the non-federal to the federal account to repay this debt is prohibited by 11 CFR §102.5(a)(1)(i)" (Attachment 3). Additionally, the RFAI questioned the omission of a Schedule B to support a \$40,000 entry on Line 25 (Loans Made) of the Detailed Summary Page and advised the Federal Account to provide the missing schedule.

A Second Notice was sent to the Federal Account on April 7, 1988 for failure to respond in writing (Attachment 4).

On May 27, 1988, the Reports Analysis Division ("RAD") analyst telephoned the Treasurer, Stephen W. Roberts, and asked Mr. Roberts why the RFAI had not been answered. Mr. Roberts indicated that the Federal Account had changed comptrollers and that the letter had "fallen through the cracks". He further indicated that the new comptroller, Ms.

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Gini Angelici, would call the analyst back on the same day. The analyst also told Mr. Roberts that she wanted to discuss the \$40,000 loan to the Non-Federal Account. Mr. Roberts stated that he did not know much about the transaction, but that they would probably have to transfer-out the money (Attachment 6). Ms. Angelici telephoned the analyst back on May 27, 1988 and stated that she was in the process of preparing an amended report. The analyst told Ms. Angelici that she would soon be receiving an RFAI questioning the \$40,000 loan repayment on the 1988 April Quarterly Report. Ms. Angelici indicated that she would discuss the matter with the Federal Account's legal counsel and that she would try to file a response by June 3, 1988 (Attachment 7).

Ms. Angelici called the RAD analyst on May 31, 1988 and explained that the Federal Account had paid a \$40,000 bank loan received by the Non-Federal Account. She asked how the Non-Federal Account could repay the Federal Account. The analyst explained that there could be no repayment (Attachment 8).

The 1988 April Quarterly Report disclosed a loan repayment from the Non-Federal Account dated March 11, 1988 (Attachment 5).

An RFAI for the 1988 April Quarterly Report was sent to the Federal Account on June 8, 1988 requesting clarification of the receipt of \$40,000 from the Non-Federal Account and advising that such transfer is a violation of 11 CFR §102.5(a)(1)(i). The RFAI advised that the full amount must be returned to the Non-Federal Account (Attachment 9).

Ms. Angelici telephoned the analyst on June 23, 1988 (Attachment 10). She wanted to send a response to the RFAI by FAX machine, but was told that it was not possible. She said the \$40,000 had been transferred to the Non-Federal Account.

A Second Notice was sent to the Federal Account on June 30, 1988 for failure to respond in writing (Attachment 11).

On July 15, 1988, the RAD analyst received a letter from the Federal Account explaining the nature of the transfer (Attachment 12). Attached to said letter was a copy of the check, dated May 31, 1988, transferring the \$40,000 from the Federal Account to the Non-Federal Account. On July 15, 1988 the Federal Account also filed an amended 1987 Year End Report that included a Schedule B itemizing the \$40,000 loan (Attachment 13). The transfer was reported on the Federal Account's 1988 July Quarterly Report (Attachment 14).

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B. Apparent Commingling of Federal and Non-Federal Contributions  
11 CFR §102.5(a)

On September 7, 1988, an RFAI for the 1988 July Quarterly Report was sent to the Federal Account questioning its method of allocating administrative expenses (Attachment 15).

Following a conversation between the RAD analyst and Ralph Brown, the Federal Account's legal counsel, Lisa Stolaruk, Chief of the Unauthorized Branch, telephoned Mr. Brown on September 23, 1988 (Attachments 16-17). Ms. Stolaruk and Mr. Brown discussed the Federal Account's method of allocating operating expenses. Ms. Stolaruk asked him to submit an explanation of the allocation formula and why the Federal Account felt it was reasonable.

A Second Notice was sent to the Federal Account on September 29, 1988 for failure to respond in writing (Attachment 18).

On October 24, 1988, the RAD analyst received a response to the RFAI from Mr. Brown explaining the Federal Account's allocation of administrative expenses (Attachment 19). The RFAI explained that most receipts are deposited into the Federal Account. Expenditures for federal activity are made from that account and the bulk of the remaining funds is transferred to the Non-Federal Account.

The analyst sent an RFAI for the 1988 Amended July Quarterly Report to the Federal Account on December 7, 1988 (Attachment 20). The request cited the RFAI of October 20, 1988 and explained that the practice of initially depositing almost all contributions in the federal account apparently did not comply with the provisions of 11 CFR §102.5(a)(2)(i) through (iii). An Amended July Quarterly Report was received on December 12, 1988 that did not address the RFAI. A Second Notice was sent to the Federal Account on December 30, 1988 for failure to respond in writing (Attachment 21).

On January 23, 1989 the analyst received a letter from the Federal Account (Attachment 22). The response stated that the Federal Account deposits "...only those funds into the federal account which result from a solicitation which expressly states that the contribution will be used in connection with the federal election." The RFAI further stated that all fundraising solicitations of the Federal Account request the contributor's occupation, name of employer, and place of business and expressed the belief that this fulfilled the requirements of 11 CFR §102.5. The

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response failed to clarify whether the contributions were designated for the Federal Account, whether the contributors were informed that the contributions were subject to the prohibitions and limitations of the Act, and whether the contributions resulted from a solicitation which expressly stated that the contributions would be used in connection with a Federal election.

No further information has been received from the Federal Account.

**C. Excessive Contributions from an Individual and Contributions from Unregistered Organizations  
2 U.S.C. §441a(f) and 11 CFR §102.5(a)**

The Federal Account received \$3,475 in excessive contributions from an individual and \$8,600 in contributions from seven (7) unregistered organizations. Additionally, the Party received two (2) contributions from two (2) apparent non-federal accounts of registered committees totalling \$5,500.

On August 26, 1987, the Federal Account filed an amended 1987 Mid-Year Report which disclosed six (6) contributions from unregistered organizations totalling \$2,400 (Attachment 23). The contributions were received between February 9, 1987 and May 1, 1987 and ranged in amount from \$300 to \$500.

On January 13, 1988, an RFAI for the 1987 Amended Mid-Year Report was sent to the Federal Account requesting clarification regarding the source of the contributions. If the contributions were not permissible, the RFAI recommended the total amount be transferred to a non-federal account with the donor's consent and/or refunded to the contributor (Attachment 24). On February 4, 1988 a Second Notice was sent to the Federal Account for failure to respond (Attachment 25).

On March 8, 1988 the Federal Account responded by submitting a photocopy of a check to the Non-Federal Account for \$2,400. The check was dated March 1, 1988. An accompanying letter stated that the check was for the six (6) contributions from unregistered organizations (Attachment 26). The Federal Account disclosed the transfer-out on its 1988 April Quarterly Report (Attachment 5).

The Federal Account's 1987 Year End Report disclosed contributions from an individual which were excessive by \$3,475 (Attachment 2). The contributions were received between September 6, 1987 and September 16, 1987. The report also disclosed \$6,000 in contributions dated July 28, 1987

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and September 15, 1987 from two (2) unregistered organizations.<sup>1/</sup>

An RFAI for the 1987 Year End Report was sent to the Federal Account on March 16, 1988, requesting clarification of the excessive contribution and advising that the excessive amount should be refunded to the donor or transferred to a non-federal account. Additionally, the RFAI requested clarification regarding the source of the contributions from the unregistered organizations. If the contributions were not permissible, the RFAI recommended the total amount be transferred to a non-federal account with the donor's consent and/or refunded to the contributors (Attachment 3). A Second Notice was sent to the Federal Account on April 17, 1988 for failure to respond (Attachment 4).

On May 27, May 31, and June 23, 1988, the analyst had a series of phone conversations with Ms. Angelici and/or Mr. Roberts. The analyst discussed the Federal Account's initial failure to respond, the process for transferring-out the funds from the unregistered organizations, and the possibility of sending a response by FAX machine (Attachments 6, 7, 8, and 10).

The Federal Account responded in writing to the RFAI on July 15, 1988. The excessive contribution from the individual was transferred to the Non-Federal Account on June 8, 1988. One of the contributions from an unregistered organization was transferred to the Non-Federal Account. This \$5,000 transfer occurred on July 13, 1988. The second contribution from an unregistered organization was not addressed (Attachment 13). The Federal Account disclosed the transfers-out of the two contributions on its 1988 July and October Quarterly Reports (Attachments 14 and 27).

In addition, the Federal Account's 1989 Year End Report disclosed the transfer-out of the remaining \$1,000 contribution from an unregistered organization on August 15, 1989 (Attachment 31).

On December 7, 1988 an RFAI for the 1987 Year End Report was sent to the Federal Account requesting clarification of

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1/ Two other contributions from unregistered organizations, totalling \$200, were received on August 17, 1987 and September 16, 1987. The Federal Account indicated on the Schedule A that the contributions were transferred-out on March 4, 1988. Therefore, these contributions were not included in the March 16, 1988 RFAI (Attachments 2 and 5).

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receipts from two (2) apparent non-federal accounts of registered committees totalling \$5,500. The contributions were received on September 8, 1987 and December 7, 1987. The RFAI advised that such contributions are prohibited by 11 CFR §102.5(a)(1)(i) and should be returned or transferred-out to a non-federal account (Attachment 28). A Second Notice was sent to the Federal Account on December 30, 1988 for failure to respond (Attachment 29). To date, the Federal Account has not responded.

On October 18, 1989, the analyst telephoned Ms. Angelici to tell her to respond to the RFAI as soon as possible. Ms. Angelici stated that she had transferred the impermissible funds during 1989, and she would send a response to the RFAI (Attachment 30).

The analyst again called Ms. Angelici on March 19, 1990 to ask if the refunds had been made, as there had been no disclosure of them. She stated that the refunds had been made some time ago, and she would ascertain their dates and call the analyst (Attachment 31).

No further response has been received regarding the receipts from apparent non-federal accounts of registered committees.

**IV. OTHER PENDING MATTERS INITIATED BY RAD:**

None.

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COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
				TYPE OF FILER		
REPUBLICAN PARTY OF IOWA				ID 000014498	PARTY QUALIFIED	
CONNECTED ORGANIZATION: NONE						
	1987 STATEMENT OF ORGANIZATION - AMENDMENT			29JAN87	3	87FEC/459/2139
	MID-YEAR REPORT	244,184	220,269	1JAN87 -30JUN87	32	87FEC/481/0915
	MID-YEAR REPORT - AMENDMENT	295,066	271,893	1JAN87 -30JUN87	39	87FEC/484/2491
	MID-YEAR REPORT - AMENDMENT	299,246	271,893	1JAN87 -30JUN87	41	88FEC/512/2711
	REQUEST FOR ADDITIONAL INFORMATION			1JAN87 -30JUN87	8	88FEC/498/4749
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN87 -30JUN87	9	88FEC/507/3469
	YEAR-END	367,060	387,649	1JUL87 -31DEC87	38	88FEC/512/2753
	YEAR-END - AMENDMENT	367,035	387,649	1JUL87 -31DEC87	7	88FEC/536/2811
	YEAR-END - AMENDMENT	-	-	1JUL87 -31DEC87	1	89FEC/579/3540
	NOTICE OF FAILURE TO FILE			31DEC87	1	88FEC/510/2948
	REQUEST FOR ADDITIONAL INFORMATION			1JUL87 -31DEC87	5	88FEC/513/1057
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL87 -31DEC87	6	88FEC/516/0850
	REQUEST FOR ADDITIONAL INFORMATION			1JUL87 -31DEC87	3	88FEC/568/2696
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL87 -31DEC87	4	89FEC/575/4866
	1988 APRIL QUARTERLY	200,462	115,157	1JAN88 -31MAR88	26	88FEC/519/0348
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN88 -31MAR88	2	88FEC/536/2908
	REQUEST FOR ADDITIONAL INFORMATION			1JAN88 -31MAR88	2	88FEC/528/4749
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN88 -31MAR88	4	88FEC/532/1173
	JULY QUARTERLY	194,807	224,262	1APR88 -30JUN88	29	88FEC/536/2819
	JULY QUARTERLY - AMENDMENT	-	-	1APR88 -30JUN88	6	88FEC/560/2475
	JULY QUARTERLY - AMENDMENT	198,258	227,713	1APR88 -30JUN88	6	88FEC/574/2799
	JULY QUARTERLY - AMENDMENT	-	-	1APR88 -30JUN88	4	89FEC/578/5321
	REQUEST FOR ADDITIONAL INFORMATION			1APR88 -30JUN88	5	88FEC/545/1921
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR88 -30JUN88	6	88FEC/549/1682
	REQUEST FOR ADDITIONAL INFORMATION			1APR88 -30JUN88	2	88FEC/568/2693
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR88 -30JUN88	2	89FEC/575/4863
	OCTOBER QUARTERLY	453,270	496,589	1JUL88 -30SEP88	40	88FEC/554/2326
	OCTOBER QUARTERLY - AMENDMENT	453,270	496,589	1JUL88 -30SEP88	42	88FEC/556/0577
	OCTOBER QUARTERLY - AMENDMENT	453,270	496,589	1JUL88 -30SEP88	3	88FEC/574/2796
	PRE-GENERAL	148,632	103,618	1OCT88 -19OCT88	24	88FEC/562/5473
	PRE-GENERAL - AMENDMENT	148,623	103,618	1OCT88 -19OCT88	4	88FEC/574/2792
	POST-GENERAL	201,814	243,599	20OCT88 -28NOV88	35	88FEC/574/2757
	YEAR-END	58,263	79,629	29NOV88 -31DEC88	17	89FEC/584/5223
	REQUEST FOR ADDITIONAL INFORMATION			29NOV88 -31DEC88	1	89FEC/589/3983
	REQUEST FOR ADDITIONAL INFORMATION 2ND			29NOV88 -31DEC88	2	89FEC/591/0519
	REQUEST FOR ADDITIONAL INFORMATION			29NOV88 -31DEC88	1	89FEC/591/5170
	REQUEST FOR ADDITIONAL INFORMATION 2ND			29NOV88 -31DEC88	2	89FEC/594/4153
	TOTAL	1,926,971	0 1,925,847			462 TOTAL PAGES

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All reports have been reviewed.  
 Ending Cash-on-hand as of 12-31-88: \$2,242.  
 Debts and Obligations Owed to the Committee as of 12-31-88: \$7,723.  
 Debts and Obligations Owed by the Committee as of 12-31-88: \$0.00

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF MICROFILM	
					PAGES	LOCATION
				TYPE OF FILER		
REPUBLICAN PARTY OF IOWA						
CONNECTED ORGANIZATION:	IOWA REPUBLICAN PARTY					ID #C00014498 PARTY QUALIFIED
	1989 MID-YEAR REPORT	409,980	399,111	1JAN89 -30JUN89	51	89FEC/606/0687
	YEAR-END	494,149	480,920	1JUL89 -31DEC89	38	90FEC/627/4710
	YEAR-END - AMENDMENT	494,149	480,920	1JUL89 -31DEC89	38	90FEC/628/0475
	REQUEST FOR ADDITIONAL INFORMATION			1JUL89 -31DEC89	1	90FEC/629/5029
	REQUEST FOR ADDITIONAL INFORMATION			1JUL89 -31DEC89	1	90FEC/629/5030
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL89 -31DEC89	2	90FEC/631/4240
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL89 -31DEC89	2	90FEC/631/4242
	TOTAL	904,129	0 880,031			133 TOTAL PAGES

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All reports have been reviewed.  
 Ending Cash-on-hand as of 12-31-89. 27,340.26  
 Debts and Obligations Owed to the Committee as of 12-31-89. \$7,723.00  
 Debts and Obligations Owed by the Committee as of 12-31-89. \$36,000.00

# REPORT OF RECEIPTS AND DISBURSEMENTS AND DELIVERED

For Other Than An Authorized Committee  
(Summary Page)

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

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Page 1 of 7

USE PRE-PAID LABELS OR PRINT

1. NAME OF COMMITTEE (in full)  
 Republican Party of Iowa  
 ADDRESS (number and street)  Check if different than previously reported  
 1540 High Street  
 CITY, STATE and ZIP CODE  
 Des Moines, Iowa 50309

2. FEC IDENTIFICATION NUMBER  
 CU0016498  
 3.  This committee qualified as a noncandidate committee DURING THIS Reporting Period on \_\_\_\_\_ (date)

### 4. TYPE OF REPORT

- (a)  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)  
 Termination Report
- Monthly Report Due On  
 February 20  June 20  October 20  
 March 20  July 20  November 20  
 April 20  August 20  December 20  
 May 20  September 20  January 31
- Twelfth day report preceding \_\_\_\_\_ (Date of Election) election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Thirtieth day report following the General Election on \_\_\_\_\_ in the State of \_\_\_\_\_

(b) Is this Report an Amendment?  YES  NO

### SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
7-1-87 through 12-31-87		
6. (a) Cash on Hand January 1, 1987		\$ 1,095.29
(b) Cash on Hand at Beginning of Reporting Period	\$ 28,449.14	
(c) Total Receipts (from Line 1c)	\$ 367,060.05	\$ 666,306.93
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 395,509.19	\$ 667,402.22
7. Total Disbursements (from Line 2b)	\$ 387,649.74	\$ 659,542.77
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 7,859.45	\$ 7,859.45
9. Debts and Obligations Owed TO the Committee (Items a-f on Schedule C and/or Schedule D)	\$ 51,787.00	
10. Debts and Obligations Owed BY the Committee (Items a-f on Schedule C and/or Schedule D)	\$ -0-	

For further information contact:  
 Federal Election Commission  
 800 E Street, NW  
 Washington, DC 20543  
 Toll Free 800-426-9530  
 Local 202 376-3120

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

Type or Print Name of Treasurer  
Stephen A. Roberts

Signature of Treasurer  
*Stephen A. Roberts*

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 5327.

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# DETAILED SUMMARY PAGE

of Receipts and Disbursements  
(Page 2, FEC FORM 278)

Name of Committee (in full) Republican Party of Iowa	Report Covering the Period From: 7-1-87	To: 12-31-87
<b>I. RECEIPTS</b>		
<b>11. CONTRIBUTIONS (other than loans) FROM:</b>	<b>COLUMN A</b> Total This Period	<b>COLUMN B</b> Calendar Year-To-Date
(a) Individuals/Persons Other Than Political Committees		
(1) Itemized (see Schedule A)	\$ 87,681.87	\$ 144,894.11
(2) Unitemized	200,080.85	383,853.41
(3) Total of contributions from individuals	287,762.72	528,747.54
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)	20,350.00	23,600.00
(d) TOTAL CONTRIBUTIONS (add 11(a)(1), (a)(2), and (c))	308,112.72	552,347.54
<b>12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES</b>		
<b>13. ALL LOANS RECEIVED</b>		
<b>14. LOAN REPAYMENTS RECEIVED</b>		
<b>15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)</b>	1,721.00	2,051.00
<b>16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>		
<b>17. OTHER RECEIPTS (Dividends, Interest, etc.)</b>	57,226.33	111,538.39
<b>18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)</b>	367,060.05	666,306.93
<b>II. DISBURSEMENTS</b>		
<b>19. OPERATING EXPENDITURES</b>	138,899.74	248,385.30
<b>20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES</b>	158,500.00	320,907.43
<b>21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>		
<b>22. INDEPENDENT EXPENDITURES (see Schedule E)</b>		
<b>23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (see Schedule F)</b>		
<b>24. LOAN REPAYMENTS MADE</b>	50,000.00	50,000.00
<b>25. LOANS MADE</b>	40,000.00	40,000.00
<b>26. REFUNDS OF CONTRIBUTIONS TO:</b>		
(a) Individuals/Persons Other Than Political Committees	250.00	250.00
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	250.00	250.00
<b>27. OTHER DISBURSEMENTS</b>		
<b>28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)</b>	387,649.74	659,542.73
<b>III. NET CONTRIBUTIONS/OPERATING EXPENDITURES</b>		
<b>29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))</b>	308,112.72	552,347.54
<b>30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))</b>	250.00	250.00
<b>31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)</b>	307,862.72	552,097.54
<b>32. TOTAL OPERATING EXPENDITURES (from Line 19)</b>	138,899.74	248,385.30
<b>33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)</b>	1,721.00	2,051.00
<b>34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)</b>	137,178.74	246,334.30

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ANY INFORMATION COPIED FROM SUCH REPORTS OR STATEMENTS MAY NOT BE SOLD OR USED BY ANY PERSON FOR THE PURPOSE OF SOLICITING CONTRIBUTIONS OF FOR COMMERCIAL PURPOSES, OTHER THAN USING THE NAME AND ADDRESS OF ANY POLITICAL COMMITTEE TO SOLICIT CONTRIBUTIONS FROM SUCH COMMITTEE.

REPUBLICAN STATE CENTRAL COMMITTEE OF IOWA

NAME, ADDRESS AND ZIP CODE	EMPLOYER	DATE	AMT EA RCP
GRAVES, BRUCE 1108 7TH ST WEST DES MOINES IA 50265 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	SHIFF BROWN WINICK 1108 TWO RMAN CENTE DES MOINES	08-04-87 11-04-87	100.00 100.00
GERARD, RUSSELL S. 330 SOUTH ST, SUITE 125 WATERLOO IA 50701 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	GERARD & JACOBI WATERLOO	09-09-87 11-19-87	50.00 250.00
GLORIA, JOHN 835 RESERVION DR FRANKLIN LAKES NJ 07417 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	TURF-LAWN MOVER 746 HENBRIDGE RD SWANSECK	09-04-87	1,000.00
HARBOR FOR REP COMMITTEE C/O JOHN PAUL	STATE OF IOWA Transferred to State Acct. 3-4-88	08-17-87	25.00
HENDERSON FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	OCCUP REPRESENTATIV AGGREGATE Y-T-D	25.00	
GRAHAM, JOHN G. 910 GRAND AVE DES MOINES IA 50309 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	GRAHAM INVESTMENT C 911 GRAND AVE DES MOINES	07-16-87	300.00
HAYES, STEPHANIE R. 21 RIPARIAN RD	OCCUP CHAIRMAN AGGREGATE Y-T-D	09-15-87	250.00
HIGHLAND PARK FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	OCCUP HOUSEWIFE AGGREGATE Y-T-D	250.00	
HERTZ, CARL F. BOX 500 NEVADA IA 50201 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	HERTZ FARM MGT INC BOX 500 NEVADA	12-14-87	300.00
	OCCUP RETIRED AGGREGATE Y-T-D	300.00	
SUBTOTAL OF RECEIPTS THIS PAGE			2,375.00

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Handwritten initials or mark.

## SCHEDULE A STATED RECEIPTS

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## REPUBLICAN STATE CENTRAL COMMITTEE OF IOWA

NAME, ADDRESS AND ZIP CODE	EMPLOYER	DATE	AMT EA RCPT
RALSTON, MICHAEL D. 128 F ST CEDAR FALLS IA 50613 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	THE WESTERN HOME 420 E 11TH ST CEDAR FALLS OCCUP V/P FOR OPERA AGGREGATE Y-T-D 1,200.00	08-04-87 08-17-87	310.67 25.00
REDFERN, LEROY B. 1035 WEST 12TH STREET CEDAR FALLS IA 50613 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	OCCUP Attorney AGGREGATE Y-T-D 250.00	11-19-87	250.00
SCHERRER, BETTY A. 471 E VALLEY DR PLEASANT VALLEY IA 52767 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	OCCUP AGGREGATE Y-T-D 250.00	10-22-87	250.00
SCHERRER, LLOYD G. 471 VALLEY DR PLEASANT VALLEY IA 52767 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	OCCUP AGGREGATE Y-T-D 250.00	10-22-87	250.00
ROBINSON, KAYE B. 3100 ST JOHN'S RD DES MOINES IA 50312 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	CITY OF DES MOINES DES MOINES OCCUP POLICEMAN AGGREGATE Y-T-D 250.00	11-24-87	250.00
RUAN, JOHN 23 34TH ST DES MOINES IA 50312 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	RUAN COMPANIES 3200 RUAN CENTER DES MOINES OCCUP PRESIDENT AGGREGATE Y-T-D 3,000.00	09-09-87	3,000.00
RODGERS, RANDY PO BOX 987 SHEWANBOAN IA 51601 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	SEWMENT INC 200 N AMERICAN SHEWANBOAN OCCUP VP / GEN MGR AGGREGATE Y-T-D 8,475.00	09-06-87 09-15-87 09-16-87	275.00 200.00 8,000.00
SUBTOTAL OF RECEIPTS THIS PAGE			12,010.67

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## SCHEDULE A ITEMIZED RECEIPTS

PAGE 16 of 21  
LINE NUMBER 11A

ANY INFORMATION COPIED FROM SUCH REPORTS OR STATEMENTS MAY NOT BE SOLD, OR USED BY ANY PERSON FOR THE PURPOSE OF SOLICITING CONTRIBUTIONS OF FOR COMMERCIAL PURPOSES, OTHER THAN USING THE NAME AND ADDRESS OF ANY POLITICAL COMMITTEE TO SOLICIT CONTRIBUTIONS FROM SUCH COMMITTEE.

## REPUBLICAN STATE CENTRAL COMMITTEE OF IOWA

NAME, ADDRESS AND ZIP CODE	EMPLOYER	DATE	AMT EA RCP:
BLIFE, HARRY G. 2306 RAINBOW AVE		12-07-07	250.00
CEDAR FALLS IA 50613 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	OCCUP RETIRED AGGREGATE T-T-D	500.00	
STROMER FOR RE ELECTION RR 3			
	Transferred to State Act. 3-4-08	09-16-07	175.00
GARNER IA 50438 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	OCCUP State Representative's Comm AGGREGATE T-T-D	175.00	
SEN VAAS, DEURT 1000 WATERWAY BLVD	SEN VAAS INC 1000 WATERWAY BLVD INDIANAPOLIS	09-16-07	500.00
INDIANAPOLIS IN 46202 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	OCCUP CHAIRMAN / SE AGGREGATE T-T-D	500.00	
SEVATSON, MERVIN J. PO BOX 363		11-30-07	200.00
MALLINGFORD IA 51365 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	OCCUP SELF EMPLOYED AGGREGATE T-T-D	225.00	
SUSSMAN, SYDNEY C/O NEW JERSEY NATL BANK 370 SCOTCH RD TRENTON NJ 08650 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	SHERWOOD INDUSTRIES 1621 N OLSEN AVE TRENTON	09-15-07	5,000.00
	OCCUP SELF EMPLOYED AGGREGATE T-T-D	5,000.00	
SUTTON, KERMIT S. 131 TONAWANDA DR	SELF 1400 UCS BLDG DES MOINES	09-15-07	1,000.00
DES MOINES IA 50312 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	OCCUP ATTORNEY AGGREGATE T-T-D	1,050.00	
SWANSON, JOHN E. 1240 49TH ST	SELF	10-20-07	100.00
VEST DES MOINES IA 50265 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	OCCUP ATTORNEY AGGREGATE T-T-D	200.00	
SUBTOTAL OF RECEIPTS THIS PAGE			7,225.00

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

Use separate schedules for each category of the General Summary Page

PAGE 1  
FOR LINE NO. 11c

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of collecting contributions or for any purpose, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE TO FILE

Republican Party of Iowa

PAC, IOWA BANK  
430 LIBERTY BLDG  
WES EHRECKE  
DES MOINES IA 50300  
FOR: ( ) PRIMARY ( ) GENERAL  
( ) OTHER

IOWA BANK PAC  
430 LIBERTY BLDG 12-07-07 500.0  
DES MOINES  
OCCUP POLITICAL ACT  
AGGREGATE Y-T-D 500.00

PAC, IOWA MEDICAL  
1001 GRAND AVE  
C/O JACK VERSTEEG  
WEST DES MOINES IA 50265  
FOR: ( ) PRIMARY ( ) GENERAL  
( ) OTHER

12-10-07 500.0  
OCCUP  
AGGREGATE Y-T-D 500.00

PAC, IOWA REALTORS  
C/O SUD EWELL  
999 OAKRIDGE DR.  
DES MOINES IA 50300  
FOR: ( ) PRIMARY ( ) GENERAL  
( ) OTHER

IOWA REALTORS PAC  
999 OAKRIDGE DR 07-20-07 1,000.00  
DES MOINES  
OCCUP POLITICAL ACT  
AGGREGATE Y-T-D 1,500.00

PAC, IOWA RESOURCES  
PO BOX 557  
DES MOINES IA 50303  
FOR: ( ) PRIMARY ( ) GENERAL  
( ) OTHER

IOWA RESOURCES  
PO BOX 557 11-05-07 350.00  
DES MOINES  
OCCUP PAC  
AGGREGATE Y-T-D 350.00

PAC, NATL EDUCATION ASSN  
1201 16TH ST NW  
WASHINGTON DC 20036  
FOR: ( ) PRIMARY ( ) GENERAL  
( ) OTHER

09-08-07 5,000.00  
OCCUP POLITICAL ACT  
AGGREGATE Y-T-D 5,000.00

NINTH DECADE FUND  
C/O BANK LEUMI  
1511 WALNUT ST  
PHILADELPHIA PA 19102  
FOR: ( ) PRIMARY ( ) GENERAL  
( ) OTHER

09-15-07 5,000.00  
OCCUP PAC  
AGGREGATE Y-T-D 5,000.00

8. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt (The For-)

Receipt For

Other (specify)

Primary

General

Occupation

Aggregate Year-to-Date

SUBTOTAL of Receipts This Page (General)

TOTAL The For- (see page 1 and 4 for number only)

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

EO-2

NOV 16 1987

Steven W. Roberts, Treasurer  
Republican Party of Iowa  
1540 High Street  
Des Moines, IA 50309

Identification Number: C00014698

Reference: Year End Report (7/1/87-12/31/87)

Dear Mr. Roberts:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a committee from receiving contributions from another political committee or person in excess of \$5,000 per calendar year. (2 U.S.C. §461a(2)) and 11 CFR 110.1(d))

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeds the limits, you should either refund to the donor the amount in excess of \$5,000 or, if appropriate, seek retribution of the contribution pursuant to 11 CFR 110.1(k). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests. (11 CFR 103.3(b) and 110.1(k))

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In the best interests of the committee, all refunds, retributions and transfers-out should be made within sixty days of the treasurer's receipt of

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the contribution. See 11 CFR 103.3(b). Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 36 or 39 of the report covering the period during which they are made. Reattributions are reported as memo entries on Schedule A of the report covering the period during which the authorization for the contribution is received.

Although the Commission may take further legal steps regarding the acceptance of an excessive contribution(s), prompt action by you to refund, seek retribution and/or transfer-out the excessive amount will be taken into consideration.

*g*  
-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. Under 11 CFR 102.5(b), organizations which are not political committees under the Act must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If your committee does not finance non-federal activity, the receipt of the referenced contribution(s) may violate the limitations and prohibitions of the Act. (2 U.S.C. §§41a(2) and 41b) If your committee engages in both federal and non-federal activity, either through a separate non-federal account, or one account that finances activity in connection with both federal and non-federal elections, your committee may be in violation of 11 CFR 102.5(a).

Please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received funds which are not permissible, the Commission recommends that you refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR 103.3(b). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. Refunds and transfers-out should be

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disclosed on a supporting Schedule B for Line 26 or 28 of the report covering the period during which they are made.

If the contribution(s) in question was incompletely or inaccurately disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of prohibited contributions, prompt action by your committee in refunding or transferring-out the amounts will be taken into consideration.

-Schedule D discloses a debt in the amount of \$40,000 owed to your committee by the committee's non-federal account. You are advised that any transfer from the non-federal to the federal account to repay this debt is prohibited by 11 CFR 102.5(a)(1)(i).

Please provide a Schedule B to support the entry reported on Line 25 of the Detailed Summary Page. All loans made by your committee must be itemized on Schedule B, regardless of the amount. 2 U.S.C. 434(b)(6)(B)(ii).

-Your report discloses a payment on Schedule C to Bankers Trust Co., which has not been recorded on Schedule B. Loan repayments must be reflected on Schedule B as well as on Schedule C. 2 U.S.C. 434(b)(5)(D).

-Line 11(a)(i) of the Detailed Summary Page of your report discloses a total of \$87,681.87 in itemized contributions from individuals. The sum of the entries itemized on Schedule A, however, indicates the total to be \$87,656.87. Please amend your report to clarify the discrepancy.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Joseph Pennington  
Reports Analyst  
Reports Analysis Division

88035131059



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

EQ-2

April 7, 1988

Steven W. Roberts, Treasurer  
Republican Party of Iowa  
1540 High Street  
Des Moines, IA 50309

Identification Number: C00014498

Reference: Year End Report (7/1/87-12/31/87)

Dear Mr. Roberts:

This letter is to inform you that as of April 6, 1988, the Commission has not received your response to our request for additional information, dated March 16, 1988. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Joseph Pennington on our toll-free number (800) 424-9530 or our local number (202) 376-2680.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

Use separate schedules for each category of the Detailed Summary Page

PAGE 1 OF 1  
FOR LINE NUMBER 14

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to collect contributions from such committee.

NAME OF COMMITTEE in Full  
**Republican Party of Iowa**

<b>A. Full Name, Mailing Address and ZIP Code</b> Republican Party of Iowa State Account 1540 High Street Des Moines, IA 50309	Name of Employer <b>Iowa repayment</b>	Date (month, day, year) <b>3-11-88</b>	Amount of Each Receipt this Period <b>40,000.00</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date <b>&gt; \$ 40,000.00</b>		
<b>B. Full Name, Mailing Address and ZIP Code</b>	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date <b>&gt; \$</b>		
<b>C. Full Name, Mailing Address and ZIP Code</b>	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date <b>&gt; \$</b>		
<b>D. Full Name, Mailing Address and ZIP Code</b>	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date <b>&gt; \$</b>		
<b>E. Full Name, Mailing Address and ZIP Code</b>	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date <b>&gt; \$</b>		
<b>F. Full Name, Mailing Address and ZIP Code</b>	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date <b>&gt; \$</b>		
<b>G. Full Name, Mailing Address and ZIP Code</b>	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date <b>&gt; \$</b>		

<b>SUBTOTAL of Receipts This Page (optional)</b>	
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NAME OF COMMITTEE (in Full)

Republican Party of Iowa

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A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Republican Party of Iowa State Acct. 1540 High St. Des Moines, IA 50309	Transfer to State Account	1-18-88	7,000.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General	1-29-88	25,000.00
	<input type="checkbox"/> Other (specify)	2-4-88	10,000.00
" " "	" "	2-8-88	10,000.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General	2-12-88	10,000.00
	<input type="checkbox"/> Other (specify)	2-16-88	10,000.00
" " "	" "	2-29-88	30,000.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General	1-6-88	6,000.00
	<input type="checkbox"/> Other (specify)	1-18-88	3,000.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Transfer of Iowa Realtors PAC contribution	3-1-88	500.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Transfer of Harbor Comm. Contribution	3-4-88	25.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General	3-1-88	500.00
" " "	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Transfer of Stroman Comm. contribution	3-4-88	175.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General	3-1-88	500.00
" " "	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Transfer of Rife Committee contribution	3-1-88	300.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
" " "	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Transfer of Swearingen Comm. contribution	3-1-88	300.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
" " "	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Transfer of Pellett Comm. contribution	3-1-88	300.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		

SUBTOTAL of Disbursements This Page (optional) .....	
TOTAL This Period (last page this line number only) .....	113,600.00

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TELECON

ANALYST: ELIZABETH JONES

CONVERSATION WITH: STEPHEN ROBERTS

COMMITTEE: REPUBLICAN PARTY OF IOWA

DATE: 5/27/88

SUBJECT(S): MARCH 16, 1988 RG-2

I brought to Mr. Roberts' attention that his committee had not answered the RG-2 or the second notice. He said he would call "over there" and ask why the letters had not been answered. He asked for the date of the RG-2 and said he would get back with me today.

Mr. Roberts called back about 5 minutes later and informed me that the committee had changed controllers. He said the change had occurred about the time that the letter arrived and that the letter had "fallen through the cracks." He stated that Gina Angelici is the new controller, and that she would call me today in regard to the letter. I mentioned the \$40,000 loan to the state account as one of the things I wanted to discuss. Mr. Roberts said he didn't know much about it, but that they would probably have to transfer the money.

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## TELECON

ANALYST: ELIZABETH JONES

CONVERSATION WITH: GINA ANGELICI

COMMITTEE: REPUBLICAN PARTY OF IOWA

DATE: 5/27/88

SUBJECT(S): RFAI DATED 3/16/88

Ms. Angelici informed me that she was transferring the money from unregistered organizations and excessive contributions and would be sending me copies of their responses to notification of the transfers as well as copies of the checks to the state account. We reviewed the AQ-2 and the itemizations therein. I told her that she needed to amend the YE to include the missing schedules as soon as possible, preferably within the week. I told her she would be receiving a letter soon questioning the \$40,000 debt repayment on the Q1, and that she needed to transfer the money to the state account and provide a copy of the check. Ms. Angelici and the committee's legal counsel had discussed the \$40,000. She said she would ask him about fixing the situation. I told her she needed to get all amendments to this office within the week. She said she would try to get everything to me by next Friday (6/3/88). Ms. Angelici has been the comptroller for approximately three weeks.

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TELECOM

ANALYST: ELIZABETH JONES

CONVERSATION WITH: GIINA ANGELICI

COMMITTEE: REPUBLICAN PARTY OF IOWA

DATE: 5/31/88

SUBJECT(S): RFAI DATED 3/16/88

Ms. Angelici told me that the federal account paid off a loan for the state account (the \$40,000 debt by the state account). She asked how the state account could repay the federal account, and I told her that it could not. In regard to the unregistered organizations on the RO-2, she asked what she needed to do if the organizations were no longer in existence. I told her that I did not know, but that I would find out and call her. She said to wait and that she would call me if she got no response from the organizations.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

FE-3

JUN 8 1988

Steven W. Roberts, Treasurer  
Republican Party of Iowa  
1540 High Street  
Des Moines, IA 50309

Identification Number: C00014498

Reference: April Quarterly Report (1/1/88-3/31/88)

Dear Mr. Roberts:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The Commission notes the transfer-out of the apparent impermissible funds received from organizations that are not registered political committees. Although the Commission may take further legal steps concerning the acceptance of impermissible funds, the prompt action by your committee will be taken into consideration.

-Schedule A of your report discloses a receipt of \$40,000 from the Republican Party of Iowa State Account (pertinent portion(s) attached). Please clarify whether this transfer is from an account maintained by your committee for non-federal activity. If so, be advised that such transfer is prohibited by 11 CFR 102.5(a)(1)(i) and the full amount of the transfer should be returned to the non-federal account. Please inform the Commission immediately in writing and provide a photocopy of your check for the transfer-out. In addition, the transfer-out should be disclosed on a supporting Schedule B for Line 20 of your next report.

Although the Commission may take further legal action regarding the acceptance of funds from a non-federal account, your prompt transfer-out of the funds in question, or clarification of the transaction, will be taken into consideration.

-Your report discloses transfers-out made to the Republican Party of Iowa State Account which appears to be the non-federal account of your committee. Please note that if any portion of such transfers/payments

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represents reimbursements of administrative expenses pursuant to 11 CFR 106.1, such reimbursements should be reported on Schedule B supporting Line 19 of the Detailed Summary Page for Operating Expenditures. Administrative expenses are those day-to-day expenses of operating the committee, including rent, utilities, salaries, office supplies and other miscellaneous costs. The federal account must pay its share of such costs.

If these transfers do not represent reimbursements of administrative expenses, please be advised that you must allocate such expenses between your federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis. 11 CFR 106.1(e) and 102.5(a)(1).

If your organization has incurred such administrative costs and your non-federal account has paid for all such costs, your federal account must reimburse the non-federal account for its portion of the expenses. The amount incurred by the federal account should be disclosed as a debt or obligation owed to the non-federal account on Schedule D supporting Line 10 of the Summary Page. When payments are made toward the debt, they should be reported on Schedule B supporting Line 19 of the Detailed Summary Page and the debt should be reduced by a corresponding amount.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

*Elizabeth Jones*

Elizabeth Jones  
Reports Analyst  
Reports Analysis Division

92040995999

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TELECON

ANALYST: ELIZABETH JONES

CONVERSATION WITH: GINA ANGELICI

COMMITTEE: REPUBLICAN PARTY OF IOWA

DATE: 6/23/88

SUBJECT(S): AMENDMENTS TO THE YEAR-END AND APRIL QUARTERLY REPORTS

Ms. Angelici asked if the Commission had a FAX machine so that she could send me a letter stating that a response to the requests for information were not possible by today. She said that all of the required transfers had been made. I told her that the Commission did not have a FAX machine, and that she needed to amend her reports as soon as possible.

92040905405



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, DC 20541

BQ-3

June 30, 1988

**Steven W. Roberts, Treasurer**  
**Republican Party of Iowa**  
**1340 High Street**  
**Des Moines, IA 50309**

**Identification Number: C00014498**

**Reference: April Quarterly Report (1/1/88-3/31/88)**

**Dear Mr. Roberts:**

This letter is to inform you that as of June 29, 1988, the Commission has not received your response to our request for additional information, dated June 8, 1988. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Elizabeth Jones on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

**John D. Gibson**  
**Assistant Staff Director**  
**Reports Analysis Division**

**Enclosure**

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**HAND DELIVERED**  
RECEIVED  
FEDERAL ELECTION COMMISSION

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Attachment 12  
Page 1 of 2

July 13, 1988

Elizabeth Jones  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

RE: April Quarterly Report (1/1/88-3/31/88)

Dear Ms. Jones:

Your letter of June 8, 1988 addressed to the Treasurer of the Republican Party of Iowa has been referred to me for response.

The committee's receipt of \$40,000 from the Republican Party of Iowa State Account is a transfer from an account maintained by the committee for non-federal activity. The funds were transferred in to reimburse the account for payments made from it toward a non-federal account debt. (See Schedule D of the 1987 Year End Report.) After reviewing the details of this situation with your office, you made a recommendation to transfer-out the \$40,000 and to remove the state account from the loan schedule. A copy of the transfer-out check is attached.

Transfers to the nonfederal account do not represent reimbursements of administrative expenses. The next reporting period will be the first period during this election cycle with federal expenditures and will allocate administrative expenses.

I hope this information answers your questions satisfactorily. If you should need any further assistance, please feel free to contact me.

Sincerely,

*Gina Angelica*  
Gina Angelica  
Comptroller

Enclosure

CC: Ralph Brown  
Stephen Roberts

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REPUBLICAN STATE CENTRAL COMMITTEE

FEDERAL ACCOUNT  
1540 HIGH ST., PH. 282-8168  
DES MOINES, IA 50319

31 May 1988

FOR THE  
CHECK OF Republican State Central Committee - Sub Account - \$150,000.00  
Forty thousand and 00/100 DOLLARS

Bankers Trust  
Des Moines, Iowa 50319

FOR FEE REQUEST

⑆000812⑆ ⑆0730006426 01 4052⑆

Jim English  
General Director



July 13, 1988

NOT DELIVERED

RECEIVED

88 JUL 15 AM 10:41

Attachment 13  
page 1 of 4

Joseph Pennington  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

RE: Year End Report (7/1/87-12/31/87)

Dear Mr. Pennington:

Your letter of March 16, 1988 addressed to the Treasurer of the Republican Party of Iowa has been referred to me for response.

You have questioned a contribution in excess of limits set forth in the Federal Election Act. Please find attached a written authorization from Randy Rodgers and a photocopy of the check for the transfer-out of those funds.

A contribution from the Ninth Decade Fund of \$5,000.00 has been transferred out of the Federal Account. A copy of the authorization and the transfer-out check is attached.

A Schedule B is enclosed to support the entry reported on line 25 of the Detail Summary Page.

A Schedule B is enclosed to support the entry reported on line 24 of the Detail Summary Page.

An amended Detail Summary Page and a Receipts and Disbursements Report Page are enclosed and reflect corrected addition.

If you should have any further questions, please feel free to contact me at this office.

Sincerely,

*Gina Angelici*  
Gina Angelici  
Comptroller

Enclosures

cc: Ralph Brown  
Stephen Roberts

92040905409  
11136 R11



April 27, 1988

Republican Party of Iowa  
1540 High Street  
Des Moines, Iowa 50309

Re: Contribution by Ninth Decade Fund

Dear Sir or Madam:

On September 10, 1987, the Ninth Decade Fund made a contribution of \$5,000 to your organization. We have been informed by the Federal Election Commission that this contribution was included in one of your reports to the Commission as a receipt with respect to federal elections.

The contribution made to your organization should not be used to influence any federal election, and we therefore direct that your organization transfer the funds to an account that is not used to influence federal elections.

Thank you.

Very truly yours,

*Gerald Gornish*  
Gerald Gornish  
Treasurer  
Ninth Decade Fund

GG:lk  
cc: Federal Election Commission  
Attn: Mr. Mike Tangney

REPUBLICAN STATE CENTRAL COMMITTEE  
FEDERAL ACCOUNT  
1540 HIGH ST. PH 282-8105  
DES MOINES, IA 50309

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13 July 88  
Republican State Central Committee - State Acct. — = 5,000 —  
Five thousand and 00/100 —

 Bankers Trust  
MEMBER FDIC

NINTH DECADE FUND CONTRIBUTION

10730006420 03 405

*Guia Angerica*

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(111) 605411

ARTICLE B ITEMIZED DISBURSEMENTS

Use separate schedules for each category of the Detailed Summary Form  
 PAGE 1 of 1  
 FOR LINE NUMBER 25

Information obtained from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (in Full)

Republican Party of Iowa

191210;450805412

A Full Name, Mailing Address and ZIP Code	Purpose of Disbursement (paying out of principal on loan make State Account)	Date (month, day, year) 9-21-87 9-28-87	Amount of Each Disbursement This Period \$20,000.00 \$20,000.00
Bankers Trust 7th & Grand Des Moines, Iowa 50309	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
B Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
C Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
D Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
E Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
F Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
G Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
H Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
I Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
J Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
K Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
L Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
M Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
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O Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
P Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Q Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
R Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
S Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
T Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
U Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
V Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
W Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
X Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL	
TOTAL	\$40,000.00

**SCHEDULE B**

**FINANCED DISBURSEMENTS**

Use separate statements for each category of the Detailed Summary Page	PAGE 3	OF 2
	FORM NUMBER 70	

Any information obtained from such Reports and Statements may not be used or used by any person for the purpose of making contributions or for commercial purposes, other than using the name and address of any political committee to which contributions have been made.

NAME OF COMMITTEE OR FUND			
Republican Party of Iowa			
A. Full Name, Mailing Address and ZIP Code Republican Party of Iowa State Acct. 521 E. Locust DM, IA 50300	Purpose of Disbursement Reimbursement for labels paid with contribution by Jay Tone Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, div., year) 5-04-88	Amount of Each Disbursement This Period 16.00
B. Full Name, Mailing Address and ZIP Code " "	Purpose of Disbursement Transfer-out of prohibited transfer-in from State Acct. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, div., year) 5-31-88	Amount of Each Disbursement This Period 40,000.00
C. Full Name, Mailing Address and ZIP Code Republican Party of Iowa State Acct. 517 E. Locust DM, IA 50300	Purpose of Disbursement Transfer of Royer Comm. Contribution to State Acct. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, div., year) -14-88	Amount of Each Disbursement This Period 250.00
D. Full Name, Mailing Address and ZIP Code " "	Purpose of Disbursement Transfer of Harbor Committee Contribution to State Acct. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, div., year) -24-88	Amount of Each Disbursement This Period 500.00
E. Full Name, Mailing Address and ZIP Code " "	Purpose of Disbursement Transfer of IA Thiropro Contribution to State Acct. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, div., year) -24-88	Amount of Each Disbursement This Period 250.00
F. Full Name, Mailing Address and ZIP Code " "	Purpose of Disbursement Transfer of Iowa Bank Pac Contribution to State Acct. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, div., year) -24-88	Amount of Each Disbursement This Period 500.00
G. Full Name, Mailing Address and ZIP Code " "	Purpose of Disbursement Transfer of IA F.O.R.E. PAC Contribution to State Acct. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, div., year) -24-88	Amount of Each Disbursement This Period 500.00
H. Full Name, Mailing Address and ZIP Code " "	Purpose of Disbursement Transfer of Carpenter Committee Contribution to State Acct. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, div., year) -24-88	Amount of Each Disbursement This Period 250.00
I. Full Name, Mailing Address and ZIP Code " "	Purpose of Disbursement Transfer of C. Beardorf Contribution to State Account. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, div., year) -26-88	Amount of Each Disbursement This Period 5,000.00

<b>SUBTOTAL</b> of Disbursements This Page (optional) .....	8,000.00
<b>TOTAL</b> This Period (has same file and number as 1)	8,000.00

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**SCHEDULE B ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	PAGE 2 OF 2
	FOR LINE NUMBER 30

Information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial use, other than using the name and address of any political committee to solicit contributions from such committee.

**NAME OF COMMITTEE (in Full)**  
**Republican Party of Iowa**

<b>A. Full Name, Mailing Address and ZIP Code</b> Republican Party of Iowa State Acct. 521 E. Locust. Desm. IA 50309	<b>Purpose of Disbursement</b> Transfer of Rogers, Randall Contribution to State Acct. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b> 6-08-88	<b>Amount of Each Disbursement This Period</b> 3,475.00
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<b>B. Full Name, Mailing Address and ZIP Code</b> Republican Party of Iowa State Account 521 East Locust Desm Oines, IA 50309	<b>Purpose of Disbursement</b> Transfers to State Account Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b> 4-26-88 4-29-88	<b>Amount of Each Disbursement This Period</b> 50,000.00 10,000.00
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<b>C. Full Name, Mailing Address and ZIP Code</b> 4	<b>Purpose of Disbursement</b> " " " "	<b>Date (month, day, year)</b> 5-11-88	<b>Amount of Each Disbursement This Period</b> 30,000.00
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<b>D. Full Name, Mailing Address and ZIP Code</b> 54	<b>Purpose of Disbursement</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
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<b>E. Full Name, Mailing Address and ZIP Code</b> 09	<b>Purpose of Disbursement</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
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<b>F. Full Name, Mailing Address and ZIP Code</b> 20	<b>Purpose of Disbursement</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
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<b>G. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
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<b>H. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
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<b>I. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
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<b>TOTAL of Disbursements This Page (optional)</b> .....			
<b>TOTAL This Period (last page this line number only)</b> .....			140,741.90

**COMPUTATION OF ALLOCATION FOR FEDERAL ACTIVITY**

**July Quarter Report (April 1, 1988 to June 30, 1988) .**

1. Total expenses year-to-date	<u>\$546,573.24</u>
2. Total expenses for Federal activity year-to-date	<u>4,000.00</u>
3. Percent of expenses for Federal activity	<u>0.7%</u>
4. Total administrative expenses	<u>302,636.01</u>
5. Multiply administrative expenses by % of factor	<u>2,214.69</u>
6. Allocation year-to-date	<u>2,214.69</u>
7. Less allocation paid to date	<u>15,000.00</u>
8. Total due this reporting period	<u>(\$11,973.64)</u>

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**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20543

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**Stephen W. Roberts, Treasurer**  
**Republican Party of Iowa**  
**521 East Locust**  
**Des Moines, IA 50309**

SEP 7 1982

**Identification Number: C00014498**

**Reference: July Quarterly Report (4/1/82-6/30/82)**

**Dear Mr. Roberts:**

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Under 11 CFR 106.1(e), "party committees and other political committees which have established Federal campaign committees pursuant to 11 CFR 102.5 shall allocate administrative expenses on a reasonable basis between their Federal and non-Federal accounts in proportion to the amount of funds expended on Federal and non-Federal elections, or on another reasonable basis."

It appears from the "Computation of Allocation For Federal Activity" attached to your July Quarterly Report that the allocation for the Federal portion of the administrative expenses was based solely on direct contributions to Federal candidates, while the allocation for the non-Federal portion of said expenses was based on all expenditures for non-Federal activity. A reasonable method of allocating administrative expenses is to consider direct contributions to Federal candidates versus direct contributions to non-Federal candidates. Enclosed is Advisory Opinion 1982-5 which may assist you in recalculating the Federal share of your committee's administrative expenses.

Please amend your report to reflect the additional administrative expenses incurred by your committee.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to

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Contact us on our toll-free number, (800) 424-9838. My local number is (303) 376-3488.

Sincerely,



Elizabeth Jones  
Reports Analysis  
Reports Analysis Division

68035451922

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**Advisory Opinion**

10-220

participation in the various meetings and the bookkeeping services offered might, under some circumstances, render a help providing such services on the campaign should a political committee. While I did not go so far as to conclude in that case, it would appear to me that the kind of activity suggested by Colwell, Smith & Brown plus their usual intent to establish a permanently political committee plan would be consistent with the plan a political committee. I therefore conclude that the services rendered by the partnership in this case are not incidental pecuniary transactions, but are financial transactions in support of a political campaign. The partnership would be entitled to spend up to \$5,000.00 per year in support of the political committee.

There are but a few of the significant issues raised by this Advisory Opinion Report. The primary consideration of such issues by the Committee is dispositive. The conclusions reached by the Committee when a majority of my attempt to regulate and disclose such partnership activities which will inevitably influence the political process.

Dated: April 23, 1952.

Commissioner Thomas E. Swick joins in this dissent.

**ADVISORY OPINION - Situation of Business for Party Conference**

Reference is made to your letter dated February 2, 1952, and supplementary materials submitted on March 12, 1952, requesting an advisory opinion on behalf of the Democratic National Committee ("DNC"), and the 1952 Democratic Campaign Committee (DCCC, Inc. ("the Conference Committee"), concerning application of the Federal Election Campaign Act of 1947, as amended, ("the Act"), and Committee regulations in certain aspects of a national party conference to be held in Jan., 1952.

This request is your letter dated February 2, 1952, and supplementary materials submitted on March 12, 1952, requesting an advisory opinion on behalf of the Democratic National Committee ("DNC"), and the 1952 Democratic Campaign Committee (DCCC, Inc. ("the Conference Committee"), concerning application of the Federal Election Campaign Act of 1947, as amended, ("the Act"), and Committee regulations in certain aspects of a national party conference to be held in Jan., 1952.

The issue that the DNC, in conjunction with the Conference Committee, will hold a three day "National Party Conference" in Jan., 1952, in Philadelphia, Pennsylvania. The National Business Letter to State Party Chairmen contained in your supplementary materials states that the Conference will provide a "forum for discussion on public policy issues...and a mechanism for party-building and building of candidates and political leaders...." The issue that the first day of the conference will be devoted to "workshops and chairmen working progress in campaign and Democratic party organizing with emphasis on 1952 Democratic campaign." These campaign workshops will focus on fundraising, polling, canvass, newspaper, and media for party workers, and Federal, state and local candidates. The second day of the conference will include workshops for the purpose of discussing issues of public policy. Among the topics upon which workshops will be conducted are "Training Economic Growth and Opportunity," "Foreign Policy, Defense and Arms Control," and "Building Government That Matters." Each workshop will include a presentation by a panel of elected Democrats and experts followed by a dialogue between panelists and workshop participants.

The participants in the Conference will include members of the DNC, individuals selected by the Central Committee of the State Democratic Parties and other Democratic organizations, as well as one hundred participants selected "at large." The party resolution calling for the conference provides for the selection of "replacement" participants in the event any originally selected participants are unable to attend the conference. You indicate that replacement participants may attend any of the campaign building and issue workshops held during the conference. You indicate further that persons other than participants and replacement participants may observe the issue workshops held on the second conference day.

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**Options**

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The act does, whether the Conference Committee may accept and use corporate and labor organization treasury funds and funds donated by persons in excess of the contribution limits of 2 U.S.C. 6411a to defray that portion of the expenses of the described 1982 party conference which may be allocated to non-federal conference activity. Second, you ask for Committee guidance with respect to the manner of determining the portion of conference expenses that may be allocated to non-federal election activity. In this regard, you describe several methods of allocation of expenses that you wish the Committee to approve for use by the DNC and the Conference Committee in allocating the expenses of the conference between Federal and non-federal election activity.

Your questions with respect to financing the planned DNC conference raise the threshold issue of whether conference expenses are required to be allocated at all other it does not appear that the conference is being held for the purpose of fundraising, or in connection with, the specific election of any clearly identified candidate for Federal office. The Committee considered this issue but could not agree by the requisite two affirmative votes that conference expenses were required or were not required to be allocated to Federal and non-federal elections. See 2 U.S.C. 6457(a).

Since your request indicates the DNC's intention to allocate conference expenses pursuant to 11 CFR 102.3 and 102.1 and since you have sought the Committee's guidance as to the reasonableness of several allocation formulas, the Committee will address each proposed method.

**Ballot Position Method.** Allocation of expenses to reflect Federal and non-Federal activity could be based on a ratio of Federal ballot positions to non-Federal ballot positions in the November 1982 election on a nationwide basis. The Committee recognizes that the number of non-Federal ballot positions is substantially greater than the number of Federal ballot positions, and that many state and local offices are not comparable to Federal offices. The Committee concludes that the use of this allocation method with respect to allocating conference expenses would be reasonable under the act and regulations. See H.R. REP 1076-72 (1982), copy enclosed.

**Funds Expended Method.** Under this method, the DNC's allocation of conference expenses would be based on a ratio of funds expended in direct support of Federal candidates to funds expended in direct support of non-federal candidates over a certain period of time. "Direct support" of Federal candidates would include only those contributions by the DNC (including the Democratic congressional and senatorial campaign committees) to candidates for Federal office which were subject to the contribution limits of 2 U.S.C. 6411a, and coordinated party expenditures made pursuant to 2 U.S.C. 6411(d) on behalf of Federal candidates. "Direct support" of non-federal candidates would include contributions to and expenditures directly on behalf of such candidates by the DNC (including any of its auxiliary units). General administrative costs not directly attributed to a particular candidate would not be included in this formula. The Committee concludes that use of this allocation method would be reasonable under the act and regulations in determining the allocation of expenses of the planned DNC conference. The time period on which a ratio would be based using this allocation method would be the election cycle directly preceding or subsequent to this conference. Thus, the Conference Committee would have the option of basing a ratio on the 1980 election cycle or on the 1982 election cycle. "Election cycle" is defined by the regulations at 11 CFR 102.3(b).

**Funds Received Method.** Use of this method would not be permissible to allocate the expenses of the planned conference, because allocation of expenses is determined by the nature of the activity engaged in, rather than the amount of contributions received by a party committee during a given period of time. This method is designed for use by

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## Advisory Opinions

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expenditures that exceed in direct support of candidates and that allocate their indirect support expenses.

None of this is the conference funds devoted to activities unrelated to Federal elections in relation to total time for conference activities. Now this formula, the Federal portion of the conference fund is calculated by dividing the time devoted to Federal candidates or elections by the total conference time and multiplying the conference costs by the resulting percentage. The Commission concludes that the use of this allocation method to allocate the conference expenses between Federal and non-Federal activity would be reasonable under the Act and regulations.

None of expenditures Federal candidates and their agents to participating non-Federal candidates and their workers. The Commission concludes that use of this formula would be reasonable under the Act and regulations provided that participants who are identified as belonging to both Federal and non-Federal categories or to neither category, are favored into the ratio in the same proportion as the number of Federal candidates and workers bears to the number of state and local candidates and workers.

The foregoing methods are not exhaustive of those that may be reasonable, but they are the methods you have asked the Commission to consider at this time. Regardless of the allocation method that the Conference Committee chooses to use in allocating conference expenses, several allocations may not be possible until some time after the close of the conference. Thus, a preliminary estimate may be used with adjustments and then an actual proportion are determined. The Conference Committee should maintain detailed records supporting the allocations that are proposed and the percentage derived should be applied to all conference expenses.

The Commission expresses no opinion as to the possible application of any State law to the Federal situation described here.

This response constitutes an advisory opinion concerning application of the Act, or regulations promulgated by the Commission, to the specific transaction or activity set forth by your request. See 2 U.S.C. 6437f.

Dated: April 21, 1972.

- y Commission records indicate that the NRC held a mid-term national party conference in December, 1970 in Memphis, Tennessee. An audit of the 1970 Conference Arrangements Committee resulted in a Commission finding that the Committee was not a "political committee" as defined by the Act and thus, was not subject to the registration and reporting requirements of the Act. The 1970 conference included a series of issue workshops but did not offer campaign training workshops for candidates and campaign workers.

FINANCIAL OPINION OF COMMISSIONER THOMAS L. BROWN

TO ADVISORY OPINION 1972-2

I dissent from the majority opinion in this matter for reasons previously stated in Advisory Opinions 1970-10 [63340] and 1970-46 [63340].

Congress has forbidden corporations and unions to make contributions or expenditures in connection with Federal elections, with certain exceptions not here applicable. 6441b. Congress has not, however, barred corporation or union money from state elections, again with certain exceptions. The tension between these two

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TELECON

ANALYST: ELIZABETH JONES

CONVERSATION WITH: GINA ANGELICI AND RALPH BROWN

COMMITTEE: REPUBLICAN PARTY OF IOWA

DATE: 9/22/88

SUBJECT(S): RFAI DATED 9/7/88

Mr. Brown has been the committee's legal counsel since 1977. He said that the committee had allocated administrative expenses this way since 1980. He wanted to argue that this is a reasonable basis. I told him it isn't from the way it appears.

He said they base their allocation formula on total federal expenses—that they get the percentage as it relates to total administrative expenses. I tried to explain that it appeared that they based the formula on contributions to federal candidates v. total administrative expenses. He said that the contributions were the only federal expenses they had. I told him that they had to consider fundraising expenditures for federal candidates, etc. v. the same expenses for non-federal candidates. He said they had no non-federal candidates, only caucuses and primaries. He said they maintain two separate accounts.

Mr. Brown said the AD I sent with the RFAI didn't apply to his committee as it dealt with party conferences.

I was unable to make Mr. Brown understand why I had sent the letter so I told him I would have Lisa Stolaruk

call him.

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## Telecon

Conversation With: Mr. Ralph Brown, Attorney  
(515) 992-3728

FEC Staff: Lisa Stolaruk

Committee: Republican Party of Iowa

Date: September 23, 1988

Subject: Federal Account Allocation of Administrative Expenses

I called Mr. Brown this morning in order to discuss the federal account's allocation of administrative expenses. I asked that he explain how the Committee calculated an allocation of only 0.7% (\$2,214.69) in administrative expense payments made to the non-federal account during the July Quarterly reporting period.

Mr. Brown explained that they took the total expenditures of the federal account and the total amount of contributions to federal candidates, which was 0.7% of the total. Out of the grand total of expenses, the Committee took the total amount of administrative-type expenses and multiplied it by 0.7%.

I stated that the formula did not appear to take into account the activity that occurs in the Committee's non-federal account. I explained that, if the federal account is considering only contributions to federal candidates in the allocation, then all contributions to non-federal candidates from the non-federal account has to be included as well. Alternatively, if the Committee wished to consider all expenses of the federal account, then all of the expenses of the non-federal would have to be included in the allocation formula.

Mr. Brown felt that the regulation at 106.1(e) did not lend itself to that interpretation and that furthermore, the regulation mentions "another reasonable basis" as a method of allocation. He felt that the Committee's method was reasonable, but stressed that, if not satisfactory to the Commission, the Committee would be willing to adjust its allocation so long as a simple method can be agreed upon.

I asked Mr. Brown to submit an explanation regarding the Committee's allocation formula, explain why the Committee felt it was reasonable and that we would proceed from there. He stated that he would comply with my request.

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**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20543

EG-3

September 29, 1988

**Stephen W. Roberts, Treasurer**  
**Republican Party of Iowa**  
521 East Locust  
Des Moines, IA 50309

**Identification Number: C00014490**

**Reference: July Quarterly Report (4/1/88-6/30/88)**

**Dear Mr. Roberts:**

This letter is to inform you that as of September 28, 1988, the Commission has not received your response to our request for additional information, dated September 7, 1988. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Elizabeth Jones on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

*John D. Gibson*  
John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

3 8 7 3 3 4 3 1 6 9 2

**McDONALD, BROWN & KIMPLE**

ATTORNEYS AT LAW  
202 - 12TH STREET  
P.O. BOX 200

DALLAS CENTER, IOWA 50202-0200

October 20, 1988

FEDERAL ELECTION COMMISSION

SOCT 24 AM 21

OUR HQ. CALL (502)-752-1100

JAMES C. McDONALD  
DAVID M. BROWN  
JOHN W. KIMPLE  
CHARLES H. PUGH

TELEPHONE  
502-522-0700

Ms. Elisabeth Jones  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

RE: Republican Party of Iowa  
Identification No.: C00014498

Dear Ms. Jones:

Following telephone conversations with you and Lisa Stolaruk, and at the request of Ms. Stolaruk, please consider this letter as a response to your letter directed to the Republican Party of Iowa dated September 7, 1988.

While your letter did not specifically indicate that an error was made in the Party's reporting of the allocation of administrative expenses, it did question the method we have used.

For reference purposes, and marked Attachment "1", I enclose a copy of our computation of allocation for federal activity for the report covering the period ending June 30, 1988. Further, marked Attachment "2", I enclose a copy of a similar computation attached to our report for the period ending September 30, 1980.

Attachment "2" represents the format attached to our reports during campaign years 1976, 1978, and 1980 ... while Attachment "1" reflects the attachments to reports in campaign years 1982, 1984, 1986, and 1988. In short, we have been utilizing the identical method since 1976. I know, because as executive director of the Republican Party of Iowa in 1976, I drafted the narrative attachment as represented by Attachment "2".

The format was changed following an audit by the Federal Election Commission in which the Commissioner recommended that instead of maintaining one account for both federal and state activity, that the Party maintain two separate accounts. Generally speaking, nearly all contributions are deposited originally in the federal

3 1 1 3 6 9 2 1 7 3

Ms. Elizabeth Jones  
RE: Republican Party of Iowa  
October 20, 1988  
Page 2

account. From that account expenditures are made in connection with federal activity and some state activity, while the bulk of the funds in the federal account are transferred to the state account for spending from that account.

We are very familiar with 11 CFR §106.1(e) which provides that Party committees which have established federal campaign committees:

"shall allocate administrative expenses on a reasonable basis between their federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis."

We feel that we have allocated administrative expenses in proportion to the amount of funds expended on federal and non-federal elections.

We first show total expenses of the Republican Party of Iowa ... followed by expenses for federal activity only. We then apply the percent of our total expenses for federal activity against our total administrative expenses. This results in the determination of an allocation.

There was some question on your part that our allocation through June 30, 1988, seemed to be a small amount.

By now, our September quarterly report has been filed, and you will note that our total expenses for federal activity for the year has increased from \$4,000 to \$56,342.42 and our allocation has risen from \$2,214.69 to \$22,862.79.

We believe that we are following the requirement of the Commission's current regulations ... although we understand on September 22, 1988, the Commission issued a Notice seeking comments on possible revisions to the rules relating to allocation.

The Republican Party of Iowa stands ready to fully comply with any and all requirements. If, upon review, you have authority to demonstrate that our current method of allocation is incorrect, we will be more than happy to follow your direction. Our September quarterly report showed that we already had paid \$75,000 from the federal account to the state account for the allocation, which leaves us a credit of \$52,137.21 for computations following October 1, 1988.

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31135602175

Re. Elisabeth Jones  
RE: Republican Party of Iowa  
October 20, 1988  
Page 3

Obviously if the Commission amends the regulation we will follow any new regulations to the best of our ability.

We look forward to your response in order that we may know whether further action is required or not.

Very truly yours,

*Ralph Brown*  
Ralph S. Brown  
General Counsel,  
Republican Party of Iowa

RRB:sp

cc: Gina Angelici  
Assistant Treasurer  
Republican Party of Iowa

92040905426  
33035602177

COMPUTATION OF ALLOCATION FOR FEDERAL ACTIVITY  
July Quarter Report (April 1, 1968 to June 30, 1968)

1. Total expenses year-to-date	<u>2216,673.24</u>
2. Total expenses for Federal activity year-to-date	<u>4,000.00</u>
3. Percent of expenses for Federal activity	<u>0.73</u>
4. Total administrative expenses	<u>302,636.01</u>
5. Multiply administrative expenses by % of factor	<u>2,216.69</u>
6. Allocation year-to-date	<u>2,216.69</u>
7. Less allocation paid to date	<u>15,000.00</u>
8. Total due this reporting period	<u>1811,973.64</u>

99033602478



# REPUBLICAN STATE CENTRAL COMMITTEE OF IOWA

1040 HIGH STREET DES MOINES, IOWA 50319 (515) 281-0100

STEPHEN W. ROBERTS, Chairman  
DORIS STADENWILLER, Co-Chairman  
TERRY L. JENSEN, Treasurer

October 15, 1980

The expenditures on Schedule F are those which, under 14 U.S.C. 441a (d) (3), the Republican State Central Committee of Iowa is allowed to make expenditures totaling \$14,720 in connection with each of Iowa's six congressional campaigns, and \$61,235.20 for the U. S. Senate races.

Under regulation section 102.6 the Republican State Central Committee of Iowa files as this federal report both federal and non-federal activities. Since the Committee's activity in federal elections is limited, the bulk of this report relates solely to the Committee's state and local activities.

Under section 56.18 et seq. of the Code of Iowa, the Republican State Central Committee receives income tax checkoff proceeds from the Iowa income tax. Between December 1, 1978, and September 30, 1980, a total of \$209,704.50 was received from the State Comptroller in income tax checkoff proceeds. These funds are maintained in a separate checking account as required by state law.

Contributions to each of our federal candidates (not to exceed \$5,000) and expenditures on behalf of each federal candidate are made only from this account. No other state party funds are used in connection with the federal elections. Accordingly, it has not been necessary to solicit funds (Reg. sec. 102.6 (b)) with an express statement that the contribution will be used for federal elections.

From January 1, 1980, to September 30, 1980, this report indicates total expenditures by the Republican State Central Committee of Iowa in the amount of \$644,703.37. During this period, \$5,000 has been contributed to federal candidates, and \$29,448.56 has been expended on behalf of federal campaigns.

Under regulation section 106.1 (a), we are required to allocate administrative expenses on a reasonable basis between our federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis.

Accordingly, since 18.71 percent of our expenditures between January 1, 1980 and September 30, 1980, have been in connection with the federal election, we are allocating 19.71 percent of our remaining administrative expenses as required. Administrative expenses during this period total \$253,795.56--so the allocation is \$47,485.15, all of which has been paid from the income tax checkoff account which is solely used for federal expenditures.

93035602179



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20543

FE-2

DEC. 7 1988

**Steven W. Roberts, Treasurer**  
**Republican Party of Iowa**  
**511 East Locust**  
**Des Moines, IA 50309**

**Identification Number: C80016000**

**Reference: Amended July Quarterly Report (4/1/88-6/30/88 - dated 10/20/88)**

**Dear Mr. Roberts:**

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-In a letter dated October 20, 1988, your committee explained that "...nearly all contributions are deposited in the federal account. From that account expenditures are made in connection with federal activity and some state activity, while the bulk of the funds in the federal account are transferred to the state account for spending from that account."

It appears that your committee maintains one account for federal activity and a separate account for non-federal activity. While this type of arrangement is provided for under the current regulations (see 11 CFR 102.5(a)(1)(i)), there are certain restrictions on the funds that may be deposited into the federal account. Specifically, only contributions meeting the following conditions may be deposited into the federal account: 1) Contributions designated for the federal account; 2) contributions that result from a solicitation which expressly states that the contribution will be used in connection with a federal election; and 3) contributions from contributors who are informed that all contributions are subject to the prohibitions and limitations of the Act. See 11 CFR 102.5(a)(2)(i) through (iii).

Your committee's practice of initially depositing almost all contributions in the federal account does not appear to comply with the provisions of 11 CFR 102.5(a)(2)(i) through (iii), as described above.

2040000267

Please provide an explanation or further clarification regarding the money deposited into your federal account.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2400.

Sincerely,



Elizabeth Jones  
Reports Analyst  
Reports Analysis Division

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9 2 0 4 0 9 0 5 4 3 0



FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20543

EQ-3

December 30, 1988

Steven W. Roberts, Treasurer  
Republican Party of Iowa  
521 East Locust  
Des Moines, IA 50309

Identification Number: C00014498

Reference: Amended July Quarterly Report (4/1/88-6/30/88) dated  
10/20/88

Dear Mr. Roberts:

On December 7, 1988 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your December 12, 1988 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-In a letter dated October 20, 1988, your committee explained that "...nearly all contributions are deposited in the federal account. From that account expenditures are made in connection with federal activity and some state activity, while the bulk of the funds in the federal account are transferred to the state account for spending from that account."

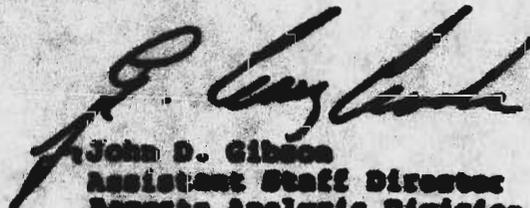
It appears that your committee maintains one account for federal activity and a separate account for non-federal activity. While this type of arrangement is provided for under the current regulations (see 11 CFR 102.5(a)(1)(i)), there are certain restrictions on the funds that may be deposited into the federal account. Specifically, only contributions meeting the following conditions may be deposited into the federal account: 1) Contributions designated for the federal account; 2) contributions that result from a solicitation which expressly states that the contribution will be used in connection with a federal election; and 3) contributions from contributors who are informed that all contributions are subject to the prohibitions and limitations of the Act. See 11 CFR 102.5(a)(20(i) through (iii)).

Your committee's practice of initially depositing almost all contributions in the federal account does not appear to comply with the provisions of 11 CFR 102.5(a)(2)(i) through (iii), as described above. Please provide an explanation or further clarification regarding the money deposited into your federal account.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Elizabeth Jones on our toll-free number (800) 424-9530 or our local number (202) 376-2400.

Sincerely,

  
John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

02  
7531



Ms. Elizabeth Jones  
 Federal Election Commission  
 January 17, 1989  
 Page 2

You cite the requirements of 11 CFR 102.5(a)(2)(i) through (iii) relating to the restrictions on funds that may be deposited in this federal account.

Let me assure you, Ms. Jones, that we are fully aware of the requirements of the law ... fully comply with the law ... and deposit only those funds into the federal account which result from a solicitation which expressly states that the contribution will be used in connection with the federal election.

All fundraising solicitations of the Republican Party of Iowa contain the following language:

The Federal Election Commission requires us to request the following:

OCCUPATION \_\_\_\_\_

NAME OF EMPLOYER \_\_\_\_\_

PLACE OF BUSINESS \_\_\_\_\_

Several years ago we were advised by Mark Braden, Counsel of the Republican National Committee, that this language would meet the requirement of the regulations.

It is most surprising that your letter of December 7 would state:

"Your committee's practice of initially depositing almost all contributions in the federal account does not appear to comply with the provisions of 11 CFR 102.5(a)(2)(i) through (iii), as described above."

I am stunned that you would make such an unfounded allegation, because we do comply with the regulations.

I might note, however, that there was only one exception. All proceeds received from the State of Iowa income tax check-off are deposited in the federal account. This was fully disclosed to the Commission in Advisory Opinion Request 1978-9 and addressed by the Commission in Advisory Opinion 1978-9 dated July 21, 1978.

720497303434

Ms. Elizabeth Jones  
Federal Election Commission  
January 17, 1989  
Page 3

I trust the foregoing will be fully responsive to your letter of  
December 7, 1988.

Very truly yours,

  
Ralph R. Brown  
General Counsel,  
Republican Party of Iowa

RRB:sp

cc: John D. Gibson  
Gina Angelici

92040905435

SCHEDULE A

7 Mid-Year Report  
ITEMIZED RECEIPTS

PAGE 8 OF 21  
LINE NUMBER 11A

ANY INFORMATION COPIED FROM SUCH REPORTS OR STATEMENTS MAY NOT BE SOLD OR USED BY ANY PERSON FOR THE PURPOSE OF SOLICITING CONTRIBUTIONS OF POLITICAL COMMITTEES, OTHER THAN USING THE NAME AND ADDRESS OF ANY POLITICAL COMMITTEE TO SOLICIT CONTRIBUTIONS FROM SUCH COMMITTEE.

Attachment 23  
page 1 of 5

REPUBLICAN STATE CENTRAL COMMITTEE OF IOWA

NAME, ADDRESS AND ZIP CODE	EMPLOYER	DATE	AMT EA P.
HAMPTON, W. RILEY 221 WASHINGTON DR NE CEDAR RAPIDS IA 52402 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	STATE OF IOWA 5400 16TH AVE CEDAR RAPIDS	04-21-87	300.00
MARION FOR REP COMMITTEE DR	State Candidate's Comm. not required to register as federal comm.	02-09-87	500.00
WENDERSON FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	OCCUP CAMPAIGN COMM AGGREGATE Y-T-O	500.00	
HARNS, HAROLD W. 514 PINE ST, BOX 78 BRUNSVILLE IA 51008 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	SELF	03-25-87	300.00
HARTVIG, HARVIN D 212 W POST IOWA CITY IA 52240 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	MARY HARTVIG INC P O BOX 1906 IOWA CITY	03-25-87	500.00
MAYES, ALVA 4021 45TH ST DES MOINES IA 50310 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	OCCUP RETIRED AGGREGATE Y-T-O	02-06-87	300.00
HIGGS, HAL W 420 WENSAQUA WAY DES MOINES IA 50309 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	HOLMES MURPHY ASSOC 420 WEO DES MOINES	02-06-87	500.00
HUCKENBERG, MARLON 2600 SPANCO, 5403 DES MOINES IA 50312 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	DAVIS, HUCKENBERG, & I 2300 FINANCIAL CENT DES MOINES	02-20-87 04-13-87 05-24-87	50.00 175.00 125.00
	OCCUP LAWYER AGGREGATE Y-T-O	300.00	
SUBTOTAL OF RECEIPTS THIS PAGE			2,700.00

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37751812571

## SCHEDULE A ITEMIZED RECEIPTS

PAGE 5 OF 21  
LINE NUMBER 11A

ANY INFORMATION COPIED FROM SUCH REPORTS OR STATEMENTS MAY NOT BE SOLD OR USED BY ANY PERSON FOR THE PURPOSE OF SOLICITING CONTRIBUTIONS OF A COMMERCIAL PURPOSES, OTHER THAN USING THE NAME AND ADDRESS OF ANY POLITICAL COMMITTEE TO SOLICIT CONTRIBUTIONS FROM SUCH COMMITTEE.

REPUBLICAN STATE CENTRAL COMMITTEE OF IOWA

Page 2 of 5

NAME, ADDRESS AND ZIP CODE	EMPLOYER	DATE	AMT L.S.D.
HOLDEN, EDGAR W 2240 E 46TH ST DAVENPORT IA 52807 FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	STATE OF IOWA DES MOINES OCCUP STATE SENATOR AGGREGATE Y-T-D	02-25-87	300.
MULDRON, JOHN S. RR 2	SELF	03-04-87	300.
ODEBOLT FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	OCCUP FARMER AGGREGATE Y-T-D	300.00	
MULSE, MERLIN R R	SELF	03-16-87 03-25-87	500.0 10.0
CLARENCE FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	OCCUP FARMER AGGREGATE Y-T-D	510.00	
IVERS, OPEY D 110 BICENTENNIAL CT WESTER CITY IA 50595	LAND O LAKES RR 2 WESTER CITY OCCUP RESEARCH GENE AGGREGATE Y-T-D	03-20-87	600.0
JACK RIFE FOR SENATE	State Candidate's Comm. not required to register as federal comm.	03-04-87	300.00
MOSCO FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	OCCUP Committee AGGREGATE Y-T-D	300.00	
JENKINS, NANCY J. 2110 BLAKE BLVD SE CEDAR RAPIDS IA 52403	CRESSWELL, MUNSSELL, 4211 SIGNAL RIDGE N CEDAR RAPIDS	03-04-87	250.00
JENKINS, CLARENCE F. 1070 W JEFFERSON	OCCUP SENIOR ACCT. AGGREGATE Y-T-D	250.00	
WINTERS, T FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER	GRIP-TITE WFC CO IN 115 W JEFFERSON WINTERS, I OCCUP PRESIDENT AGGREGATE Y-T-D	03-04-87	500.00
SUBTOTAL OF RECEIPTS THIS PAGE			2,760.0

371340:233?

ANY INFORMATION COPIED FROM SUCH REPORTS OR STATEMENTS MAY NOT BE SOLD OR USED BY ANY PERSON FOR THE PURPOSE OF SOLICITING CONTRIBUTIONS OF FOR COMMERCIAL PURPOSES, OTHER THAN USING THE NAME AND ADDRESS OF ANY POLITICAL COMMITTEE TO SOLICIT CONTRIBUTIONS FROM SUCH COMMITTEE.

Attachment 23  
page 3 of 5

REPUBLICAN STATE CENTRAL COMMITTEE OF IOWA

NAME, ADDRESS AND ZIP CODE	EMPLOYER	DATE	AMT. C.D.P.
STANLEY, ELIZABETH M. 115 SUNSET DR		05-18-87	500.0
PURCHASER POP: ( ) PRIMARY ( ) GENERAL ( ) OTHER	IA 52761 OCCUP RETIRED AGGREGATE Y-T-D		500.00
STILL, PRISCILLA M. RR 2 BOX 214		03-04-87 05-26-87	300.0 19.5
SCRANTON POP: ( ) PRIMARY ( ) GENERAL ( ) OTHER	IA 51462 OCCUP HOUSEWIFE AGGREGATE Y-T-D		319.52
SIPONER FOR RE ELECTION RR 3	State Candidate's comm. not required to register as federal comm.	05-01-87	500.0
SADLER POP: ( ) PRIMARY ( ) GENERAL ( ) OTHER	IA 50430 OCCUP Committee AGGREGATE Y-T-D		500.00
SCHASGN, JOHN F. 1240 4TH ST	SELF	02-12-87 06-09-87	100.0 100.0
WEST DES MOINES POP: ( ) PRIMARY ( ) GENERAL ( ) OTHER	IA 50265 OCCUP ATTORNEY AGGREGATE Y-T-D		200.00
SUFARINGEN FOR LEGISLATURE COM 1103 S MAIN	State Candidate's comm. not required to register as federal comm.	03-13-87	300.0
SIGOURNEY POP: ( ) PRIMARY ( ) GENERAL ( ) OTHER	IA 52591 OCCUP Committee AGGREGATE Y-T-D		300.00
TERPSTRA, ALBERT H. 700 WOODLAND DR.		06-22-87	1,000.0
LYNNVILLE POP: ( ) PRIMARY ( ) GENERAL ( ) OTHER	IA 50153 OCCUP RETIRED AGGREGATE Y-T-D		1,000.00
THOMPSON, J SUP ONE CRESTWOOD CIRCLE		01-30-87	500.0
IA CITY POP: ( ) PRIMARY ( ) GENERAL ( ) OTHER	IA 52240 OCCUP HOMEMAKER AGGREGATE Y-T-D		500.00
SUBTOTAL OF RECEIPTS THIS PAGE			3,319.0

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ANY INFORMATION COPIED FROM SUCH REPORTS OR STATEMENTS MAY NOT BE SOLD OR USED BY ANY PERSON FOR THE PURPOSE OF SOLICITING CONTRIBUTIONS OF FOR COMMERCIAL PURPOSES, OTHER THAN USING THE NAME AND ADDRESS OF ANY POLITICAL COMMITTEE TO SOLICIT CONTRIBUTIONS FROM SUCH COMMITTEE.

Attachment 23  
page 4 of 5

REPUBLICAN STATE CENTRAL COMMITTEE OF IOWA

NAME, ADDRESS AND ZIP CODE EMPLOYER DATE AMT EA PC

MELOAN, RICHARD W  
612 FOREST DR 03-04-87 300.00

IOWA FALLS IA 50126  
FOR: ( ) PRIMARY ( ) GENERAL OCCUP RETIRED CONTR  
( ) OTHER AGGREGATE Y-T-D 300.00

MURPHY C PELLETI CAMPAIGN  
206 E 21ST ST State Candidate's comm.  
not required to 04-18-87 300.00  
register as federal comm.

ATLANTIC IA 50022  
FOR: ( ) PRIMARY ( ) GENERAL OCCUP Committee  
( ) OTHER AGGREGATE Y-T-D 300.00

WILLIAMS, CHURCHILL T.  
9 HILLSIDE DR W DELVIEW STATE BANK  
25 N FREDERICK 04-27-87 300.00  
DELVIEW

DELVIEW IA 50662  
FOR: ( ) PRIMARY ( ) GENERAL OCCUP BANKER, CHAIR  
( ) OTHER AGGREGATE Y-T-D 300.00

WILSON, WILLIAM P.  
908 1ST NE DELVIEW STATE BANK  
25 N FREDERICK 04-27-87 300.00  
DELVIEW

DELVIEW IA 50662  
FOR: ( ) PRIMARY ( ) GENERAL OCCUP PRESIDENT  
( ) OTHER AGGREGATE Y-T-D 300.00

WINSLOW, IRMA M.  
RR 1 03-06-87 250.00  
06-18-87 250.00

ALLERTON IA 50008  
FOR: ( ) PRIMARY ( ) GENERAL OCCUP STUDENT  
( ) OTHER AGGREGATE Y-T-D 500.00

SUBTOTAL OF RECEIPTS THIS PAGE 1,700.00

922040905439  
37754812513

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Use amount contributed for each category of the Standard Deduction Page

FORM 1	FORM 2
1	1
FORM LINE NUMBER 11c	

Any information received from each Payer and Recipient may not be used or used by any person for the purpose of obtaining contributions or for campaign purposes, other than using the name and address of any individual contributor to obtain contributions from such contributor.

NAME OF COMMITTEE In Full

Republican Party of Iowa

A. Full Name, Mailing Address and ZIP Code

Iron Sealers INC  
999 Oakridge Dr.  
Des Moines, IA 50308

Name of Employer

Date Received (m, year)  
3-13-87

Amount of Cash Received this Period  
800.00

Receipt For:  Primary  General  
 Other (specify):

Organization  
Political Action Com.  
Aggregate Year-to-Date > \$ 500.00

B. Full Name, Mailing Address and ZIP Code

Iowa State Education Association INC  
4025 Torrance Dr.  
Des Moines, IA 50312

Name of Employer

Date Received (m, year)  
2-03-87

Amount of Cash Received this Period  
1,500.00

Receipt For:  Primary  General  
 Other (specify):

Organization  
Political Action Com.  
Aggregate Year-to-Date > \$ 1,500.00

C. Full Name, Mailing Address and ZIP Code

INCEC  
Box 955  
Des Moines, IA 50304

Name of Employer

Date Received (m, year)  
5-15-87

Amount of Cash Received this Period  
1,250.00

Receipt For:  Primary  General  
 Other (specify):

Organization  
Political Action Com.  
Aggregate Year-to-Date > \$ 1,250.00

D. Full Name, Mailing Address and ZIP Code

Receipt For:  Primary  General  
 Other (specify):

Name of Employer

Date Received (m, year)

Amount of Cash Received this Period

Organization  
Aggregate Year-to-Date > \$

E. Full Name, Mailing Address and ZIP Code

Receipt For:  Primary  General  
 Other (specify):

Name of Employer

Date Received (m, year)

Amount of Cash Received this Period

Organization  
Aggregate Year-to-Date > \$

F. Full Name, Mailing Address and ZIP Code

Receipt For:  Primary  General  
 Other (specify):

Name of Employer

Date Received (m, year)

Amount of Cash Received this Period

Organization  
Aggregate Year-to-Date > \$

G. Full Name, Mailing Address and ZIP Code

Receipt For:  Primary  General  
 Other (specify):

Name of Employer

Date Received (m, year)

Amount of Cash Received this Period

Organization  
Aggregate Year-to-Date > \$

**TOTAL of Receipts This Page (amount) . . . . . 3,250.00**

**TOTAL This Period (use only the number entry) . . . . . 3,250.00**

92040905440  
37134842513



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20543

RQ-2

JAN 13 1988

Stephen W. Roberts, Treasurer  
Republican Party of Iowa  
1540 High Street  
Des Moines, IA 50309

Identification Number: C00014090

Reference: Amended Mid-Year Report (1/1/87-6/30/87, dated  
8/18/87)

Dear Mr. Roberts:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

2040903741

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. Under 11 CFR 102.5(b), organizations which are not political committees under the Act must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If your committee does not finance non-federal activity, the receipt of the referenced contribution(s) may violate the limitations and prohibitions of the Act. (2 U.S.C. §§441a(f) and 441b) If your committee engages in both federal and non-federal activity, either through a separate non-federal account, or one account that finances activity in connection with both federal and non-federal elections, your committee may be in violation of 11 CFR 102.3(a).

Please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received funds which are not permissible, the Commission recommends that you refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR 103.3(b). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either

before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 26 or 20 of the report covering the period during which they are made.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of prohibited contributions, prompt action by your committee in refunding or transferring-out the amounts will be taken into consideration.

-Schedule D of your report has failed to include certain information. Commission Regulations require the full name and mailing address of each creditor; the outstanding balance at the beginning and end of the reporting period; the amount incurred during the period; the payment made during the period; and the nature or purpose of each debt. Additionally, all debts must be reported continuously until extinguished or settled. Please amend your report by providing the nature or purpose of the debts disclosed. 11 CFR 104.11.

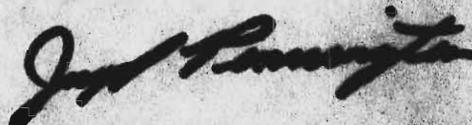
-Schedule C discloses a loan from Bankers Trust in the amount of \$50,000. In instances where the loan has endorsers or guarantors, the following information must be supplied: (1) the identification of each endorser or guarantor; and (2) the amount of endorsement or guarantee outstanding at the close of the reporting period. The term "identification" means (a) in the case of an individual, his or her full name, mailing address, occupation, and name of employer; and (b) in the case of any other person, the person's full name and address. 11 CFR 100.7(a)(1)(i)(C) and 104.3(a)(4)(iv).

-Your calculations for Lines 11 through 18 appear to be incorrect. FEC calculations disclose this amount to be \$295,396.88. Please provide the corrected total(s) on the Detailed Summary Page.

204090374.42

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact us on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Joseph Pennington  
Reports Analyst  
Reports Analysis Division

111711



## FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20543

RQ-3

February 4, 1988

Stephen W. Roberts, Treasurer  
 Republican Party of Iowa  
 1540 High Street  
 Des Moines, IA 50309

Identification Number: C00014498

Reference: Amended Mid-Year Report (1/1/87-6/30/87) dated  
 8/18/87

Dear Mr. Roberts:

This letter is to inform you that as of February 3, 1988, the Commission has not received your response to our request for additional information, dated January 13, 1988. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Joseph Pennington on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

John D. Gibson  
 Assistant Staff Director  
 Reports Analysis Division

Enclosure

3010077497



RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

00 MAR -8 AM 9:32  
Attachment 26  
page 1 of 3

March 7, 1988

Joseph Pennington  
Federal Election Commission  
999 E Street, N. W.  
Washington, D. C. 20463

Dear Mr. Pennington:

I am enclosing our January 31 year-end report as well as the amended mid-year report.

As I explained to you on the telephone, our comptroller believed he should not file a year-end report until he had straightened out the mid-year report.

I apologize for the confusion and delay. It won't happen again.

Thank you for your patience and assistance.

Sincerely,

  
Ronda L. Menke,  
Executive Director

jsc  
Enclosure

920409994AF



March 3, 1988

Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Identification Number: C00014498

Reference: Amended Mid-Year Report (1/1/87-6/30/87, dated  
8/18/87)

Ladies and Gentlemen:

In reference to your letter dated January 13, 1988, please find enclosed an amended mid-year report of receipts and disbursements for the Party's Federal activities. Also please find enclosed a photocopy of the transfer-out to the Party's non-Federal account of the total of the following contributions:

Harbor for Representative Committee	\$ 500.00
Rife for Senate Committee	300.00
Stromer for Re-election Committee	500.00
Swearingen for Representative Committee	300.00
Pellett Campaign	300.00
Iowa Realtors PAC	<u>500.00</u>
	\$2,400.00

Schedule C of the report has been amended to indicate that the \$50,000 loan from Bankers Trust Co. has no endorsers or guarantors. The nature of debts owed to the Party has been indicated on Schedule D of the amended report. Calculations for lines 11-18 on the Detailed Summary Page have also been corrected in the amended report.

Very truly yours..

  
Reginald J. Harrington  
Comptroller

Enclosures

3204070571426



Information stated from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Republican Party of Iowa

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Republican Party of Iowa State Account 521 East Locust Des Moines, IA 50309	transfer out portion of <u>John Ruan contribution</u> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-13-88 7-29-88	\$ 2,500.00 5,000.00
Republican Party of Iowa State Account 521 East Locust Des moines, IA 50309	transfer-out of Ninth Decade <u>Fund Contribution to State Account</u> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-13-88	5,000.00
Republican Party of Iowa State Account 521 East Locust Des moines, IA 50309	Transfers to State Account Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-29-88	20,000.00
44 " " " " " "	" " " " " " Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-25-88 9-06-88	25,000.00 15,000.00
90 90 40	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
920 920	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

TOTAL of Disbursements This Page (optional) .....

TOTAL This Period (last page this line number only) .....

72,500.00



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

EO-3

DEC 1 1987

Steven W. Roberts, Treasurer  
Republican Party of Iowa  
521 East Locust  
Des Moines, IA 50300

Identification Number: C00016498

Reference: Year End Report (7/1/87-12/31/87)

Dear Mr. Roberts:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report discloses receipts totalling \$5,500 from Iowa Bank PAC and National Education Association PAC (pertinent portions attached). Please clarify whether these contributions are from non-federal accounts maintained by the committee for non-federal activity. If so, be advised that such contributions are prohibited by 11 CFR 102.5(a)(1)(i) and the full amount of the contributions should be returned to the contributors or transferred-out with the donors' consent, to an account not used for federal activity. Please inform the Commission immediately in writing and provide a photocopy of the check for the transfer-out or refund. In addition, transfers-out or refunds should be disclosed on a supporting Schedule B for Line 20 of your next report and refunds should be reported on Schedule B supporting Line 26(a).

Although the Commission may take further legal action regarding the acceptance of funds from a non-federal account, your prompt transfer-out or refund of the funds in question, or clarification of the transactions, will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to

8 1 7 3 4 0 8 8 2 5 4 9 9

subject to our telephone number, (202) 476-9930. My home  
number is (202) 376-8000.

Sincerely,



Elizabeth Jones  
Reports Analyst  
Reports Analysis Division

8 2 2 0 4 8 8 2 6 5 9 4 7 5 0



**FEDERAL ELECTION COMMISSION**  
 WASHINGTON, D.C. 20543

HQ-3

December 30, 1988

**Steven W. Roberts, Treasurer**  
**Republican Party of Iowa**  
 521 East Locust  
 Des Moines, IA 50309

**Identification Number: C00024498**

**Reference: Year End Report (7/1/87-12/31/87)**

**Dear Mr. Roberts:**

This letter is to inform you that as of December 29, 1988, the Commission has not received your response to our request for additional information, dated December 7, 1988. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Elizabeth Jones on our toll-free number (800) 424-9330 or our local number (202) 376-2400.

Sincerely,

**John D. Gibson**  
 Assistant Staff Director  
 Reports Analysis Division

**Enclosure**

73433

\* TYPE RIATEJ.12

TELECON

ANALYST: ELIZABETH JONES

CONVERSATION WITH: GINA ANGELICI

COMMITTEE: REPUBLICAN PARTY OF IOWA

DATE: 10/18/89

SUBJECT(S): DECEMBER 1988 RFAI

I told Ms. Angelici that she needed to respond to the RFAI as soon as possible. She said that she had transferred the money in question sometime during 1989. She said she would send in a response by Friday.

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Any info. copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contrib. or for commercial purpose, other than using name & addr. of a political comm. to solicit from the comm.

Full Name of Committee: REPUBLICAN PARTY OF IOWA

A. Full Name, Address, Zip	Purpose of Disbursement	Date	Disburse Memo
REPUBLICAN PARTY OF IOWA-STATE ACCOUNT			
521 EAST LOCUST	TRANSFER	07/11/89	30000.00
DES MOINES, IA 50309	TRANSFER	08/15/89	15000.00
	TRANSFER	08/31/89	7000.00

(Continued)

B. Full Name, Address, Zip	Purpose of Disbursement	Date	Disburse Memo
REPUBLICAN PARTY OF IOWA-STATE ACCOUNT			
521 EAST LOCUST	TRANSFER	09/01/89	3700.00
DES MOINES, IA 50309	TRANSFER	09/05/89	2000.00
	TRANSFER	09/08/89	1500.00

(Continued)

C. Full Name, Address, Zip	Purpose of Disbursement	Date	Disburse Memo
REPUBLICAN PARTY OF IOWA-STATE ACCOUNT			
521 EAST LOCUST	TRANSFER	09/15/89	5000.00
DES MOINES, IA 50309	TRANSFER	10/02/89	16000.00
	TRANSFER	10/13/89	25000.00

(Continued)

D. Full Name, Address, Zip	Purpose of Disbursement	Date	Disburse Memo
REPUBLICAN PARTY OF IOWA-STATE ACCOUNT			
521 EAST LOCUST	TRANSFER	10/24/89	25000.00
DES MOINES, IA 50309	TRANSFER	11/09/89	50000.00
	TRANSFER	11/16/89	10000.00

(Continued)

E. Full Name, Address, Zip	Purpose of Disbursement	Date	Disburse Memo
REPUBLICAN PARTY OF IOWA-STATE ACCOUNT			
521 EAST LOCUST	TRANSFER	11/27/89	45000.00
DES MOINES, IA 50309	TRANSFER	07/31/89	30000.00

(Continued)

F. Full Name, Address, Zip	Purpose of Disbursement	Date	Disburse Memo
REPUBLICAN PARTY OF IOWA-STATE ACCOUNT			
521 EAST LOCUST	TRANSFER	08/15/89	20000.00
DES MOINES, IA 50309	* TRANSFER-IA REALTORS P/C	08/15/89	1000.00
	TRANSFER	08/24/89	11000.00

(Continued)

\* Transfer of State Committee Contribution incorrectly deposited in Federal Account - shown in previous report

SUBTOTAL of Disbursements This Page ..... 29,7200.00

TOTAL This Period .....

\* type ria9ej.12

TELECON

ANALYST: ELIZABETH JONES

CONVERSATION WITH: GINA ANGELICI

COMMITTEE: REPUBLICAN PARTY OF IOWA

DATE: 3/19/90

SUBJECT(S): REFUNDS OF QUESTIONED RECEIPTS

I told Ms. Angelici that I was looking at their reports and I couldn't find refunds for the receipts from Iowa Bank PAC or the National Education Association State Account. She said they had been made some time ago. I asked which report disclosed the refunds because I couldn't find them. She said that it would take awhile, but she would check on when the disclosure was made and call me.

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90 AUG 30 AM 11:12

FEDERAL ELECTION COMMISSION  
999 E Street, N.W.  
Washington, D.C. 20463

**SENSITIVE**

**FIRST GENERAL COUNSEL'S REPORT**

**RAD Referral #90L-16  
STAFF MEMBER Mark Allen**

**SOURCE: INTERNALLY GENERATED**

**RESPONDENT: Republican Party of Iowa and Steven Roberts, as  
treasurer**

**RELEVANT STATUTE(S):** 11 C.F.R. § 102.5(a)  
11 C.F.R. § 102.5(b)  
11 C.F.R. § 103.3(b)  
11 C.F.R. § 106.1(e)  
2 U.S.C. § 437g  
2 U.S.C. § 441a(f)  
2 U.S.C. § 441b(a)

**INTERNAL REPORTS CHECKED: Disclosure Reports**

**FEDERAL AGENCIES CHECKED: None**

**I. GENERATION OF MATTER**

This matter was referred to the Office of the General Counsel on April 2, 1990. The referral notes that the Republican Party of Iowa ("Federal Account") received loan repayments totaling \$40,000 from its non-federal account ("Non-Federal Account") during 1988. The referral also points out that in 1988 the Federal Account disclosed that although it maintains separate federal and non-federal accounts, nearly all contributions are initially deposited in the federal account. In addition, the Federal Account received excessive contributions totaling \$3,475 from an individual and contributions from seven unregistered organizations totaling \$8,600 during 1987. All of the excessive and impermissible funds were transferred out in 1988 and 1989, months

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after the date of receipt. Finally, in 1988 the Federal Account received two contributions from two apparent non-federal accounts of registered committees totaling \$5,500. No response has been received regarding these contributions.

## II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), and the accompanying regulations provide that no transfers may be made to a committee's federal account from any other account maintained by the committee for the purpose of financing activity in connection with non-federal elections. 11 C.F.R. § 102.5(a)(1)(i). The Act also provides that only contributions meeting three conditions may be deposited in a federal account: (i) they must be designated for the federal account; (ii) they must result from a solicitation which expressly states that the contribution will be used in connection with a federal election; and (iii) the contributors are informed that all contributions are subject to the prohibitions and limitations of the Act. 11 C.F.R. § 102.5(a)(2). The Act forbids committees from accepting or receiving contributions from any corporation or labor organization. 2 U.S.C. § 441b(a). No committee shall knowingly accept a multicandidate committee's or a person's contributions exceeding \$5,000 in any calendar year. 2 U.S.C. § 441a(f). Pursuant to 11 C.F.R. § 106.1(e), party committees shall allocate administrative expenses on a reasonable basis between their

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federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis.

Pursuant to 11 C.F.R. § 103.3(b)(1), contributions that present genuine questions as to whether they were made by labor organizations may be, within ten days of the treasurer's receipt, either deposited or returned to the contributor. If the former, the treasurer shall make his or her best efforts to determine the legality of the contribution. Id. If the contribution cannot be determined to be legal, the treasurer shall within 30 days refund the contribution. Id. In addition, 11 C.F.R. § 103.3(b)(3) provides that contributions which on their face exceed the Act's contribution limitations must be refunded to the contributor within 60 days of the treasurer's receipt of the contribution.

Finally, unregistered organizations can contribute to federal political committees only if the organization has (i) established a separate account which only contains those funds permitted under the Act, or (ii) demonstrated through a reasonable accounting method that the organization has received sufficient funds subject to the prohibitions and limitations of the Act. 11 C.F.R. § 102.5(b). Contributions from unregistered organizations not meeting either of these criteria or from non-federal accounts of registered committees, as well as transfers from a committee's non-federal account (see above) may include funds forbidden under the Act, such as corporate and labor organization contributions or

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excessive individual contributions.<sup>1</sup> See, e.g., 2 U.S.C. § 441a(a)(1).

A. Loan Repayments from Non-Federal Account

The Federal Account's 1987 Year-End Report disclosed a \$40,000 debt owed to the Federal Account by the Non-Federal Account (Attachment 1, page 3).<sup>2</sup> The Federal Account's 1988 April Quarterly Report disclosed a loan repayment from the Non-Federal Account dated March 11, 1988. This payment violates 11 C.F.R. § 102.5(a)(1)(i) in that the Federal Account cannot accept transfers from the Non-Federal Account. The Reports Analysis Division (RAD) sent the Federal Account Requests For Additional Information (RFAIs) and Second Notices regarding both of these disclosures. Finally, the Federal Account's 1988 July Quarterly Report reported the May 31, 1988 transfer-out of \$40,000 to the Non-Federal Account, 81 days after the transfer in. Thus, this Office recommends that the Commission find reason to believe that the Federal Account violated 11 C.F.R. § 102.5(a)(1)(i).

Iowa prohibits corporate contributions but allows labor organization contributions. This Office has obtained the Committee's state reports, which disclose no labor organization contributions. Therefore, this Office makes no recommendation regarding 2 U.S.C. § 441b(a) violations in connection with the

1. Iowa law allows unlimited individual and labor organization contributions, but does not permit corporate contributions.

2. This debt was explained on an Amended 1987 Year-End Report filed in July, 1988 as resulting from the Federal Account's payment in September, 1987 of the principal on two bank loans made to the Non-Federal Account.

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payment from the Non-Federal Account.<sup>3</sup>

**B. Allocation of Administrative Expense**

On September 7, 1988 RAD sent an RFAI to the Federal Account questioning its method of allocating administrative expenses on its 1988 July Quarterly Report (Attachment 1, page 5). Pursuant to 11 C.F.R. § 106.1(e), party committees shall allocate administrative expenses on a reasonable basis between their federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis. The Federal Account computed its allocation not by comparing its federal expenditures to the Committee's non-federal activities, but rather by taking its federal expenditures as a fraction of the Iowa Republican Committee's entire expenditures, including overhead. This method inflates the denominator and results in an artificially low allocation and thus this method may not be a "reasonable allocation method" as per § 106.1(e). A reasonable method, by contrast, would be to compute the Iowa Committee's direct support to federal candidates as a fraction of the Committee's direct support to federal and non-federal candidates. See A.O. 1982-5; 1975-21. There is a question raised as to whether the Committee used a valid

---

3. This conclusion is consistent with the Commission's previous treatment of non-federal account repayments in MUR 2536, which included a 2 U.S.C. § 441b(a) violation because the non-federal account contained corporate funds, in contrast to the present matter. Pursuant to 11 C.F.R. § 100.7(a)(1)(i)(E), a political committee under the Act may make a loan to any person. The repayment of the principal of the loan shall not be a contribution from the debtor to the lender committee; however, the repayment must be made with funds that are subject to the prohibitions of the Act. Id.

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allocation method, and so this Office recommends that the Commission find reason to believe that the Federal Account violated 11 C.F.R. § 106.1(e). See NURs 2536 and 1584. Since this allocation method may have resulted in the subsidizing of federal activity from the non-federal account, this Office also recommends that the Commission find reason to believe that the Federal Account violated 11 C.F.R. § 102.5(a).<sup>5</sup>

C. Commingling of Funds/Solicitation Violation

In October, 1988 RAD received a letter from counsel for the Republican Party of Iowa defending the allocation method used by the Federal Account. Also in that letter counsel stated that

5. The following chart shows the allocation to the federal account by the Committee's method and by the "funds expended" formula set out in A.O.s 1982-5 and 1975-21.

<u>Report</u>	<u>% by respondent's method</u>	<u>% by funds expended method</u>	<u>difference in allocable amounts</u>
Jul 88 Qtr	0.7	1.6	\$ 2,628
Oct 88 Qtr	13.0	26.4	76,590
Pre-Gen	8.0	16.9	60,401
Post-Gen	21.9	32.4	53,841
88 Yr End	10.35	15.9	32,435
89 Mid Yr	0.74	2.6	5,782
89 Yr End	2.0	6.3	26,806
		<u>total</u>	<u>\$258,483</u>

The total difference for the years 1988-89 in allocated administrative expenses between the Committee's method and the funds expended method is \$258,483. By the latter method, this sum should have been paid by the federal account for its share of the Committee's administrative expenses; instead, the non-federal account paid this amount, in effect subsidizing activities that influenced federal elections. Some of these funds may have been impermissible under the Act.

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nearly all contributions [received by the State Party] are deposited originally in the federal account. From that account expenditures are made in connection with federal activity and some state activity, while the bulk of the funds in the federal account are transferred to the state account for spending from that account.

In December, 1988, RAD sent an RFAI to the Federal Account stating that its practice of initially depositing almost all contributions in the federal account did not appear to comply with the provisions of 11 C.F.R. § 102.5(a)(2)(i) through (iii) (Attachment 1, page 5). The Federal Account's response stated that it is "fully aware of the requirements of the law" and that the Federal Account deposits ". . . only those funds into the federal account which result from a solicitation which expressly states that the contribution will be used in connection with the federal election." The response further stated that all fundraising solicitations of the Federal Account request the contributor's occupation, name of employer, and place of business. By the Federal Account's response to the RFAI, therefore, it apparently complied with the Act regarding solicitations of contributions. Therefore, this Office makes no recommendation on this issue.

D. Excessive Individual Contributions

The Federal Account's 1987 Year End Report disclosed three contributions from an individual totaling \$8,475 (Attachment 1, page 6). The contributions were received between September 6 and September 16, 1987. This sum exceeds by \$3,475 the limit set out in 2 U.S.C. § 441a(a)(1)(C). The Federal Account did not transfer out this excess to the Non-Federal Account until June 8, 1988,

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long after the the 60-day period set out in 11 C.F.R. § 103.3(b)(3). Thus, this Office recommends that the Commission find reason to believe that the Federal Account violated 2 U.S.C. § 441a(f) by accepting an excessive contribution.

**E. Contributions from Unregistered Organizations and From Non-Federal Accounts of Registered Committees**

The Federal Account's amended 1987 Mid Year report disclosed six contributions from unregistered organizations totaling \$2,400 (Attachment 1, page 6). These contributions were received between February 9 and May 1, 1987 and ranged in amount from \$300 to \$500. The Federal Account did not transfer out this \$2,400 to the Non-Federal Account until March 1, 1988, long beyond the 60 day period set out in 11 C.F.R. § 103.3(b)(3). In addition, the Federal Account's 1987 Year End Report disclosed \$6,000 in contributions dated July 28 and September 15, 1987 from two unregistered organizations (Attachment 1, pages 6-7). The Federal Account transferred out \$5,000 to the Non-Federal Account on July 13, 1988, and the other \$1,000 on August 15, 1989, both long after the 60-day period. Finally, the Federal Account's 1987 Year End Report also disclosed two other contributions from unregistered organizations, totaling \$200, that were received August 17 and September 16, 1987. The Federal Account did not transfer out this \$200 until March 4, 1988, long after the 60-day period.

In addition to the above-noted contributions, the Federal

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Account's 1987 Year End Report disclosed contributions totaling \$5500 from two apparent non-federal accounts of registered committees, received on September 8 and December 7, 1987 (Attachment 1, pages 6-7). The comptroller of the Federal Account stated to RAD in October, 1989 and again on March 19, 1990 that the impermissible funds had been transferred out of the federal account during 1989. The RAD analyst could not find the disclosure of the refunds on any report, and the comptroller has not contacted RAD about the dates of the refunds. No refund appears on the Federal Account's 1990 April or July Quarterly Reports.

The Federal Account thus received a total of \$8600 in contributions from unregistered organizations and \$5500 from non-federal accounts of registered committees, none of which was transferred out in a timely manner. The latter, in fact, may not have been transferred out at all. Because these contributions may have included funds impermissible under the Act such as labor organization contributions, this Office recommends that the Commission find reason to believe that the Federal Account violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a).

III. AUDIT

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Among the issues involved, this Office's investigation of the excessive individual contribution and the illegal transfer from the Non-Federal Account to the Federal Account may require more information but do not appear to require a field audit. The other areas, however, the basis of allocation of administrative costs, and those costs themselves, are unclear. A full audit may be necessary because of the Iowa Committee's possible funding of federal activity from sources not regulated by the Act. This Office will first, however, investigate via interrogatories and document requests, and may later recommend an audit based upon the findings of the investigation.

IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Republican Party of Iowa, Federal Account/Non-Federal Account and Steven Roberts, as treasurer, violated 2 U.S.C. §§ 441a(f) and 441b(a), and 11 C.F.R. §§ 102.5(a) and 106.1(e).
3. Approve the attached Factual and Legal Analysis and the appropriate letter.

Lawrence M. Noble  
General Counsel

8/28/90  
Date

BY:   
Lois G. Lerner  
Associate General Counsel

Attachments:

1. Referral Materials
2. Factual and Legal Analysis

22040905464



FEDERAL ELECTION COMMISSION  
WASHINGTON D C 20461

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/DELORES HARRIS  
COMMISSION SECRETARY *DH*

DATE: SEPTEMBER 12, 1990

SUBJECT: RAD REFERRAL 90L-16 - FIRST GENERAL COUNSEL'S REPORT  
DATED AUGUST 29, 1990

The above-captioned document was circulated to the Commission on Thursday, August 30, 1990 at 4:00 p.m.

Objection(s) have been received from the Commissioner(s) as indicated by the name(s) checked below:

7

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	XXX _____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Thomas	XXX _____

This matter will be placed on the meeting agenda for TUESDAY, SEPTEMBER 18, 1990.

Please notify us who will represent your Division before the Commission on this matter.

92040905465





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 1, 1990

Steven Roberts, Treasurer  
Republican Party of Iowa  
(Federal Account/Non-Federal Account)  
521 East Locust  
Des Moines, IA 50309

RE: MUR 3127

Dear Mr. Roberts:

On September 20, 1990, the Federal Election Commission found that there is reason to believe the Republican Party of Iowa ("Committee") and you, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 106.1(e), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") and the accompanying regulations. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office along with answers to the enclosed questions within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

92040905467

Steven Roberts  
Page 2

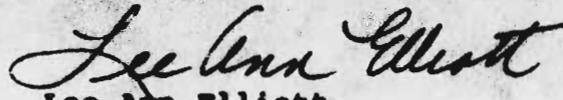
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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

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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Mark Allen, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

  
Lee Ann Elliott  
Chairman

Enclosures  
Factual and Legal Analysis  
Procedures  
Designation of Counsel Form  
Questions

92040905468

**FEDERAL ELECTION COMMISSION**

**FACTUAL AND LEGAL ANALYSIS**

**Respondents:** Republican Party of Iowa (Federal Account/Non-Federal Account) and Steven Roberts, as treasurer

**MUR 3127**

In the ordinary course of carrying out its supervisory responsibilities, the Federal Election Commission ("Commission") has discovered that the Republican Party of Iowa and Steven Roberts, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). The Commission questions the Iowa Party's allocation method used during 1988-1989. In addition, the Federal Account received excessive contributions totaling \$3,475 from an individual during September, 1987. The excessive funds were not transferred out until June, 1988.

The Act and the accompanying regulations provide that party committees shall allocate administrative expenses on a reasonable basis between their federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis. 11 C.F.R. § 106.1(e). Pursuant to 2 U.S.C. § 441a(f), no committee shall knowingly accept a multicandidate committee's or a person's contributions exceeding \$5,000 in any calendar year. In addition, 11 C.F.R. § 103.3(b)(3) provides that contributions which on their face exceed the Act's contribution limitations must be refunded to the contributor within 60 days of the treasurer's receipt of the contribution.

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**A. Allocation of Administrative Expense**

On September 7, 1988 the Reports Analysis Division sent an RFAI to the Federal Account questioning its method of allocating administrative expenses on its 1988 July Quarterly Report. Pursuant to 11 C.F.R. § 106.1(e), party committees shall allocate administrative expenses on a reasonable basis between their federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis. The Federal Account computed its allocation not by comparing its federal expenditures to the Committee's non-federal activities, but rather by taking its federal expenditures as a fraction of the Iowa Republican Committee's entire expenditures, including overhead. This method inflates the denominator and results in an artificially low allocation and thus this method may not be a "reasonable allocation method" as per § 106.1(e). A reasonable method, by contrast, would be to compute the Iowa Committee's direct support to federal candidates as a fraction of the Committee's direct support to federal and non-federal candidates. See Advisory Opinion 1982-5; 1975-21. There is a question raised as to whether the Committee used a valid allocation method, and so there is reason to believe that the Federal Account may have violated 11 C.F.R. § 106.1(e). See

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MURs 2536 and 1584.<sup>1</sup>

B. Excessive Individual Contributions

The Federal Account's 1987 Year End Report disclosed three contributions from an individual totaling \$8,475. The contributions were received between September 6 and September 16, 1987. This sum exceeds by \$3,475 the limit set out in 2 U.S.C. § 441a(a)(1)(C). The Federal Account did not transfer out this excess to the Non-Federal Account until June 8, 1988, long after the the 60-day period set out in 11 C.F.R. § 103.3(b)(3). Thus, there is reason to believe that the Federal Account violated 2 U.S.C. § 441a(f) by accepting an excessive contribution.

Therefore, there is reason to believe that the Republican Party of Iowa (Federal Account/Non-Federal Account) and Steven Roberts, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 106.1(e).

1. The following chart shows the allocation to the federal account by the Committee's method and by the "funds expended" formula set out in Advisory Opinions 1982-5 and 1975-21.

<u>Report</u>	<u>% by respondent's method</u>	<u>% by funds expended method</u>	<u>difference in allocable amounts</u>
Jul 88 Qtr	0.7	1.6	\$ 2,628
Oct 88 Qtr	13.0	26.4	76,590
Pre-General	8.0	16.9	60,401
Post-General	21.9	32.4	53,841
88 Year End	10.35	15.9	32,435
89 Mid Year	0.74	2.6	5,782
89 Year End	2.0	6.3	26,806
		<u>total</u>	<u>\$258,483</u>

The total difference for the years 1988-89 in allocated administrative expenses between the Committee's method and the funds expended method is \$258,483. By the latter method, this sum should have been paid by the federal account for its share of the Committee's administrative expenses; instead, the non-federal account paid this amount, in effect subsidizing activities that influenced federal elections.

92040905471

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)  
)  
)

MUR 3127

**INTERROGATORIES AND REQUEST  
FOR PRODUCTION OF DOCUMENTS**

**TO: Steven Roberts, Treasurer  
Republican Party of Iowa  
521 East Locust  
Des Moines, IA 50309**

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

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INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1, 1988 to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

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DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

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**QUESTIONS AND DOCUMENT REQUESTS**

Regarding the Iowa Republican Party's computation of its allocation for federal activity as provided in each of its 1988-1989 federal disclosure reports:

1. List the categories of expenses that constitute "Total expenses."
2. Identify in detail the types of expenses that constitute "Total expenses for federal activity."
3. Identify in detail the types of expenses that constitute "Total administrative expenses."
4. Provide copies of the journals, ledgers, worksheets, and other documents demonstrating the derivation of the "Total expenses," "Total expenses for federal activity," and "Total administrative expenses" figures.

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**McDONALD, BROWN & KIMPLE**

RECEIVED  
FEDERAL ELECTION COMMISSION  
SECRETARIAT

ATTORNEYS AT LAW  
502 - 18TH STREET  
P.O. BOX 250

90 OCT 29 PM 2:47

DALLAS CENTER, IOWA 50063-0250

GUY H. HALL (1888-1984)  
JOHN C. McDONALD  
RALPH R. BROWN  
JONATHAN M. KIMPLE  
CHARLES H. FASEN

October 23, 1990

FACSIMILE  
(515) 992-3871  
TELEPHONE  
(515) 992-3728

90 OCT 29 PM 3:40

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL

Ms. Lee Ann Elliott  
Chairman  
Federal Election Commission  
Washington, D.C. 20463

RE: Republican Party of Iowa  
MUR 3127

Dear Ms. Elliott:

As General Counsel of the Republican Party of Iowa, your letter of October 1, 1990, has been handed to me for response. Enclosed is the appropriate Statement of Designation of Counsel signed by Stephen W. Roberts, the Treasurer.

As you might expect, your correspondence could not have arrived at a worse time for a lawyer who serves as Counsel to the Republican Party of Iowa and Iowans for Tauke, the campaign committee for our candidate for United States Senate. Since your letter arrived on October 5, 1990, my time has been spent in reviewing two separate Federal Election Commission reports for each of the two committees. Further, I am spending half of my time at the Tauke campaign office, so it has been difficult to find time to respond to your important communication.

We respectfully request because of the urgency of dealing with current election-year filing requirements, that we be granted until November 20, 1990, in which to make a full and complete response to your letter.

I might note that I am most concerned with the questions raised in your letter regarding the allocation of administration expenses between the federal and non-federal accounts. Some two years ago I had a running exchange of telephone conversations and correspondence with Elizabeth Jones and Lisa Stolaruk regarding this very matter. Specifically, I enclose a copy of my letter of October 20, 1988, to Ms. Jones. She then responded on December 7, 1988, raising entirely different questions, and I made further responses on January 17, 1989.

92040905476

Ms. Lee Ann Elliott  
RE: Republican Party of Iowa  
October 23, 1990  
Page Two

Enclosed are copies of that correspondence beginning with the original letters from Ms. Jones dated September 7, 1988.

I have a specific recollection of visiting by telephone with Ms. Jones following our exchange of correspondence in which she noted that because the Commission was in the process of proposing revised regulations on the computation of the allocation, that we needed take no further action on what we had been doing.

As soon as new regulations came into effect, the Republican Party of Iowa then immediately complied with those regulations and has been doing so in its reports.

Further, I might specifically note that if you will review our reports during the period of your inquiry (1988-1989) you will note that substantial sums of money are transferred from the federal account to the state account. It is a simple matter, and certainly can be done, to categorize those transfers as the required allocation.

While we will be providing a full and complete response to the inquiries set forth in your letter of October 1, 1990, I thought it would be helpful at this time for you to have the foregoing information, and for you to know that we certainly have given consideration to the inquiry.

We look forward to hearing from you and trust that we will be permitted until November 20, 1990, in which to make a complete response.

Very truly yours,



Ralph R. Brown

RRB:sp

enclosures

pc: Republican Party of Iowa

92040905477

**STATEMENT OF DESIGNATION OF COUNSEL**

**NR** 3127  
**NAME OF COUNSEL:** Ralph R. Brown  
**ADDRESS:** P.O. Box 250  
Dallas Center, Iowa 50063  
**TELEPHONE:** (515) 992-3728

The above-named individual is hereby designated as my  
counsel and is authorized to receive any notifications and other  
communications from the Commission and to act on my behalf before  
the Commission.

OCT. 11, 1990  
Date

  
Signature  
Stephen W. Roberts, Treasurer

**RESPONDENT'S NAME:** Republican Party of Iowa  
**ADDRESS:** 521 East Locust Street  
Des Moines, Iowa 50309  
**HOME PHONE:** \_\_\_\_\_  
**BUSINESS PHONE:** (515) 282-8105

92040905478



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Stephen W. Roberts, Treasurer  
Republican Party of Iowa  
521 East Locust  
Des Moines, IA 50309

SEP 7 1988

Identification Number: C00014498

Reference: July Quarterly Report (4/1/88-6/30/88)

Dear Mr. Roberts:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Under 11 CFR 106.1(e), "party committees and other political committees which have established Federal campaign committees pursuant to 11 CFR 102.5 shall allocate administrative expenses on a reasonable basis between their Federal and non-Federal accounts in proportion to the amount of funds expended on Federal and non-Federal elections, or on another reasonable basis."

It appears from the "Computation of Allocation For Federal Activity" attached to your July Quarterly Report that the allocation for the Federal portion of the administrative expenses was based solely on direct contributions to Federal candidates, while the allocation for the non-Federal portion of said expenses was based on all expenditures for non-Federal activity. A reasonable method of allocating administrative expenses is to consider direct contributions to Federal candidates versus direct contributions to non-Federal candidates. Enclosed is Advisory Opinion 1982-5 which may assist you in recalculating the Federal share of your committee's administrative expenses.

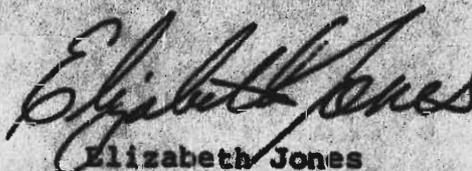
Please amend your report to reflect the additional administrative expenses incurred by your committee.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to

92040905479

contact me on our toll-free number, (800) 424-9530. My local  
number is (202) 376-2480.

Sincerely,



Elizabeth Jones  
Reports Analyst  
Reports Analysis Division

92040905460

**McDONALD, BROWN & KIMPLE**

ATTORNEYS AT LAW  
502 - 15TH STREET  
P.O. BOX 250  
DALLAS CENTER, IOWA 50063-0250

October 20, 1988

GUY H. HALL (1882-1964)

JOHN C. McDONALD  
RALPH R. BROWN  
JONATHAN M. KIMPLE  
CHARLES H. FAGEN

TELEPHONE  
(515) 982-3728

Ms. Elizabeth Jones  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

RE: Republican Party of Iowa  
Identification No.: C00014498

Dear Ms. Jones:

Following telephone conversations with you and Lisa Stolaruk, and at the request of Ms. Stolaruk, please consider this letter as a response to your letter directed to the Republican Party of Iowa dated September 7, 1988.

While your letter did not specifically indicate that an error was made in the Party's reporting of the allocation of administrative expenses, it did question the method we have used.

For reference purposes, and marked Attachment "1", I enclose a copy of our computation of allocation for federal activity for the report covering the period ending June 30, 1988. Further, marked Attachment "2", I enclose a copy of a similar computation attached to our report for the period ending September 30, 1980.

Attachment "2" represents the format attached to our reports during campaign years 1976, 1978, and 1980 ... while Attachment "1" reflects the attachments to reports in campaign years 1982, 1984, 1986, and 1988. In short, we have been utilizing the identical method since 1976. I know, because as executive director of the Republican Party of Iowa in 1976, I drafted the narrative attachment as represented by Attachment "2".

The format was changed following an audit by the Federal Election Commission in which the Commissioner recommended that instead of maintaining one account for both federal and state activity, that the Party maintain two separate accounts. Generally speaking, nearly all contributions are deposited originally in the federal

**COPY**  
**FOR YOUR FILES**  
McDONALD, BROWN & KIMPLE

92040905481

Ms. Elizabeth Jones  
RE: Republican Party of Iowa  
October 20, 1988  
Page 2

account. From that account expenditures are made in connection with federal activity and some state activity, while the bulk of the funds in the federal account are transferred to the state account for spending from that account.

We are very familiar with 11 CFR §106.1(e) which provides that Party committees which have established federal campaign committees:

"shall allocate administrative expenses on a reasonable basis between their federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis."

We feel that we have allocated administrative expenses in proportion to the amount of funds expended on federal and non-federal elections.

We first show total expenses of the Republican Party of Iowa ... followed by expenses for federal activity only. We then apply the percent of our total expenses for federal activity against our total administrative expenses. This results in the determination of an allocation.

There was some question on your part that our allocation through June 30, 1988, seemed to be a small amount.

By now, our September quarterly report has been filed, and you will note that our total expenses for federal activity for the year has increased from \$4,000 to \$56,342.42 and our allocation has risen from \$2,214.69 to \$22,862.79.

We believe that we are following the requirement of the Commission's current regulations ... although we understand on September 22, 1988, the Commission issued a Notice seeking comments on possible revisions to the rules relating to allocation.

The Republican Party of Iowa stands ready to fully comply with any and all requirements. If, upon review, you have authority to demonstrate that our current method of allocation is incorrect, we will be more than happy to follow your direction. Our September quarterly report showed that we already had paid \$75,000 from the federal account to the state account for the allocation, which leaves us a credit of \$52,137.21 for computations following October 1, 1988.

92040905482

Ms. Elizabeth Jones  
RE: Republican Party of Iowa  
October 20, 1988  
Page 3

Obviously if the Commission amends the regulation we will follow any new regulations to the best of our ability.

We look forward to your response in order that we may know whether further action is required or not.

Very truly yours,

  
Ralph R. Brown  
General Counsel,  
Republican Party of Iowa

RRB:sp

pc: Gina Angelici  
Assistant Treasurer  
Republican Party of Iowa

92040905483

COMPUTATION OF ALLOCATION FOR FEDERAL ACTIVITY

July Quarter Report (April 1, 1988 to June 30, 1988)

1. Total expenses year-to-date	<u>\$546,573.24</u>
2. Total expenses for Federal activity year-to-date	<u>4,000.00</u>
3. Percent of expenses for Federal activity	<u>0.7%</u>
4. Total administrative expenses	<u>302,636.01</u>
5. Multiply administrative expenses by % of factor	<u>2,214.69</u>
6. Allocation year-to-date	<u>2,214.69</u>
7. Less allocation paid to date	<u>15,000.00</u>
8. Total due this reporting period	<u>(\$11,973.64)</u>

92040905484



# REPUBLICAN STATE CENTRAL COMMITTEE OF IOWA

1540 HIGH STREET DES MOINES, IOWA 50309 (515) 282-8105

STEPHEN W. ROBERTS, Chairman  
DIANA STADTMUELLER, Co-Chairman  
TIMOTHY N. HYDE, Executive Director

October 15, 1980

The expenditures on Schedule F are those which, under 14 U.S.C. 441a (d) (3), the Republican State Central Committee of Iowa is allowed to make expenditures totaling \$14,720 in connection with each of Iowa's six congressional campaigns, and \$61,235.20 for the U. S. Senate races.

Under regulation section 102.6 the Republican State Central Committee of Iowa files as this federal report both federal and non-federal activities. Since the Committee's activity in federal elections is limited, the bulk of this report relates solely to the Committee's state and local activities.

Under section 56.18 et seq. of the Code of Iowa, the Republican State Central Committee receives income tax checkoff proceeds from the Iowa income tax. Between December 1, 1978, and September 30, 1980, a total of \$209,704.50 was received from the State Comptroller in income tax checkoff proceeds. These funds are maintained in a separate checking account as required by state law.

Contributions to each of our federal candidates (not to exceed \$5,000) and expenditures on behalf of each federal candidate are made only from this account. No other state party funds are used in connection with the federal elections. Accordingly, it has not been necessary to solicit funds (Reg. sec. 102.6 (b)) with an express statement that the contribution will be used for federal elections.

From January 1, 1980, to September 30, 1980, this report indicates total expenditures by the Republican State Central Committee of Iowa in the amount of \$644,703.37. During this period, \$5,000 has been contributed to federal candidates, and \$29,448.56 has been expended on behalf of federal campaigns.

Under regulation section 106.1 (e), we are required to allocate administrative expenses on a reasonable basis between our federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis.

Accordingly, since 18.71 percent of our expenditures between January 1, 1980 and September 30, 1980, have been in connection with the federal election, we are allocating 19.71 percent of our remaining administrative expenses as required. Administrative expenses during this period total \$253,795.56--so the allocation is \$47,485.15, all of which has been paid from the income tax checkoff account which is solely used for federal expenditures.

92040905485

COMPUTATION OF ALLOCATION FOR FEDERAL ACTIVITY

1. Total expenses year-to-date
2. Total expenses for Federal activity year-to-date
3. Percent of expenses for Federal activity
4. Total administrative expenses
5. Multiply administrative expenses by % of factor
6. Allocation year-to-date
7. Less allocation paid to date
8. Total due this reporting period

13,000.00  
7,000.00  
7.00%  
7,000.00  
14,000.00  
7,000.00  
7,000.00  
7,000.00

92040905486

12-31-86

COMPUTATION OF ALLOCATION FOR FEDERAL ACTIVITY

1. Total expenses year-to-date	<u>1,248,007.58</u>
2. Total expenses for Federal activity year-to-date	<u>9863<sup>2.17</sup></u>
3. Percent of expenses for Federal activity	<u>7.90%</u>
4. Total administrative expenses	<u>403,092.21</u>
5. Multiply administrative expenses by % of factor	<u>31,844.34</u>
6. Allocation year-to-date	<u>31,844.34</u>
7. Less allocation paid to date	<u>36,384.00</u>
8. Total due this reporting period	<u>-0-</u>

92040905487

11-24-86

P1

COMPUTATION OF ALLOCATION FOR FEDERAL ACTIVITY

1. Total expenses year-to-date	(P2)	<u>1,019,115.02</u>
2. Total expenses for Federal activity year-to-date		<u>71,049.18</u>
3. Percent of expenses for Federal activity		<u>6.97%</u>
4. Total administrative expenses +	(P3)	<u>275,127.00</u>
5. Multiply administrative expenses by % of factor		<u>17,584.00</u>
6. Allocation year-to-date		<u>27,584.18</u>
7. Less allocation paid to date		<u>15,712.42</u>
8. Total due this reporting period		<u>12,711.60</u>

92040905488

7-15-83

COMPUTATION OF ALLOCATION FOR FEDERAL ACTIVITY

1. Total expenses year-to-date	<u>935,200<sup>03</sup></u>
2. Total expenses for Federal activity year-to-date	<u>37,427<sup>58</sup></u> -
3. Percent of expenses for Federal activity	<u>4.00%</u>
4. Total administrative expenses	<u>392,604<sup>85</sup></u>
5. Multiply administrative expenses by % of factor	<u>15,712<sup>40</sup></u>
6. Allocation year-to-date	<u>15,712<sup>40</sup></u>
7. Less allocation <del>PAYD</del> to date (TRANSFERRED 7-18 + 8-6)	<u>15,000</u> -
8. Total due this reporting period	<u>712<sup>40</sup></u> -
	<u>7,000</u> -

92040905489

9-30-86

COMPUTATION OF ALLOCATION FOR FEDERAL ACTIVITY

1. Total expenses year-to-date	379,121.46
2. Total expenses for Federal activity year-to-date	0
3. Percent of expenses for Federal activity	0
4. Total administrative expenses	254,074.31
5. Multiply administrative expenses by 2 of factor	0
6. Allocation year-to-date	0
7. Less allocation computed to date	0
8. Total due this reporting period	0

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6-30-86



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

NOV 7 1988

Steven W. Roberts, Treasurer  
Republican Party of Iowa  
521 East Locust  
Des Moines, IA 50309

Identification Number: C00014498

Reference: Amended July Quarterly Report (4/1/88-6/30/88 - dated  
10/20/88)

Dear Mr. Roberts:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-In a letter dated October 20, 1988, your committee explained that "...nearly all contributions are deposited in the federal account. From that account expenditures are made in connection with federal activity and some state activity, while the bulk of the funds in the federal account are transferred to the state account for spending from that account."

It appears that your committee maintains one account for federal activity and a separate account for non-federal activity. While this type of arrangement is provided for under the current regulations (see 11 CFR 102.5(a)(1)(i)), there are certain restrictions on the funds that may be deposited into the federal account. Specifically, only contributions meeting the following conditions may be deposited into the federal account: 1) Contributions designated for the federal account; 2) contributions that result from a solicitation which expressly states that the contribution will be used in connection with a federal election; and 3) contributions from contributors who are informed that all contributions are subject to the prohibitions and limitations of the Act. See 11 CFR 102.5(a)(2)(i) through (iii).

Your committee's practice of initially depositing almost all contributions in the federal account does not appear to comply with the provisions of 11 CFR 102.5(a)(2)(i) through (iii), as described above.

92040905491

Please provide an explanation or further clarification regarding the money deposited into your federal account.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Elizabeth Jones  
Reports Analyst  
Reports Analysis Division

92040905492



FEDERAL ELECTION COMMISSION

RQ-3

WASHINGTON, D.C. 20463

December 30, 1988

Steven W. Roberts, Treasurer  
Republican Party of Iowa  
521 East Locust  
Des Moines, IA 50309

Identification Number: C00014498

Reference: Amended July Quarterly Report (4/1/88-6/30/88) dated  
10/20/88

Dear Mr. Roberts:

On December 7, 1988 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your December 12, 1988 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-In a letter dated October 20, 1988, your committee explained that "...nearly all contributions are deposited in the federal account. From that account expenditures are made in connection with federal activity and some state activity, while the bulk of the funds in the federal account are transferred to the state account for spending from that account."

It appears that your committee maintains one account for federal activity and a separate account for non-federal activity. While this type of arrangement is provided for under the current regulations (see 11 CFR 102.5(a)(1)(i)), there are certain restrictions on the funds that may be deposited into the federal account. Specifically, only contributions meeting the following conditions may be deposited into the federal account: 1) Contributions designated for the federal account; 2) contributions that result from a solicitation which expressly states that the contribution will be used in connection with a federal election; and 3) contributions from contributors who are informed that all contributions are subject to the prohibitions and limitations of the Act. See 11 CFR 102.5(a)(20(i) through (iii).

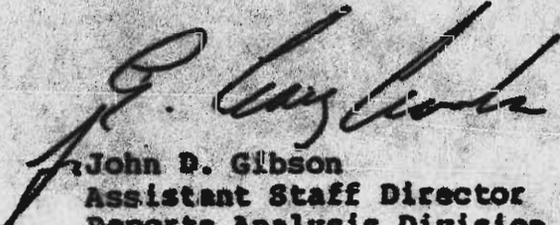
92040905493

Your committee's practice of initially depositing almost all contributions in the federal account does not appear to comply with the provisions of 11 CFR 102.5(a)(2)(i) through (iii), as described above. Please provide an explanation or further clarification regarding the money deposited into your federal account.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Elizabeth Jones on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,



John B. Gibson  
Assistant Staff Director  
Reports Analysis Division

92040905494

**McDONALD, BROWN & KIMPLE**

ATTORNEYS AT LAW

502 - 15TH STREET

P.O. BOX 250

DALLAS CENTER, IOWA 50063-0250

January 17, 1989

TELEPHONE  
(515) 982-3728

GUY H. HALL (1882-1964)

JOHN C. McDONALD

RALPH R. BROWN

JONATHAN B. KIMPLE

CHARLES H. FAGEN

Ms. Elizabeth Jones  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

RE: Republican Party of Iowa  
Identification No. C00014498

Dear Ms. Jones:

On December 7, 1988, you wrote to the Treasurer of the Republican Party of Iowa regarding our amended July Quarterly Report dated October 20, 1988.

Your letter raised questions regarding my letter to you of October 20, 1988.

Additionally, John D. Gibson wrote a subsequent letter to Mr. Roberts on December 30, 1988, suggesting that our December 12, 1988, response was incomplete with respect to your letter of December 7. In fact, what Mr. Gibson referred to as the December 12 response was simply an amendment which was mailed before your letter of December 7 even arrived.

Please forgive the delay in responding to both letters ... but since you failed to correspond directly with me following my October 20, 1988, letter, copies of correspondence have been required to be forwarded to me.

Your letter raised questions about the Republican Party of Iowa's maintaining one account for federal activity and a separate account for non-federal activity. I might mention for the record that following the initial adoption of a Federal Election Campaign Act of 1971, the Republican Party of Iowa maintained only one account. We were directed by the Federal Election Commission following an audit several years ago to establish two accounts. Were it not for that direction by the Federal Election Commission we would continue to maintain one account.

92040905495

**COPIES**  
**FOR YOUR FILES**  
McDONALD, BROWN & KIMPLE, L.L.P.

Ms. Elizabeth Jones  
Federal Election Commission  
January 17, 1989  
Page 2

You cite the requirements of 11 CFR 102.5(a)(2)(i) through (iii) relating to the restrictions on funds that may be deposited in this federal account.

Let me assure you, Ms. Jones, that we are fully aware of the requirements of the law ... fully comply with the law ... and deposit only those funds into the federal account which result from a solicitation which expressly states that the contribution will be used in connection with the federal election.

All fundraising solicitations of the Republican Party of Iowa contain the following language:

The Federal Election Commission requires us to request the following:

OCCUPATION \_\_\_\_\_

NAME OF EMPLOYER \_\_\_\_\_

PLACE OF BUSINESS \_\_\_\_\_

Several years ago we were advised by Mark Braden, Counsel of the Republican National Committee, that this language would meet the requirement of the regulations.

It is most surprising that your letter of December 7 would state:

"Your committee's practice of initially depositing almost all contributions in the federal account does not appear to comply with the provisions of 11 CFR 102.5(a)(2)(i) through (iii), as described above."

I am stunned that you would make such an unfounded allegation, because we do comply with the regulations.

I might note, however, that there was only one exception. All proceeds received from the State of Iowa income tax check-off are deposited in the federal account. This was fully disclosed to the Commission in Advisory Opinion Request 1978-9 and addressed by the Commission in Advisory Opinion 1978-9 dated July 21, 1978.

92040905496

Ms. Elizabeth Jones  
Federal Election Commission  
January 17, 1989  
Page 3

I trust the foregoing will be fully responsive to your letter of  
December 7, 1988.

Very truly yours,

  
Ralph R. Brown  
General Counsel,  
Republican Party of Iowa

RRB:sp

pc: John D. Gibson  
Gina Angelici ✓

92040905497



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 1, 1990

Ralph R. Brown, Esq.  
McDonald, Brown & Kimple  
502 15th Street  
P.O. Box 250  
Dallas Center, Iowa 50063

RE: MUR 3127  
Republican Party of Iowa

Dear Mr. Brown:

This is in response to your letter dated October 23, 1990, which we received on October 29, 1990, requesting an extension until November 20 to respond to the Commission's Notification letter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on November 20, 1990.

If you have any questions, please contact Mark Allen, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

*Jonathan Bernstein by NA*

BY: Jonathan Bernstein  
Assistant General Counsel

92040905498

06C 8736

# McDONALD, BROWN & KIMPLE

ATTORNEYS AT LAW  
502 - 15TH STREET  
P.O. BOX 250  
DALLAS CENTER, IOWA 50083-0250

90 NOV 26 AM 10:25

GUY H. HALL (1882-1984)

JOHN C. McDONALD  
RALPH R. BROWN  
JONATHAN M. KIMPLE  
CHARLES H. FAGEN

November 20, 1990

FACSIMILE  
(515) 982-3871  
TELEPHONE  
(515) 982-3728

Mr. Lawrence M. Noble  
General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

RE: Republican Party of Iowa  
MUR 3127

Dear Mr. Noble:

In response to Chairman Elliott's letter of October 1, 1990,  
enclosed please find the following:

1. Response to Interrogatories and Request for Production of Documents.
2. Request for Pre-Probable Cause Conciliation on Issue of an Excessive Individual Contribution.
3. Resistance and Denial to Finding that There is Reason to Believe the Committee Violated Regulations Governing the Allocation of Administrative Expenses.

We believe the enclosed responses reply to all inquiries raised in the letter of October 1, 1990.

If you feel additional information is required on any point, please contact me as soon as possible.

Very truly yours,



Ralph R. Brown,  
General Counsel  
Republican Party of Iowa

RRB:sp

enclosures

pc: Gina Angelici  
Stephen W. Roberts

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
90 NOV 25 PM 9:01

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
90 NOV 26 PM 1:32

92040905499

BEFORE THE FEDERAL ELECTION COMMISSION

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IN THE MATTER OF : MUR 3127  
THE REPUBLICAN PARTY OF IOWA :  
AND STEPHEN W. ROBERTS, AS : RESPONSES TO INTERROGATORIES  
TREASURER : AND REQUEST FOR PRODUCTION  
OF DOCUMENTS

---

COMES NOW Ralph R. Brown, general counsel to the Republican Party of Iowa and Stephen W. Roberts, its Treasurer, and makes the following responses to Interrogatories and Request for Production of Documents:

1. Regarding the Iowa Republican Party's computation of its allocation for federal activity as provided in each of its 1988-1989 federal disclosure reports, list the categories of expenses that constitute "Total Expenses".

RESPONSE: Attached hereto are the actual worksheets reporting by name each of the categories of expense constituting "Total Expenses" shown in all accounts of the Republican Party of Iowa for (a) calendar year 1988 and (b) calendar year 1989. Attached to each set of worksheets is shown the computation of the allocation for federal activity attached to each year-end report.

2. Identify in detail the types of expenses that constitute "Total expenses for federal activity".

9204905500

RESPONSE: Expenditures for federal activity for both 1988 and 1989 are indicated on the attached worksheets and highlighted in orange. In 1988, federal expenditures constituted the portion of the costs of the Party's voter identification and turnout program allocated to federal candidates and campaign materials produced for volunteer campaign activities on behalf of federal candidates under the Victory '88 line item. In 1989 federal activity expenses consisted of radio advertising in-kind as a primary campaign contribution of under \$5,000.00 to the United States Senate candidate, and mail prior to the primary which, in addition to the election of state candidates, sought support to assist the Party in electing federal candidates in 1990.

3. Identify in detail the types of expenses that constitute "Total Administrative Expenses".

RESPONSE: Administrative expenses for 1988 and 1989 are highlighted in green on the attached worksheets which are, it is believed, self-explanatory.

4. Provide copies of the journals, ledgers, worksheets, and other documents demonstrating the derivation of the "Total Expenses", "Total Expenses for Federal Activity", and "Total Administrative Expenses" figures.

RESPONSE: The worksheets in question, and as described above, are attached hereto.

92040905501

RP15TAK  
1/27/89

STATE REPORT (FRC)  
1/ 1/88 Through 12/31/88

Indicates Administrative Expenses  
(\$584,403.12)

Page 1 of 8

Indicates Federal Activity (\$173,490.60)

Description	Amount
<b>EXPENSES</b>	
TOTAL FEE	-946.82
TOTAL PETTY CASH	-430.00
TOTAL EXPENSES OF MOVING	1,100.25
COMMUNICATION SALARIES	
TOTAL Communications Director	-19,446.25
TOTAL COMMUNICATION SALARIES	19,446.25
TOTAL PAID MEDIA	1,379.79
INTRA-PARTY COMMUNICATION	
TOTAL GOP Brochure	-182.00
TOTAL Fair Booth	-2,297.45
TOTAL Not Categorized INTRA-PARTY COMMUNICATION	-993.09
TOTAL INTRA-PARTY COMMUNICATION	173,490.60
COMMUNICATION AIDS	
TOTAL Periodical Subscriptions	-210.35
TOTAL Not Categorized COMMUNICATION AIDS	-1,021.84
TOTAL COMMUNICATION AIDS	1,232.19
TOTAL audit fee	1,557.00
rent	
TOTAL audit fee	-240.00
TOTAL Office Cleaning	-920.00
TOTAL Not Categorized rent	-29,597.72
TOTAL rent	30,717.72
TOTAL office supplies	1,000.00

Indicates Total Expense  
(less pass through expense)

inter program

73,296.91

2 0 5 5 0 6 0 7 0 2 6

STATE REPORT (FRC)  
1/ 1/88 Through 12/31/88

RESTATE  
1/27/89

Description	Amount
TOTAL phone service	55,433.77
TOTAL postage	439,758.83
<b>ADMINISTRATION SALARIES</b>	
TOTAL Executive Director	-26,451.12
TOTAL Comptroller	-21,770.43
TOTAL Bookkeeper	-14,336.11
TOTAL Exec Secretary	-14,750.72
TOTAL Receptionist	-10,780.00
TOTAL Secretary	-6,000.65
TOTAL FICA and Federal W/N	-43,333.52
TOTAL Health Ins.	-9,759.32
TOTAL State Withholding	-6,040.93
<b>TOTAL ADMINISTRATION SALARIES</b>	254,047.28
copier maintenance agrmts	
TOTAL FICA and Federal W/N	-4,091.62
TOTAL Not Categorized copier maintenance agrmts	-1,572.40
<b>TOTAL copier maintenance agrmts</b>	2,664.10
<b>UNEMPLOYMENT INSURANCE</b>	
TOTAL Federal Unemployment	-714.99
TOTAL State Unemployment	-6,940.09
<b>TOTAL UNEMPLOYMENT INSURANCE</b>	7,655.08
TOTAL Utilities/Electricity	23,262.35
TOTAL Bank Charges	750.00
TOTAL computer bookkeeping	31,912.34

9 2 0 4 0 9 0 5 5 0 3      217,670.02

RFI STATE  
1/27/89

STATE REPORT (FEC)  
1/ 1/88 Through 12/31/88

Page 3 of 3

Description	Amount
TOTAL delivery charges	[REDACTED]
TOTAL equipment rental	[REDACTED]
TOTAL INSURANCE	[REDACTED]
Loan Interest	
TOTAL Principal on Loan	-90,000.00
TOTAL Net Categorized Loan Interest	[REDACTED]
TOTAL Loan Interest	-100,478.14
TOTAL LEGAL EXPENSES	[REDACTED]
TOTAL long distance phone	[REDACTED]
TOTAL Miscellaneous Office	[REDACTED]
ORGANIZATION SALARIES	
TOTAL Organization Director	-20,326.14
TOTAL Organization Assistant	-8,403.84
TOTAL ORGANIZATION SALARIES	[REDACTED]
TOTAL COUNTY FAIRS	2814.84
PRECINCT CAUCUS ACTIVITY	
Caucus Rite	
TOTAL 4-part Form	-1,321.68
TOTAL Caucus Rite	-1,321.68
TOTAL Caucus Colleges	-327.06
TOTAL Postage	-20.39
TOTAL Printing Pr. Caucus Mail	-348.40
TOTAL Telephone Expenses	-600.00
TOTAL Marriott Rental	-1,598.57

4 0 5 5 0 6 0 4 0 2 6

78,470.29

SP1STATE  
1/27/88

STATE REPORT (FEC)  
1/ 1/88 Through 12/31/88

Page 4 of 8

Description	Amount
TOTAL Equipment	-3,473.70
TOTAL Food For Reception	-321.50
TOTAL PRECINCT CAUCUS ACTIVITY	-8,010.39
TOTAL COUNTY CONVENTIONS	-62.40
DISTRICT CAUCUSES	
TOTAL Statutory Caucuses	-6,190.96
TOTAL General Mailings	-119.09
TOTAL DISTRICT CAUCUSES	-6,277.61
STATE CONVENTION	
TOTAL Facility Rental	-11,310.00
TOTAL Credentials	-300.14
TOTAL Platform Committee	-492.20
TOTAL Mailings	-266.30
TOTAL Other Arrangements (signs,	-4,040.94
TOTAL Printing of Mailings	-627.52
TOTAL Program	-1,033.31
TOTAL St. Conv. Miscellaneous	-449.00
TOTAL STATE CONVENTION	-20,106.17
AGENDA '88 VOTER PROGRAM	
TOTAL Training	-769.64
TOTAL Not Categorized AGENDA '88 VOTER PROGRAM	-160.22
TOTAL AGENDA '88 VOTER PROGRAM	-929.86
TOTAL Training	-2,155.60
ELECTION DAY ACTIVITIES	
TOTAL Turnout calls to Independent	-2,900.00

9 2 0 4 0 9 0 5 5 0 5

EXHIBIT  
1/27/69

STATE REPORT (FBC)  
1/ 1/68 Through 12/31/68

Page 3 of 5

Description	Amount
TOTAL Not Categorized ELECTION DAY ACTIVITIES	-45.03
TOTAL ELECTION DAY ACTIVITIES	-2,945.03
VOTER LIST MAINTENANCE	
TOTAL Handbooks	-42.34
TOTAL Voter Regs. Tape Updates	-2,344.04
TOTAL List Management	-875.83
TOTAL Reimbursable expenses	-69.60
TOTAL VOTER LIST MAINTENANCE	-3,331.81
TOTAL DATA COLLECTION-ATTENDEES	<del>47,132.00</del>
POLITICAL SALARIES	
TOTAL Political Director	-21,438.83
TOTAL Legislative Assistant	-17,580.89
TOTAL POLITICAL SALARIES	<del>390,019.72</del>
INCUMBENCY SERVICES	
TOTAL Photography	-28.91
TOTAL INCUMBENCY SERVICES	<del>428.91</del>
OPPOS RESRCH/ISSUE SVLPMT	
TOTAL Tracking Surveys	-231.88
TOTAL Press Releases/Editor Ltr	-34.10
TOTAL OPPOS RESRCH/ISSUE SVLPMT	<del>465.98</del>
CANDIDATE RECRUITMENT	
TOTAL Legislative	-698.97
TOTAL CANDIDATE RECRUITMENT	<del>698.97</del>
CANDIDATE ASSISTANCE	
TOTAL Field Staff (Sal/Exp)	-47,277.15

9 0 5 5 0 6 0 7 0 2 6

44,245.83

RESTATE  
1/27/89

STATE REPORT (FEC)  
1/ 1/88 Through 12/31/88

Page 6 of 8

Description	Amount
TOTAL Cash Assistance	-43,536.63
TOTAL Legis. Campaign Schools	-5,510.75
TOTAL County Campaign Schools	-897.00
TOTAL Candidate Bio Books	-678.02
TOTAL Staff Training	-7.50
TOTAL REIMBURSABLE POLLING TOTAL CANDIDATE ASSISTANCE	-922.27 -98,829.32
TOTAL POLITICAL DIVISION REIMBU	-3,721.76
TOTAL TRACKING SURVEYS	-19,482.41
FINANCE SALARIES	
TOTAL Finance Director	-19,610.17
TOTAL Finance Assistant	-3,903.05
TOTAL Expenses/Fees TOTAL FINANCE SALARIES	-3,835.65 -35,429.67
DIRECT MAIL	
TOTAL First Renewal	-15,216.63
TOTAL Issues Survey	-4,371.00
TOTAL Second Renewal	-6,663.35
TOTAL Third Renewal	-18,783.94
TOTAL Invitation	-1,020.60
TOTAL Telegram Invitation	-1,345.02
TOTAL grassley mailing TOTAL DIRECT MAIL	-175.00 -47,975.62
TELEMARKETING	

9 2 0 4 0 9 0 5 5 0 7

Description	Amount
TOTAL Prospecting	-14,142.78
TOTAL Lapsed Donor	-601.31
TOTAL TELEMARKETING	-14,764.09
<b>MAJOR DONOR</b>	
TOTAL Package Plan	-2,091.02
TOTAL Briefings	-14,961.00
TOTAL Tom Vance Fee	-678.20
TOTAL MAJOR DONOR	-17,720.02
<b>EVENTS</b>	
TOTAL John McDonald	-9,672.75
TOTAL Fall Dinner	-162.40
TOTAL House Parties	-120.92
TOTAL EVENTS	-9,964.07
TOTAL Caucus Book Bags	-220.00
TOTAL BACKEND FULFILLMENT	-6,710.38
TOTAL 1987 Expenses	-8,413.02
<b>SCC EXPENSES</b>	
TOTAL Member Expenses	-27,037.75
TOTAL Office Allowance-Chair	-19,333.31
TOTAL Office Allowance-Cochair	-4,791.56
TOTAL SCC Meeting Expenses	-1,343.03
TOTAL SCC EXPENSES	-52,505.65
<b>RNC EXPENSES</b>	
TOTAL National Convention	-6,479.04
TOTAL RNC Meetings	-4,477.50

RPLSTATE  
1/27/89

STATE REPORT (FSC)  
1/ 1/88 Through 12/31/88

Page 8 of 8

Description	Amount
TOTAL INC EXPENSES	510,987.34
TOTAL EXPENSES	-867,220.93
OVERALL TOTAL	-867,220.93

60550604026 92040905509 59,462.99

FEDERAL REPORT (FEC)  
1/ 1/88 Through 12/31/88

RECEIVED  
1/27/89

Description	Amount
<b>EXPENSES</b>	
TOTAL transfers	-429,141.90
TOTAL redeposits	-339.80
TOTAL BANK SERVICE CHARGES	-121.00
TOTAL BANK CHARGES	-546.41
TOTAL AGENDA '88 VOTER PROGRAM	[REDACTED] - Federal Share: [REDACTED]
TOTAL TRACKING SURVEYS	-8,013.30
TOTAL DIRECT MAIL	-2,770.00
TOTAL TELEMARKETING	-21,670.87
TOTAL VICTORY 88	[REDACTED]
<b>RNC Expenses</b>	
TOTAL RNC Meetings	-1,435.30
TOTAL RNC Expenses	[REDACTED]
TOTAL CONGRESSIONAL CONTRIBUTIO	79,064.80
TOTAL EXPENSES	-698,712.70
OVERALL TOTAL	-698,712.70

88.020.98  
92040905510

ESCROW REPORT (FNC)  
1/ 1/88 Through 12/31/88

REFRESH  
1/27/89

Description	Amount
<b>EXPENSES</b>	
TOTAL METER POSTAGE	[REDACTED]
TOTAL Office Supplies	[REDACTED]
TOTAL BANK SERVICE CHARGES	[REDACTED]
<b>ADMINISTRATION SALARIES</b>	
TOTAL FICA AND FED W/E	-2,930.22
TOTAL Health Insurance	-1,227.37
TOTAL STATE W/H TAXES	-450.97
TOTAL ADMINISTRATION SALARIES	[REDACTED]
TOTAL BANK CHARGES	[REDACTED]
TOTAL Computer bookkeeping	[REDACTED]
TOTAL Long Distance Phone	[REDACTED]
TOTAL AGENSA '88	52,762.33
TOTAL Absentee Ballot Mailing	23,272.46
<b>DIRECT MAIL</b>	
TOTAL Third Renewal	-7,630.09
TOTAL Battle Plan	-3,499.00
TOTAL Not Categorized DIRECT MAIL	-10,407.45
TOTAL DIRECT MAIL	-29,536.54
<b>TELEMARKETING</b>	
TOTAL Prospecting	-112,400.20
TOTAL Lapsed Donor	-96,840.03
TOTAL Not Categorized TELEMARKETING	-40,922.90
TOTAL TELEMARKETING	-249,932.21

30,055.09

9 2 0 4 0 9 0 5 1 1

ESCROW REPORT (FRC)  
1/ 1/88 Through 12/31/88

RP125CRW  
1/27/89

Description	Amount	
<b>MAJOR DONORS</b>		
TOTAL Briefing	-350.54	
TOTAL MAJOR DONORS		-350.54
TOTAL BACKEND FULFILLMENT		<del>-16,970.21</del>
TOTAL TRANSFERS		<del>-39,000.00</del>
TOTAL EXPENSES		-491,778.38
OVERALL TOTAL		-491,778.38

16,970.21

9 2 0 4 0 9 0 5 5 1 2

CHECK-OFF REPORT (FDC)  
1/ 1/88 Through 12/31/88

RECEIVED  
1/27/89

Description	Amount
<b>EXPENSES</b>	
Com. Div. Salary/Ins	
TOTAL Director	-1,128.00
TOTAL Com. Div. Salary/Ins	747,128.00
TOTAL Intraparty Communications	47,122.00
TOTAL COMMUNICATION AIDS	927.96
TOTAL Office/Parking Rent	20,300.00
TOTAL Office Supplies	22,639.00
TOTAL Phone Line Charges	23,592.12
TOTAL Office Postage (NO BKE)	22,450.00
NDQTRS Salaries/Insurance	
TOTAL FICA and Fed W/H	-26,642.70
TOTAL State Withholding	-8,873.41
TOTAL NDQTRS Salaries/Insurance	632,216.11
TOTAL Unemployment Insurance	7,371.60
TOTAL Utilities	21,164.03
TOTAL Bank Charges	742.00
TOTAL Computer and Skppy Exp	8,300.00
TOTAL Pitney Bowes Rental/Repai	410.00
TOTAL Legal Expenses	211.96
TOTAL Long Distance Phone Chrg	20,001.00
STATE CONVENTION	
TOTAL mailings	-37.75
TOTAL STATE CONVENTION	-37.75

62,162.43

9 2 0 4 0 9 0 5 5 1 3

521 E. Court - Des Moines, Iowa 50309 - (515) 282-9105

CHECK-OFF REPORT (FEC)  
1/1/88 Through 12/31/88

RPICKOFF  
1/27/89

Description	Amount
TOTAL AGENDA '88	-485.18
VOTER LIST MAINTENANCE	
TOTAL voter registration update	-46.88
TOTAL VOTER LIST MAINTENANCE	-46.88
TOTAL Absentee Mailing	-910.31
TOTAL candidate assistance	-1,975.00
SALARIES-FINANCE	
TOTAL Expenses/Fees	-1,742.51
TOTAL SALARIES-FINANCE	-1,742.51
TOTAL DIRECT MAIL	-18,497.12
TOTAL TELEMARKETING	-10,414.49
MAJOR DONOR	
TOTAL Package Plan	-919.01
TOTAL Briefings	-500.00
TOTAL MAJOR DONOR	-1,419.01
TOTAL BACKEND/FULFILLMENT	-1,368.60
SCC EXPENSES	
TOTAL SCC Meeting Expenses	-48.37
TOTAL SCC EXPENSES	-48.37
TOTAL EXPENSES	-96,077.26
OVERALL TOTAL	-96,077.26

48.37

9 2 0 4 0 9 0 5 5 1 4

COMPUTATION OF ALLOCATION FOR FEDERAL ACTIVITY  
Year End Report - 11/29/88 - 12/31/88

1. Total Expenses Year-to-date:	\$1,675,277.57
2. Total Expenses for Federal Activity Year-to-date:	173,490.60
3. Percent of Expenses for Federal Activity:	10.35%
4. Total Administrative expenses	584,403.12
5. Multiply Administrative Expenses by %-factor:	60,485.72
6. Allocation Year-to-date:	60,485.72
7. Less Allocation Paid-to-date:	95,000.00
8. Total Due this Reporting Period:	.\$ 0.00

92040905515

TRANSACTION REPORT BY CATEGORY  
1/ 1/89 Through 12/31/89

Federal Account #1 page 1 of 1

RPIFED  
1/31/90

Page 1

Description	Amount
<b>EXPENSES</b>	
TOTAL 1988 EXPENSES	[REDACTED]
===1989 HEADQUARTERS===	
<b>BOOKKEEPING</b>	
TOTAL Bank Charges	-25.28
TOTAL BOOKKEEPING	-25.28
<b>LOAN</b>	
TOTAL Principal	-383.62
TOTAL Interest	-1,592.83
TOTAL LOAN	-1,976.45
TOTAL Not Categorized ===1989 HEADQUARTERS===	-2,754.31
TOTAL ===1989 HEADQUARTERS===	[REDACTED]
TOTAL REINBURSABLE EXPS(1989)=	[REDACTED] less 122 refund [REDACTED]
TOTAL RETURNED CHECKS===	-2,200.00
TOTAL FEDERAL ACTIVITY	[REDACTED]
TOTAL ===TRANSFERS===	-392,900.00
TOTAL EXPENSES	-437,445.45
OVERALL TOTAL	-437,445.45

92040905516

[REDACTED] - Indicates Administrative Expenses (\$623,394.18)

[REDACTED] - Indicates Pass Throughs, Finance, and Committee Expenses

[REDACTED] - Indicates Federal Activity (\$33,046.00)

RPICKOFF  
1/31/90

Description	Amount
<b>EXPENSES</b>	
TOTAL 1988 EXPENSES	-13.99
TOTAL ===1989 COMMUNICATION===	-2,988.92
TOTAL Communication FICA	-1,211.59
<b>===1989 FINANCE===</b>	
TOTAL DIRECT MAIL	-3,401.26
TOTAL TELEMARKETING	-8,059.80
TOTAL BACKEND/FULFILLMENT	-627.92
TOTAL Not Categorized ===1989 FINANCE===	-9,061.13
TOTAL ===1989 FINANCE===	-21,150.11
<b>===1989 HEADQUARTERS===</b>	
<b>OFFICE/RENT</b>	
TOTAL Rent	-6,166.66
TOTAL Parking	-290.00
TOTAL Storage	-290.00
TOTAL Cleaning	-130.00
TOTAL OFFICE/RENT	-6,876.66
<b>BOOKKEPPING</b>	
TOTAL Bank Charges	-21.84
TOTAL BOOKKEPPING	-21.84
<b>EQUIP RENT/LEASE/PURCHASE</b>	
TOTAL Mail System	-743.00
TOTAL EQUIP RENT/LEASE/PURCHASE	-743.00
<b>OFFICE SUPPLIES</b>	

92040905517

Journal  
Account  
#2

TRANSACTION REPORT BY CATEGORY  
1/ 1/89 Through 12/31/89

RPICKOFF  
1/31/90

Description	Amount
TOTAL Paper	-932.40
TOTAL Printer Ribbons/Labels	-702.70
TOTAL OFFICE SUPPLIES	-1,635.18
TOTAL METER POSTAGE	-4,700.00
TOTAL INSURANCE	-2,761.00
UNEMPLOYMENT TAXES	
TOTAL State Unemployment	-3,077.97
TOTAL Federal Unemployment	-3,113.22
TOTAL UNEMPLOYMENT TAXES	-6,991.19
SALARIES	
TOTAL Adm. FICA	-39.77
TOTAL SALARIES	-39.77
ADMIN. PERSONNEL EXPENSES	
TOTAL Automobile (State Party)	-299.00
TOTAL ADMIN. PERSONNEL EXPENSES	-299.00
TOTAL Not Categorized ===1989 HEADQUARTERS===	-19,965.06
TOTAL ===1989 HEADQUARTERS===	-41,032.70
TOTAL Adm. FICA	-3,079.33
TOTAL ===1989 ORGANIZATION===	-1,373.44
TOTAL Organ. Div. FICA	-1,407.00
TOTAL ===1989 POLITICAL===	-1,436.43
TOTAL Political FICA	-2,742.47
TOTAL EXPENSES	-90,952.41
OVERALL TOTAL	-90,952.41

92040905518

92040905519

Description	Amount	
<b>EXPENSES</b>		
TOTAL 1988 EXPENSES		-1,978.76
===1989 COMMUNICATION===		
INTRA-PARTY COMMUNICATION		
TOTAL "Winning Edge"	-2.67	
TOTAL INTRA-PARTY COMMUNICATION		-2.67
TOTAL ===1989 COMMUNICATION===		-2.67
===1989 FINANCE===		
TOTAL TELEMARKETING	-16,898.99	
TOTAL EVENTS	-37.50	
TOTAL BACKEND/FULFILLMENT	-3,000.00	
TOTAL Not Categorized ===1989 FINANCE===	-222.94	
TOTAL ===1989 FINANCE===		-20,959.43
===1989 HEADQUARTERS===		
OFFICE/RENT		
TOTAL Parking	-240.00	
TOTAL OFFICE/RENT		-240.00
BOOKKEPPING		
TOTAL Bank Charges	-42.40	
TOTAL BOOKKEPPING		-42.40
TOTAL METER POSTAGE	-1,500.00	
TOTAL Not Categorized ===1989 HEADQUARTERS===	-376.89	
TOTAL ===1989 HEADQUARTERS===		-2,159.29
TOTAL ===1989 ORGANIZATION===		-112.35
TOTAL ===1989 POLITICAL===		-224.22
TOTAL ===RETURNED CHECKS===		-25,568.00
TOTAL ===TRANSFERS===		-328,200.00
TOTAL EXPENSES		-378,304.72
OVERALL TOTAL		-378,304.72

Description Amount

EXPENSES

TOTAL 1988 EXPENSES

28,299.33

===1989 COMMUNICATION===

EARNED MEDIA

TOTAL News Releases/Editor -17.24

TOTAL Legislative Flyeround -98.50

TOTAL MediaLink -906.35

TOTAL Not Categorized EARNED MEDIA -294.60

TOTAL EARNED MEDIA -1,316.69

INTRA-PARTY COMMUNICATION

TOTAL "Winning Edge" -3,690.13

TOTAL State Fair Booth -2,054.99

TOTAL Not Categorized INTRA-PARTY COMMUNICATION -195.71

TOTAL INTRA-PARTY COMMUNICATION -5,940.45

COMMUNICATION AIDS

TOTAL Photography/Equipment -1,024.19

TOTAL Audio Mult Box for Events -100.00

TOTAL TV Studio Production -56.56

TOTAL COMMUNICATION AIDS -1,180.75

SALARIES

TOTAL Communication Director -23,695.14

TOTAL Communication FICA -2,926.54

TOTAL Comm. Health Insurance -937.67

TOTAL Not Categorized SALARIES -374.50

TOTAL SALARIES -27,933.85

TOTAL Not Categorized ===1989 COMMUNICATION=== -8,385.45

TOTAL ===1989 COMMUNICATION===

34,797.19

===1989 FINANCE===

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92040905521

Description	Amount
TOTAL DIRECT MAIL	-34,012.98
TOTAL TELEMARKETING	-115,015.37
TOTAL EVENTS	-36,646.11
TOTAL OTHER	-5,036.14
TOTAL BACKEND/FULFILLMENT	-21,231.49
<b>SALARIES</b>	
TOTAL Finance Director	-3,169.01
TOTAL Finance Acting Director	-13,736.34
TOTAL Events Coordinator	-6,570.76
TOTAL Finance Div FICA	-3,580.19
TOTAL Finance Health Insurance	-921.54
TOTAL Finance Consulting Fees	-4,594.44
TOTAL SALARIES	-34,482.28
TOTAL Finance Health Insurance	-222.94
TOTAL Not Categorized ===1989 FINANCE===	-134,473.89
TOTAL ===1989 FINANCE===	-381,140.00
===1989 HEADQUARTERS===	
<b>OFFICE/RENT</b>	
TOTAL Rent	-24,983.31
TOTAL Parking	-1,680.00
TOTAL Storage	-465.25
TOTAL Cleaning	-1,170.00
TOTAL OFFICE/RENT	-28,298.56
<b>BOOKKEPPING</b>	
TOTAL Computer Lease	-15,267.79
TOTAL Bank Charges	-54.34
TOTAL Not Categorized BOOKKEPPING	-1.50

92040905522

Description	Amount
TOTAL BOOKKEEPING	-15,523.63
LONG DISTANCE PHONE	
TOTAL Teleconnect	-5,930.31
TOTAL AT&T	-94.34
TOTAL LONG DISTANCE PHONE	-5,985.05
PHONE SERVICE/LINE FEES	
TOTAL US West	-3,224.90
TOTAL PHONE SERVICE/LINE FEES	-3,224.90
UTILITIES	
TOTAL Electricity	-2,322.82
TOTAL Not Categorized UTILITIES	-526.04
TOTAL UTILITIES	-2,848.86
TOTAL AUDIT	-1,357.00
LEGAL EXPENSES	
TOTAL Retainer	-3,300.00
TOTAL Expenses	-285.72
TOTAL LEGAL EXPENSES	-3,585.72
MAINTENANCE CONTRACTS	
TOTAL Copiers	-3,281.18
TOTAL Phones	-1,076.40
TOTAL MAINTENANCE CONTRACTS	-4,357.58
EQUIP RENT/LEASE/PURCHASE	
TOTAL Mail System	-1,816.84
TOTAL Facsimile Machine	-503.00
TOTAL Dictaphone	-332.02
TOTAL Not Categorized EQUIP RENT/LEASE/PURCHASE	-34,720.97
TOTAL EQUIP RENT/LEASE/PURCHASE	-37,372.83
OFFICE SUPPLIES	
TOTAL Paper	-1,694.07

92040905523

Description	Amount	
TOTAL Toner	-708.56	
TOTAL Printer Ribbons/Labels	-127.50	
TOTAL Other (pens, etc.)	-1,130.34	
TOTAL Not Categorized OFFICE SUPPLIES	-984.46	
TOTAL OFFICE SUPPLIES		-4,644.73
<b>SERVICE</b>		
TOTAL Copiers	-77.26	
TOTAL SERVICE		-77.26
TOTAL METER POSTAGE		-5,250.00
TOTAL INSURANCE		-1,000.00
<b>LOAN</b>		
TOTAL Interest	-24,414.43	
TOTAL LOAN		-24,414.43
<b>UNEMPLOYMENT TAXES</b>		
TOTAL State Unemployment	-2,349.82	
TOTAL Federal Unemployment	-486.64	
TOTAL UNEMPLOYMENT TAXES		-2,836.46
<b>SALARIES</b>		
TOTAL Executive Director	-27,737.50	
TOTAL Transitional Director	-2,784.50	
TOTAL Comptroller	-17,418.84	
TOTAL Bookkeeper	-11,562.75	
TOTAL Executive Secretary	-613.28	
TOTAL Receptionist	-10,089.57	
TOTAL Secretary	-1,496.56	
TOTAL Admin. FICA	-11,583.62	
TOTAL Admin. Health Insurance	-2,503.09	

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4

Description	Amount
TOTAL Not Categorized SALARIES	-556.80
TOTAL SALARIES	-86,346.51
TOTAL Admin. Health Insurance	-335.93
ADMIN. PERSONNEL EXPENSES	
TOTAL Admin. Conference Expense	-1,141.07
TOTAL Admin Travel	-671.73
TOTAL Automobile (State Party)	-2,543.76
TOTAL Not Categorized ADMIN. PERSONNEL EXPENSES	-2,000.00
TOTAL ADMIN. PERSONNEL EXPENSES	-6,356.56
TOTAL Not Categorized ===1989 HEADQUARTERS===	-81,152.94
TOTAL ===1989 HEADQUARTERS===	
===1989 ORGANIZATION===	
PROGRAMS	
===1989 ORGANIZATION===	
TOTAL Seminar Travel Expense	-423.32
TOTAL ===1989 ORGANIZATION===	-423.32
TOTAL Voter File	-7,146.30
TOTAL Special Events Kits	-973.17
TOTAL Campaign Plan	-45.76
TOTAL Video	-746.25
Training Seminars (8)	
TOTAL Seminar Manuals	-1,494.57
TOTAL Seminar Travel Expense	-445.99
TOTAL Seminar Beverages	-298.88
TOTAL Not Categorized Training Seminars (8)	-629.07
TOTAL Training Seminars (8)	-2,868.51
TOTAL Field Staff: Expenses	-300.28
TOTAL Area Analysts: Expenses	-399.05

92040905525

Description	Amount
TOTAL Voter Registration Rebate	-970.00
TOTAL Precinct Canvass	-81.45
TOTAL Not Categorized PROGRAMS	-111.28
TOTAL PROGRAMS	-14,065.37
<b>SALARIES</b>	
TOTAL Organization Director	-19,600.23
TOTAL Organization Field Staff	-1,732.86
TOTAL Organ. Div. FICA	-2,422.32
TOTAL Organization Health Ins.	-561.63
TOTAL SALARIES	-24,317.04
TOTAL Organization Health Ins.	-112.33
TOTAL ORGANIZATION DIV EXPENSES	-2,077.30
TOTAL Not Categorized ===1989 ORGANIZATION===	-14,525.88
TOTAL ===1989 ORGANIZATION===	-2,077.30
<b>===1989 POLITICAL===</b>	
TOTAL Organization Health Ins.	-224.22
<b>PROGRAMS</b>	
TOTAL Tabloids	-475.00
TOTAL Video	-746.25
TOTAL Incumbency Services	-301.65
TOTAL Candidate Assistance	-800.00
TOTAL PROGRAMS	-2,322.90
TOTAL Tabloids	-4,044.95
<b>SALARIES</b>	
TOTAL Political Director	-22,588.00
TOTAL Assistant Political Direc	-12,366.42
TOTAL Political FICA	-5,941.48
TOTAL Political Health Insuranc	-691.20

92040905526

Description	Amount
TOTAL SALARIES	-41,387.10
POLITICAL DIV EXPENSES	
TOTAL Political Dir. Expenses	-1,894.73
TOTAL Asst. Pol. Dir. Expenses	-1,325.21
TOTAL Not Categorized POLITICAL DIV EXPENSES	-134.29
TOTAL POLITICAL DIV EXPENSES	-3,379.19
TOTAL Not Categorized ===1989 POLITICAL===	-5,000.36
TOTAL ===1989 POLITICAL===	-57,438.72
=REINBURSABLE EXPS(1989)=	
TOTAL Finance Div. Rein.	-529.60
TOTAL Headquarters Reimbursed	-615.70
TOTAL Organization Reimbursed	-198.00
TOTAL Political Division Rein	-2,407.42
TOTAL POP	-576.27
TOTAL Not Categorized =REINBURSABLE EXPS(1989)=	-153.94
TOTAL =REINBURSABLE EXPS(1989)=	-4,480.93
TOTAL ===RETURNED CHECKS===	-1,003.00
=STATE CENTRAL COMMITTEE=	
SCC EXPENSES	
TOTAL Chair Allowance	-16,812.45
TOTAL Co-Chair Allowance	-4,374.98
TOTAL SCC Member Expenses	-10,610.97
TOTAL Meeting Expense	-2,337.53
TOTAL Council Expenses	-209.04
TOTAL Not Categorized SCC EXPENSES	-2,950.54
TOTAL SCC EXPENSES	-37,295.51
RNC EXPENSES	
TOTAL RNC Meeting Expenses	-3,139.76

RPISTATE  
1/31/90

Description	Amount
TOTAL Conn-persons Expenses	-1,955.48
TOTAL RNC EXPENSES	-5,095.24
TOTAL Not Categorized -STATE CENTRAL COMMITTEE-	-14,905.19
TOTAL -STATE CENTRAL COMMITTEE-	-57,295.90
TOTAL EXPENSES	-996,042.98
OVERALL TOTAL	-996,042.98

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COMPUTATION OF ALLOCATION FOR FEDERAL ACTIVITY

Year-end Report - 07/01/89 thru 12/31/89

1. Total Expenses Year-to-date:	\$ <u>1,147,193.63</u>
2. Total Expenses for Federal Activity YTD:	\$ <u>33,046.00</u>
3. Percent of Expenses for Federal Activity:	<u>2.00%</u>
4. Total Administrative Expenses:	\$ <u>623,394.18</u>
5. Multiply Administrative Expenses by 2-Factor:	\$ <u>12,467.88</u>
6. Allocation Year-to-date:	\$ <u>12,467.88</u>
7. Less Allocation Paid-to-date:	\$ <u>92,300.00</u>
8. Total Due this Reporting Period:	\$ <u>0.00</u>

(Credit of \$79,832.12 carried over to 1990.)

92040905528

COMPUTATION OF ALLOCATION FOR FEDERAL ACTIVITY  
Year End Report - 11/29/88 - 12/31/88

1. Total Expenses Year-to-date:	\$1,675,277.57
2. Total Expenses for Federal Activity Year-to-date:	173,490.60
3. Percent of Expenses for Federal Activity:	10.35%
4. Total Administrative expenses	584,403.12
5. Multiply Administrative Expenses by %-factor:	60,485.72
6. Allocation Year-to-date:	60,485.72
7. Less Allocation Paid-to-date:	95,000.00
8. Total Due this Reporting Period:	\$. 0.00

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BEFORE THE FEDERAL ELECTION COMMISSION

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IN THE MATTER OF : MUR 3127  
THE REPUBLICAN PARTY OF IOWA :  
AND STEPHEN W. ROBERTS, AS : REQUEST FOR PRE-PROBABLE  
TREASURER : CAUSE CONCILIATION ON ISSUE  
: OF AN EXCESSIVE INDIVIDUAL  
: CONTRIBUTION

---

COMES NOW the Republican Party of Iowa and Stephen W. Roberts, as Treasurer, by its general counsel, Ralph R. Brown, and pursuant to 11 Code of Federal Regulations §111.18(d) requests pre-probable cause conciliation with respect to the Commission staff's initial finding that the Party's federal account in 1987 received an excessive contribution from one individual, and in support thereof respectfully states as follows:

1. The Republican Party of Iowa did deposit in its federal account contributions in 1987 from Randy Rodgers of Shenandoah, Iowa, as follows:

September 6, 1987	\$ 275.00
September 15, 1987	200.00
September 16, 1987	8,000.00

which sum exceeded by \$3,475.00 the limit established in 2 United States Code §441a(a)(1)(C).

2. On May 30, 1988, Randy Rodgers signed a request that \$3,475.00 of his contributions be redesignated to the Committee's state account, and on June 8, 1988, that sum was transferred from

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the Committee's federal account to its state account. Attached as Exhibit "A" is a copy of the signed redesignation and transfer check. While the transfer occurred more than sixty days after the date of the contribution, the entire excess was transferred.

3. The \$8,000.00 contribution could have been -- and should have been -- deposited in the Party's state account. Through oversight, however, it was deposited in the wrong account.

4. The Republican Party of Iowa acknowledges that an excessive contribution was accepted and deposited in its federal account, but states that the excessive contribution was redesignated and transferred to the state account some two and one-half years prior to the Commission's finding that there was reason to believe that the Committee had violated the limit set out in federal law.

5. In nearly two decades of reporting since the enactment of the Federal Election Campaign Act of 1971, this is the only instance of the Committee's depositing an excessive contribution, an act which was remedied by the indicated redesignation and transfer.

6. Conciliation is defined by the Commission as an attempt to correct or prevent a violation of the Act by informal methods of conference and persuasion. The Republican Party of Iowa affirmatively states that it already two and one-half years prior to this proceeding has corrected the violation and has taken all steps to prevent a subsequent violation of the Act. This is demonstrated by the fact that in the intervening two and one-half

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years no similar excessive contributions have been received and deposited in the federal account.

7. The original excessive contribution was deposited to the federal account through error and oversight and was not intentional on the part of the Committee. This is demonstrated by the redesignation and transfer subsequent to the initial deposit.

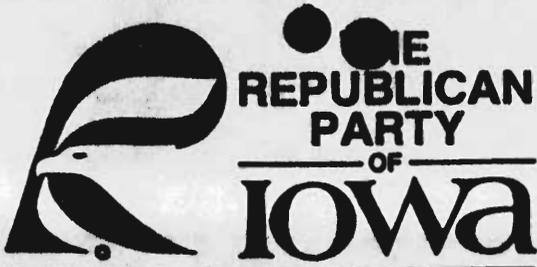
WHEREFORE, The Republican Party of Iowa respectfully requests that the Commission determine that any violation of law was neither willful nor intentional, and that the Committee prior to the initiation of this action took corrective action and has seen to it that this one isolated violation in nearly twenty years of reporting has not since occurred; that conciliation is appropriate; and that no penalty should be imposed for the reason that any violation was rendered moot by the corrective action of redesignation and transfer.

REPUBLICAN PARTY OF IOWA

By *Ralph R. Brown*  
Ralph R. Brown, General Counsel

of McDonald, Brown & Kimple  
Attorneys at Law  
502 15th Street  
P.O. Box 250  
Dallas Center, Iowa 50063  
(515) 992-3728

92040905532



May 30, 1988

Michael W. Mahaffey  
Republican Party of Iowa  
521 East Locust  
Des Moines, IA 50309

Dear Mike:

I hereby authorize you to transfer \$3,475 of my contributions made on September 6, 1988, September 15, 1987 and September 16, 1987 to the state account, which has no contribution limitations.

Sincerely,

Randy Rodgers

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REPUBLICAN STATE CENTRAL COMMITTEE

814

FEDERAL ACCOUNT  
1540 HIGH ST. PH. 282-8105  
DES MOINES, IA 50309

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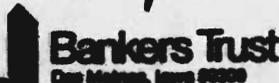
PAY TO THE ORDER OF

RSCC - State Account

8 June 19 88

\$ 3,475

Three thousand four hundred seventy five and 00/100 DOLLARS



FOR TRANSFER - Rodgers

⑆000814⑆ ⑆073000642⑆ 01 405 ⑆⑆

BEFORE THE FEDERAL ELECTION COMMISSION

---

IN THE MATTER OF : MUR 3127  
THE REPUBLICAN PARTY OF IOWA :  
AND STEPHEN W. ROBERTS, AS : RESISTANCE AND DENIAL TO  
TREASURER : COMMISSION'S FINDING THAT  
: THERE IS REASON TO BELIEVE  
: THE COMMITTEE VIOLATED  
: REGULATIONS GOVERNING THE  
: ALLOCATION OF ADMINISTRATIVE  
: EXPENSES

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22040905534  
COMES NOW The Republican Party of Iowa and Stephen W. Roberts, as Treasurer, by its general counsel, Ralph R. Brown, and denies that it has violated any provision of 11 Code of Federal Regulations §106.1(e) governing the allocation of administrative expenses between federal and non-federal accounts, and respectfully states as follows:

1. 11 Code of Federal Regulations §106.1(e) provides that Party committees which have established federal campaign committees "shall allocate administrative expenses on a reasonable basis between their federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis". [emphasis added]

2. During the 1975-1976 election cycle, the undersigned general counsel served as treasurer of The Republican Party of Iowa and made the Party's first allocation of administrative expenses. Attached as Exhibit "A" is a copy of an attachment to

the Committee's October 15, 1980, report showing the method of allocation used in the 1975-1976, 1977-1978, and 1979-1980 election cycles ... which contains the identical language used by the undersigned in 1976, and which computation determined the federal percentage of total expenditures and then applied that percentage against administrative expenses.

3. In 1981 the Republican Party of Iowa was the subject of an on-site audit by the Federal Election Commission, and during that audit no objection was made to the method of allocation utilized by the Committee to that time. Accordingly, that method was continued through December 31, 1989.

4. On June 15, 1990, (following a September 22, 1988, Notice seeking comments) the Commission published a notice in the Federal Register setting forth new regulations revising the rules for allocating expenditures between federal and non-federal accounts, which regulations take effect on January 1, 1991. In anticipation of these revisions, which have not yet taken effect, the Committee modified its allocation formula on its 1990 reports. Attached as Exhibit "B" is a copy of the method of computation of the allocation for 1989; and attached as Exhibit "C" is an example of the computation of the allocation on 1990 reports, and which utilizes a different formula.

5. On September 7, 1988, Reports Analyst Elizabeth Jones of the Commission wrote to The Republican Party of Iowa and stated, in part:

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"It appears from the 'Computation of Allocation For Federal Activity' attached to your July [1988] Quarterly Report that the allocation for the Federal portion of the administrative expenses was based solely on direct contributions to Federal candidates, while the allocation for the non-Federal portion of said expenses was based on all expenditures for non-Federal activity. A reasonable method of allocating administrative expenses is to consider direct contributions to Federal candidates versus direct contributions to non-Federal candidates. Enclosed is Advisory Opinion 1982-5 which may assist you in recalculating the Federal share of your committee's administrative expenses."

6. Upon receipt of the letter the undersigned general counsel had telephone conversations with both Elizabeth Jones and Lisa Stolaruk of the Commission. In those conversations the undersigned described the method of allocation used by the Republican Party of Iowa since 1976 and the undersigned was given no indication by either Ms. Jones or Ms. Stolaruk that either had a basis for determining that the method utilized violated the Commission's regulations.

7. Upon the request of Ms. Stolaruk, the undersigned confirmed in writing the points raised during the telephone conversations. Attached as Exhibit "D" is a copy of that letter dated October 20, 1988, together with appropriate attachments. In this correspondence, the undersigned specifically stated:

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"We believe that we are following the requirements of the Commission's current regulations ... although we understand on September 22, 1988, the Commission issued a Notice seeking comments on possible revisions to the rules relating to allocation."

"The Republican Party of Iowa stands ready to fully comply with any and all requirements. If, upon review, you have authority to demonstrate that our current method of allocation is incorrect, we will be more than happy to follow your direction. [emphasis added] Our September Quarterly Report showed that we already had paid \$75,000.00 from the federal account to the state account for the allocation, which leaves us a credit of \$52,137.21 for computations following October 1, 1988.

"Obviously if the Commission amends the regulation we will follow any new regulations to the best of our ability.

"We look forward to your response in order that we may know whether further action is required or not."

[emphasis added]

8. On December 7, 1988, Reports Analyst Elizabeth Jones again wrote the Republican Party of Iowa in apparent response to the undersigned's letter of October 20, 1988. However, Ms. Jones' letter (a copy of which is attached as Exhibit "E") made no reference at all to the issue of allocation.

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9. The Republican Party of Iowa specifically stated over two years ago that it stood ready to fully comply with any and all requirements of the Commission relative to the computation of the allocation, and specifically stated that if, upon review of the material submitted to the Commission, the Commission demonstrated that the current method of allocation was incorrect, that the Republican Party of Iowa would be more than happy to follow the Commission's direction. The Republican Party of Iowa received no response to its letter of October 20, 1988 -- until nearly two years later it received a letter under date of October 1, 1990, opining that there was a question raised as to whether the Republican Party of Iowa used a valid allocation method, and that there therefor was reason to believe that the Committee may have violated the regulation which provides that the Committee must allocate administrative expenses between federal and non-federal accounts on a reasonable basis.

10. In her original communication of September 7, 1988, Elizabeth Jones suggested that a reasonable method of allocating administrative expenses was to consider direct contributions to federal candidates versus direct contributions to non-federal candidates. In 1988 the Republican Party of Iowa made no direct contributions to either federal or state candidates. Accordingly, under Ms. Jones' method there would have been no basis for determining allocation in 1988. In 1989 the Republican Party of Iowa made an in-kind contribution to a federal candidate in an

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amount less than \$5,000.00 and no contributions to state candidates. Again, such a method of allocation would be meaningless.

11. In its communication of October 1, 1990, the Commission for example purposes computed the allocation of expenses by the "funds expended" formula and found that an additional \$225,895.00 should have been allocated in 1988 and an additional \$32,588.00 allocated in 1989.

12. In fact, in calendar year 1988, in addition to specific transfers from the federal account to the state account for the allocation of administrative expenses, the following undesignated transfers were made from the federal account to the state account:

01-06-88	\$ 6,000.00
01-18-88	3,000.00
01-18-88	7,000.00
01-29-88	25,000.00
02-04-88	10,000.00
02-08-88	10,000.00
02-12-88	10,000.00
02-16-88	10,000.00
02-29-88	30,000.00
04-26-88	50,000.00
04-29-88	10,000.00
05-11-88	30,000.00
08-25-88	25,000.00
09-06-88	15,000.00
12-15-88	20,000.00
12-28-88	6,300.00

for a total of \$267,300.00 -- an amount which exceeds by \$41,405.00 the additional allocation suggested by the Commission.

13. Further, in 1989, the following transfers were made from the federal account to the state account, but not designated as a transfer for the allocation:

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06-30-89	15,000.00
07-11-89	30,000.00
07-31-89	30,000.00
08-16-89	15,000.00
08-16-89	20,000.00
08-24-89	11,000.00
08-31-89	7,000.00
09-01-89	3,100.00
09-01-89	3,700.00
09-05-89	1,000.00
09-05-89	5,000.00
09-06-89	2,000.00
09-08-89	1,500.00
09-15-89	5,000.00
10-02-89	16,000.00
10-13-89	25,000.00
10-24-89	25,000.00
11-09-89	50,000.00
11-15-89	10,000.00
11-27-89	45,000.00

for a total of \$627,800.00 -- or a sum which exceeds by \$595,212.00 the deficiency suggested by the Commission.

14. It is the contention of the Republican Party of Iowa that its method of allocation utilized in 1988 and 1989, which was not criticized by the Federal Election Commission in its on-site audit in 1981, properly fell under the Commission's regulations, and constitutes a reasonable basis for the allocation. Further, when given an opportunity two years ago to provide authority that the method was not proper, and directions on any revised method, the Commission failed to respond to the Committee's specific request.

15. Finally, if the Commission were correct in its determination that the method utilized by the Republican Party of Iowa was incorrect and that the "funds expended" formula should have been utilized, there were more than ample transfers from the

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federal account to the state account in 1988 and 1989 to fully comply with the calculated allocation. If appropriate, the Republican Party of Iowa will amend its 1988 and 1989 reports to show those undesignated transfers as an allocation for administrative expenses.

WHEREFORE, the Republican Party of Iowa respectfully asks that the Commission determine that the Committee has used a valid allocation method; and that in the alternative sufficient transfers were made in 1988 and 1989 to cover any alternative allocation method; and that there is no reason to believe that the Committee has violated 11 Code of Federal Regulations §106.1(e).

REPUBLICAN PARTY OF IOWA

By *Ralph R. Brown*  
Ralph R. Brown, General Counsel

of McDonald, Brown & Kimple  
Attorneys at Law  
502 15th Street  
P.O. Box 250  
Dallas Center, Iowa 50063  
(515) 992-3728

92040905541



# REPUBLICAN STATE CENTRAL COMMITTEE OF IOWA

1540 HIGH STREET DES MOINES, IOWA 50309 (515) 282-8105

STEPHEN W. ROBERTS, Chairman  
DIANA STADTMUELLER, Co-Chairman  
TIMOTHY N. HYDE, Executive Director

October 15, 1980

The expenditures on Schedule F are those which, under 14 U.S.C. 441a (d) (3), the Republican State Central Committee of Iowa is allowed to make expenditures totaling \$14,720 in connection with each of Iowa's six congressional campaigns, and \$61,235.20 for the U. S. Senate races.

Under regulation section 102.6 the Republican State Central Committee of Iowa files as this federal report both federal and non-federal activities. Since the Committee's activity in federal elections is limited, the bulk of this report relates solely to the Committee's state and local activities.

Under section 56.18 et seq. of the Code of Iowa, the Republican State Central Committee receives income tax checkoff proceeds from the Iowa income tax. Between December 1, 1978, and September 30, 1980, a total of \$209,704.50 was received from the State Comptroller in income tax checkoff proceeds. These funds are maintained in a separate checking account as required by state law.

Contributions to each of our federal candidates (not to exceed \$5,000) and expenditures on behalf of each federal candidate are made only from this account. No other state party funds are used in connection with the federal elections. Accordingly, it has not been necessary to solicit funds (Reg. sec. 102.6 (b)) with an express statement that the contribution will be used for federal elections.

From January 1, 1980, to September 30, 1980, this report indicates total expenditures by the Republican State Central Committee of Iowa in the amount of \$644,703.37. During this period, \$5,000 has been contributed to federal candidates, and \$29,448.56 has been expended on behalf of federal campaigns.

Under regulation section 106.1 (e), we are required to allocate administrative expenses on a reasonable basis between our federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis.

Accordingly, since 18.71 percent of our expenditures between January 1, 1980 and September 30, 1980, have been in connection with the federal election, we are allocating 19.71 percent of our remaining administrative expenses as required. Administrative expenses during this period total \$253,795.56--so the allocation is \$47,485.15, all of which has been paid from the income tax checkoff account which is solely used for federal expenditures.

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COMPUTATION OF ALLOCATION FOR FEDERAL ACTIVITY

Year-end Report - 07/01/89 thru 12/31/89

1. Total Expenses Year-to-date:	\$ <u>1,147,193.63</u>
2. Total Expenses for Federal Activity YTD:	\$ <u>33,046.00</u>
3. Percent of Expenses for Federal Activity:	<u>2.00%</u>
4. Total Administrative Expenses:	\$ <u>623,394.18</u>
5. Multiply Administrative Expenses by 2-Factor:	\$ <u>12,467.88</u>
6. Allocation Year-to-date:	\$ <u>12,467.88</u>
7. Less Allocation Paid-to-date:	\$ <u>92,300.00</u>
8. Total Due this Reporting Period:	\$ <u>0.00</u>

(Credit of \$79,832.12 carried over to 1990.)

Exhibit "B"

92040905543

**COMPUTATION OF ALLOCATION FOR FEDERAL ACTIVITY**  
**Quarterly Report -- 10/01/90 thru 10/17/90**

Determination of Overhead

Total Expenses:	\$1,531,999
Less Direct Costs:	\$ 401,933
Less Fundraising:	\$ 504,171
<b>OVERHEAD TOTAL:</b>	<u>\$ 625,895</u> =====

Allocations

Gross Income Method

	<u>Gross Income</u>	<u>Percent</u>	<u>Overhead</u>	<u>Allocation</u>
State	\$ 617,112	37%	625,895	\$ 231,581
Federal	\$1,039,854	63%	625,895	\$ 394,314
<b>TOTAL</b>	<u>\$1,656,966</u>	<u>-----</u>		<u>\$ 625,895</u>

Federal Allocation Year-to-Date:	394,314
Less Allocation Paid-to-Date:	\$ 634,233
Less Allocation carried over from 1989:	\$ 79,832
<b>Total Due this Reporting Period:</b>	<u>\$ 0</u> =====

(credit of \$319,751 will be carried over to next quarter)

9  
2  
0  
4  
0  
9  
0  
5  
5  
4  
4

**McDONALD, BROWN & KIMPLE**

ATTORNEYS AT LAW  
302 - 15TH STREET  
P.O. BOX 250

DALLAS CENTER, IOWA 50063-0250

October 20, 1988

TELEPHONE  
(515) 682-3720

GUY H. HALL (1982-1984)

JOHN C. McDONALD  
RALPH R. BROWN  
JONATHAN M. KIMPLE  
CHARLES H. FASEN

Ms. Elizabeth Jones  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

RE: Republican Party of Iowa  
Identification No.: C00014498

Dear Ms. Jones:

Following telephone conversations with you and Lisa Stolaruk, and at the request of Ms. Stolaruk, please consider this letter as a response to your letter directed to the Republican Party of Iowa dated September 7, 1988.

While your letter did not specifically indicate that an error was made in the Party's reporting of the allocation of administrative expenses, it did question the method we have used.

For reference purposes, and marked Attachment "1", I enclose a copy of our computation of allocation for federal activity for the report covering the period ending June 30, 1988. Further, marked Attachment "2", I enclose a copy of a similar computation attached to our report for the period ending September 30, 1980.

Attachment "2" represents the format attached to our reports during campaign years 1976, 1978, and 1980 ... while Attachment "1" reflects the attachments to reports in campaign years 1982, 1984, 1986, and 1988. In short, we have been utilizing the identical method since 1976. I know, because as executive director of the Republican Party of Iowa in 1976, I drafted the narrative attachment as represented by Attachment "2".

The format was changed following an audit by the Federal Election Commission in which the Commissioner recommended that instead of maintaining one account for both federal and state activity, that the Party maintain two separate accounts. Generally speaking, nearly all contributions are deposited originally in the federal

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**COPY**  
**FOR YOUR FILES**  
McDONALD, BROWN & KIMPLE

Exhibit "D"

Ms. Elizabeth Jones  
RE: Republican Party of Iowa  
October 20, 1988  
Page 2

account. From that account expenditures are made in connection with federal activity and some state activity, while the bulk of the funds in the federal account are transferred to the state account for spending from that account.

We are very familiar with 11 CFR §106.1(e) which provides that Party committees which have established federal campaign committees:

"shall allocate administrative expenses on a reasonable basis between their federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis."

We feel that we have allocated administrative expenses in proportion to the amount of funds expended on federal and non-federal elections.

We first show total expenses of the Republican Party of Iowa ... followed by expenses for federal activity only. We then apply the percent of our total expenses for federal activity against our total administrative expenses. This results in the determination of an allocation.

There was some question on your part that our allocation through June 30, 1988, seemed to be a small amount.

By now, our September quarterly report has been filed, and you will note that our total expenses for federal activity for the year has increased from \$4,000 to \$56,342.42 and our allocation has risen from \$2,214.69 to \$22,862.79.

We believe that we are following the requirement of the Commission's current regulations ... although we understand on September 22, 1988, the Commission issued a Notice seeking comments on possible revisions to the rules relating to allocation.

The Republican Party of Iowa stands ready to fully comply with any and all requirements. If, upon review, you have authority to demonstrate that our current method of allocation is incorrect, we will be more than happy to follow your direction. Our September quarterly report showed that we already had paid \$75,000 from the federal account to the state account for the allocation, which leaves us a credit of \$52,137.21 for computations following October 1, 1988.

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Ms. Elizabeth Jones  
RE: Republican Party of Iowa  
October 20, 1988  
Page 3

Obviously if the Commission amends the regulation we will follow any new regulations to the best of our ability.

We look forward to your response in order that we may know whether further action is required or not.

Very truly yours,

  
Ralph R. Brown  
General Counsel,  
Republican Party of Iowa

RRB:sp

pc: Gina Angelici  
Assistant Treasurer  
Republican Party of Iowa

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COMPUTATION OF ALLOCATION FOR FEDERAL ACTIVITY

July Quarter Report (April 1, 1988 to June 30, 1988)

1. Total expenses year-to-date	<u>\$546,573.24</u>
2. Total expenses for Federal activity year-to-date	<u>4,000.00</u>
3. Percent of expenses for Federal activity	<u>0.7%</u>
4. Total administrative expenses	<u>302,636.01</u>
5. Multiply administrative expenses by % of factor	<u>2,214.69</u>
6. Allocation year-to-date	<u>2,214.69</u>
7. Less allocation paid to date	<u>15,000.00</u>
8. Total due this reporting period	<u>(\$1,973.64)</u>

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# REPUBLICAN STATE CENTRAL COMMITTEE OF IOWA

1540 HIGH STREET DES MOINES, IOWA 50309 (515) 282-8105

STEPHEN W. ROBERTS, Chairman  
DIANA STADTMUELLER, Co-Chairman  
TIMOTHY W. NYDE, Executive Director

October 15, 1980

The expenditures on Schedule F are those which, under 14 U.S.C. 441a (d) (3), the Republican State Central Committee of Iowa is allowed to make expenditures totaling \$14,720 in connection with each of Iowa's six congressional campaigns, and \$61,235.20 for the U. S. Senate races.

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Accordingly, since 18.71 percent of our expenditures between January 1, 1980 and September 30, 1980, have been in connection with the federal election, we are allocating 19.71 percent of our remaining administrative expenses as required. Administrative expenses during this period total \$253,795.56--so the allocation is \$47,485.15, all of which has been paid from the income tax checkoff account which is solely used for federal expenditures.

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COMPUTATION OF ALLOCATION FOR FEDERAL ACTIVITY

1. Total expenses year-to-date
2. Total expenses for Federal activity year-to-date
3. Percent of expenses for Federal activity
4. Total administrative expenses
5. Multiply administrative expenses by % of factor
6. Allocation year-to-date
7. Less allocation paid to date
8. Total due this reporting period

12,111.11  
7,111.11  
58.7%  
7,111.11  
4,111.11  
3,000.00  
1,111.11  
1,111.11

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12-31-86

COMPUTATION OF ALLOCATION FOR FEDERAL ACTIVITY

1. Total expenses year-to-date	<u>1,248,007.58</u>
2. Total expenses for Federal activity year-to-date	<u>98,622.17</u>
3. Percent of expenses for Federal activity	<u>7.90%</u>
4. Total administrative expenses	<u>403,022.91</u>
5. Multiply administrative expenses by % of factor	<u>31,844.34</u>
6. Allocation year-to-date	<u>31,844.34</u>
7. Less allocation paid to date	<u>36,384.00</u>
8. Total due this reporting period	<u>-0-</u>

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11-24-86

91

COMPUTATION OF ALLOCATION FOR FEDERAL ACTIVITY

1. Total expenses year-to-date	(P2)	<u>1,019,115.02</u>
2. Total expenses for Federal activity year-to-date		<u>71,049.18</u>
3. Percent of expenses for Federal activity		<u>6.97%</u>
4. Total administrative expenses	<del>(P2)</del>	<u>275,727.00</u>
5. Multiply administrative expenses by % of factor		<u>27,584.11</u>
6. Allocation year-to-date		<u>27,584.11</u>
7. Less allocation paid to date		<u>25,712.42</u>
8. Total due this reporting period		<u>1,271.69</u>

9204090552

12-15-85

COMPUTATION OF ALLOCATION FOR FEDERAL ACTIVITY

1. Total expenses year-to-date	<u>935,200<sup>83</sup></u>
2. Total expenses for Federal activity year-to-date	<u>37,427.58</u>
3. Percent of expenses for Federal activity	<u>4.00%</u>
4. Total administrative expenses	<u>392,604<sup>85</sup></u>
5. Multiply administrative expenses by % of factor	<u>15,712<sup>40</sup></u>
6. Allocation year-to-date	<u>15,712<sup>40</sup></u>
7. Less allocation <i>PAID</i> to date <i>(Transferred 7-18 + 8-6)</i>	<u>15,000</u>
8. Total due this reporting period	<u>712<sup>40</sup></u>
	<u>7,000</u>

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9-30-86

COMPUTATION OF ALLOCATION FOR FEDERAL ACTIVITY

- 1. Total expenses year-to-date 379,121.45
- 2. Total expenses for federal activity year-to-date 0
- 3. Percent of expenses for federal activity 0
- 4. Total administrative expenses 254,574.31
- 5. Multiply administrative expenses by % of factor 0
- 6. Allocation year-to-date 0
- 7. Less allocation computed to date 0
- 8. Total due this reporting period 0

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

NOV 7 1988

Steven N. Roberts, Treasurer  
Republican Party of Iowa  
521 East Locust  
Des Moines, IA 50309

Identification Number: C00014498

Reference: Amended July Quarterly Report (4/1/88-6/30/88 - dated  
10/20/88)

Dear Mr. Roberts:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-In a letter dated October 20, 1988, your committee explained that "...nearly all contributions are deposited in the federal account. From that account expenditures are made in connection with federal activity and some state activity, while the bulk of the funds in the federal account are transferred to the state account for spending from that account."

It appears that your committee maintains one account for federal activity and a separate account for non-federal activity. While this type of arrangement is provided for under the current regulations (see 11 CFR 102.5(a)(1)(i)), there are certain restrictions on the funds that may be deposited into the federal account. Specifically, only contributions meeting the following conditions may be deposited into the federal account: 1) Contributions designated for the federal account; 2) contributions that result from a solicitation which expressly states that the contribution will be used in connection with a federal election; and 3) contributions from contributors who are informed that all contributions are subject to the prohibitions and limitations of the Act. See 11 CFR 102.5(a)(2)(i) through (iii).

Your committee's practice of initially depositing almost all contributions in the federal account does not appear to comply with the provisions of 11 CFR 102.5(a)(2)(i) through (iii), as described above.

Exhibit "E"

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Please provide an explanation or further clarification regarding the money deposited into your federal account.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Elizabeth Jones  
Reports Analyst  
Reports Analysis Division

92040905556



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MAY 27 11:20

**SENSITIVE**

May 27, 1992

JUN 2 1992

**MEMORANDUM**

**EXECUTIVE SESSION**

**TO:** The Commission

**FROM:** Lawrence M. Noble  
General Counsel

Lois G. Lerner  
Associate General Counsel

**SUBJECT:** Matters Under Review and Exercise of  
Prosecutorial Discretion

**I. BACKGROUND**

In April 1992 this Office circulated a memorandum to the Commission containing a list of cases which we believed warranted the exercise of prosecutorial discretion by the closing of the file. The memorandum also invited the Commission to suggest additional cases for consideration of such action. Presented below are the cases included in our memorandum as well as those suggested to us by a Commissioner for inclusion (as denoted by an asterick).

This report recommends closing certain matters, not closing others, and holding one matter in abeyance. This Office's recommendations as to whether the file should be closed in each matter reflect numerous factors including our present workload, the age of the case, the amount of financial activity involved, and the seriousness of the violation. Closing cases under these circumstances should not necessarily be seen as a decision on how to handle similar cases in the future.

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PAGES 2-13 AND 15-32 DO NOT PERTAIN TO THESE RESPONDENTS.

92040905558

5) NUR 3127\* (I) Republican Party of Iowa (Opened 9-20-90)

NUR 3127 involves an issue of administrative expense allocation under the previous allocation regulation, as well as the receipt of a \$3,475 excessive contribution in late 1987. In substantial mitigation of the violation arising from the allocation issue, the Committee points out that its Federal Account transferred more than enough funds to the Non-federal Account to make up for the former's share of administrative expenses that may have been underpaid. Furthermore, the allocation of administrative expenses pursuant to 11 C.F.R. § 106.1(e) has been superseded by the new allocation regulations which took effect in January 1991, and in 1990, the Committee modified its allocation formula in anticipation of the new regulations.

the original referral had also included \$8,600 in unregistered organization contributions which the Commission decided not to pursue. For all these reasons, this Office recommends the Commission take no further action and close the file in NUR 3127.

9204090559

**III. RECOMMENDATIONS**

1. Take no further action and close the file in:
  - a) MUR 3177
  - b) MUR 3419
  - c) MUR 2745
  - d) MUR 2934
  - e) MUR 3099
  - f) MUR 3127
  - g) MUR 3271
  - h) MUR 3371
  - i) MUR 3441
  - j) MUR 3482
  - k) MUR 3151
  - l) MUR 3239
  
2. Decline to open a Matter Under Review in:
  - a) RAD Referral 92NF-02
  - b) RAD Referral 91L-76
  - c) Pre-MUR 245
  
- 3.
  
4. Approve the appropriate letters containing admonishment language.

92040905560

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Matters Under Review and Exercise ) Agenda Document  
of Prosecutorial Discretion ) #X92-43

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on June 2, 1992, do hereby certify that the Commission took the following actions with respect to the above-captioned matters:

1. Decided by a vote of 5-0 to
  - a) Take no further action and close the file in MUR 3177, MUR 3419, MUR 2745, MUR 3099, MUR 3127, MUR 3271, MUR 3371, MUR 3441, MUR 3482, MUR 3151, and MUR 3239.
  - b) Decline to open a Matter Under Review in RAD Referral 92NF-02, RAD Referral 91L-76, and Pre-MUR 245.
  - c)
  - d) Approve the appropriate letters containing admonishment language, as recommended in the General Counsel's report dated May 27, 1992.

Commissioners Aikens, Elliott, McGarry, Potter, and Thomas voted affirmatively for the decision; Commissioner McDonald was not present at the meeting.

(continued)

92040905561

2. Decided by a vote of 4-0 to take no further action and close the file in NUR 2934.

Commissioners Aikens, Elliott, McGarry, and Thomas voted affirmatively for the decision. Commissioner McDonald was not present at the meeting. Commissioner Potter recused with respect to NUR 2934 and did not cast a vote.

Attest:

6-4-92  
Date

Marjorie W. Emmons  
Marjorie W. Emmons  
Secretary of the Commission

92040905562



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**CLOSED**

June 26, 1992

Ralph R. Brown, Esq.  
McDonald, Brown & Kimple  
502 15th Street  
P.O. Box 250  
Dallas Center, Iowa 50063

RE: NUR 3127  
Republican Party of Iowa and  
Stephen W. Roberts, as  
treasurer

Dear Mr. Brown:

On October 1, 1990, the Republican Party of Iowa ("the Committee") and Stephen W. Roberts, as treasurer, were notified that the Federal Election Commission found reason to believe that they violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 106.1(e). On October 23, 1990, and November 20, 1990, you submitted responses to the Commission's reason to believe findings.

After considering all the circumstances of the matter, and in the exercise of its prosecutorial discretion, the Commission determined on June 2, 1992, to take no further action against the Committee and Stephen W. Roberts, as treasurer, and closed the file. The Commission reminds you, however, that the receipt of an excessive contribution is a violation of 2 U.S.C. § 441a(f) and that the Committee's allocation under the old regulations resulted in a possible violation of 11 C.F.R. § 106.1(e). We note that this latter provision has been superseded by new 11 C.F.R. part 106. You should take immediate steps to insure that the Committee complies with these provisions of the Federal Election Campaign Act of 1971, as amended, and accompanying regulations.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

92040905563

Ralph R. Brown, Esq.  
Page 2

If you have any questions, please contact me at  
(202) 219-3400.

Sincerely,

*Mark Allen*

Mark Allen  
Attorney

92040905564



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3127

DATE FILMED 7/10/92 CAMERA NO. 4

CAMERA MAN E.E.S.

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