



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20463

THIS IS THE END OF TMR # 501

Date Filmed 12/19/78 Camera No. --- 2

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# National Republican Congressional Committee

512 HOUSE OFFICE BLDG. ANNEX • WASHINGTON, D.C. 20515 • TELEPHONE (202) 225-1800

CHAIRMAN  
Guy Vander Jagt, M.C., Michigan  
EXECUTIVE DIRECTOR  
Steven Stockmeyer

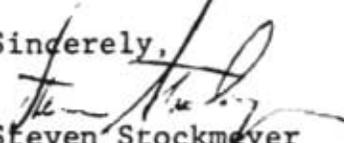
November 29, 1978

Dear Mr. Oldaker:

As was agreed upon in the Conciliation Agreement of MUR 501, effective on November 1, 1978, the National Republican Congressional Committee (NRCC) is submitting evidence of our efforts to obtain the occupations and/or principal place of business missing from our 1975 and 1976 Federal Election Reports. This report specifically responds to that portion of the agreement which reads, "Respondent will furnish to the Commission, within 30 days of the signing of this agreement, evidence of its efforts to obtain the above-mentioned information."

Attached is a sample of the letter we have sent to over 5,000 1975 and 1976 contributors to the NRCC. These individuals were selected from our files on the criteria of: 1) they contributed a single contribution of over \$100 or multiple contributions aggregating over \$100 during either 1975 or 1976; and 2) their occupation and/or principal place of business were missing.

Also enclosed with the letter was a postage paid return envelope for their convenience. We will report such information received on amended reports to the Commission as agreed in the Conciliation Agreement.

Sincerely,  
  
Steven Stockmeyer  
Executive Director

Mr. William Oldaker  
General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C.

VICE CHAIRMEN

- William L. Armstrong, M.C., Colorado
- Trent Lott, M.C., Mississippi
- Lawrence Coughlin, M.C., Pennsylvania
- Joel Pritchard, M.C., Washington
- Norman Lent, M.C., New York
- John Rousset, M.C., California

SECRETARY

John Paul Hammerschmidt, M.C., Arkansas

EXECUTIVE COMMITTEE

- Garry Brown, M.C., Michigan
- John T. Myers, M.C., Indiana
- J. Herbert Burke, M.C., Florida
- Charles Thone, M.C., Nebraska
- David F. Emery, M.C., Maine
- David C. Treen, M.C., Louisiana
- Edwin B. Forsythe, M.C., New Jersey
- Paul S. Tribble, Jr., M.C., Virginia
- James G. Martin, M.C., North Carolina
- Larry Winn, Jr., M.C., Kansas

79710081059



# National Republican Congressional Committee

P.O. BOX 1999 • WASHINGTON, D.C. 20013 • TELEPHONE (202) 225-1800

Dear

Thank you for your support of the National Republican Congressional Committee. Knowing I could count on it has meant a lot to me personally.

Because of your help, we've elected some of the finest Republican Congressman ever. Men like Norm Shumway (CA-14), Newt Gingrich (GA-6), Dan Crane (IL-22), Bill Clinger (PA-23) and Carroll Campbell (SC-4). All in all, I say we had a good election year.

We've been reviewing our records and found we still need some additional information in order for us to meet our past reporting responsibilities under the Federal Election Campaign Act.

I would appreciate it if you would print the information missing in the space indicated at the bottom of this letter, and then return this entire letter to me in the enclosed envelope.

If you have any questions about our Committee or the recent elections, please use the enclosed envelope for that too. I'll be writing you shortly to let you know about our plans for 1979.

Sincerely,  
*Guy Vander Jagt*  
Congressman Guy Vander Jagt  
Chairman  
National Republican  
Congressional Committee

GVJ/lb

The Federal Election Law requires us to request the following information:

Occupation \_\_\_\_\_

Place of Business \_\_\_\_\_  
(Company Name) (Please include city and state)

Please check if self employed

01111 HFDN600J

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 National Republican Congressional Committee

517 HOUSE OFFICE BLDG. ANNEX • WASHINGTON, D.C. 20515

Mr. William Oldaker  
General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C.



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20463

November 14, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

William H. Schweitzer  
Baker, Hostetler, Frost & Towers  
818 Connecticut Avenue, N.W.  
Washington, D.C. 20006

Re: MUR 501

Dear Mr. Schweitzer:

The Commission is in receipt of the Conciliation Agreement which the National Republican Congressional Committee has signed in connection with the above-captioned matter.

Please find enclosed a copy of this Agreement signed by the General Counsel.

This investigation is now terminated. Copies of the Conciliation Agreement and other documents in this case will be placed in the public disclosure file.

As agreed to and referenced in your letter of October 27, 1978, the 30 and 60 day compliance periods referred to in the Conciliation Agreement will begin to run as of November 1, 1978.

Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "William C. Oldaker".

William C. Oldaker  
General Counsel

cc: Mr. Steven Stockmeyer  
Executive Director  
National Republican Congressional Committee

7804008105



(a) Respondent received from the Commission requests for additional information dated September 23, 1976 and February 14, 1977. These requests informed respondent that its monthly report for September, 1976 and its 1976 year end report, respectively, omitted or contained inadequate information concerning the occupation and principal place of business of certain of respondent's contributors.

(b) Respondent answered both requests and informed the Commission that it had undertaken what it considered its best efforts to comply with the pertinent reporting requirements.

(c) Respondent has not amended the above-cited reports with respect to occupation and principal place of business which are the subject matter of the instant Matter Under Review. WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 434(b)(2), a political committee is required to report the occupation and principal place of business for every contributor who contributes to that committee more than \$100 in the aggregate during the calendar year.

II. Respondent, as it has been notified by the Commission by letter dated March 29, 1978, inadequately reported the occupation and principal place of business on its September 1976 monthly report and on its 1976 year-end report for certain of its contributors who contributed more than \$100 in the aggregate, although it was and is the policy of respondent to request that information when soliciting its contributors. Respondent also inadequately reported the same information in its other 1975 and 1976 reports.

7301064

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III. Although respondent believes (a) that its reporting of occupation and principal place of business in 1975 and 1976 complied with the Commission's best efforts standard, and (b) that the September 1976 monthly report and the 1976 year-end report were the only reports cited by the Commission in the Commission's notification letter dated March 29, 1978 as being deficient, respondent hereby agrees to contact its contributors for 1975 and 1976 for which occupation and/or principal place of business were reported inadequately in an effort to obtain such information. Respondent will report such information received on amended reports to be submitted to the Commission within 60 days of the signing of this agreement. Respondent will furnish to the Commission, within 30 days of the signing of this agreement, evidence of its efforts to obtain the above-mentioned information.

IV. Respondent will comply with the provisions of 2 U.S.C. § 434(b)(2) and the best efforts standard referenced in 2 U.S.C. § 434(b)(4) and 11 C.F.R. § 102.9(e) on all future reports to the Commission.

GENERAL CONDITIONS

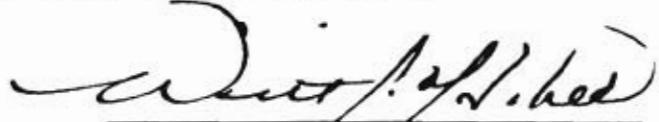
I. The Commission, shall on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1), concerning the matters at issue herein, or on its own motion, review compliance with this Conciliation Agreement. If the Commission believes that this Conciliation Agreement or any requirement thereof has been violated, it may institute a civil action

for relief in the United States District Court for the District of Columbia.

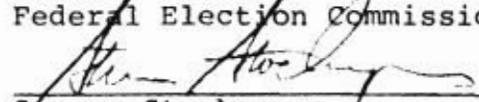
II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g (a) (5) (A) and that this Conciliation Agreement, unless violated, shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Conciliation Agreement.

III. It is mutually agreed that this Conciliation Agreement will become effective upon approval by the Commission and after execution by both parties.

11/10/78  
Date

  
\_\_\_\_\_  
William C. Oldaker  
General Counsel  
Federal Election Commission

10/23/78  
Date

  
\_\_\_\_\_  
Steven Stockmeyer  
Executive Director  
National Republican Congressional  
Committee

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
National Republican Congressional ) MUR 501  
Committee )

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on November 9, 1978, the Commission determined by a vote of 4-0 to adopt the following recommendations, as set forth in the General Counsel's memorandum dated November 6, 1978, regarding the above-captioned matter:

1. That the Commission accept the amended Conciliation Agreement, approved by Commission on September 13, 1978, signed by the respondent and attached to the above-named memorandum.
2. Close the file in this matter.
3. Send the letter attached to the above-named memorandum.

Voting for this determination were Commissioners Springer, McGarry, Thomson, and Harris.

Attest.

11/9/78  
Date

Marjorie W. Emmons  
Marjorie W. Emmons  
Secretary to the Commission

Received in Office of Commission Secretary: 11-7-78, 9:38  
Circulated on 48 hour vote basis: 11-7-78, 11:00

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November 7, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 501 Memo and Conciliation Agreement

The memo sent to the Commission Secretary's office on November 6, 1978 requesting circulation of a conciliation agreement should not go through Orlando Potter. Please eliminate his name from the memo.

Thank you.

78040081068

November 6, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 501

Please have the attached Memo and conciliation agreement distributed to the Commission on a 48 hour tally basis.

Thank you.

78040081069



FEDERAL ELECTION COMMISSION

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

RECEIVED  
OFFICE OF THE  
SECRETARY

78 NOV 7 A 9: 38

November 7, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr *ETG*  
SUBJECT: MUR 501 Memo and Conciliation Agreement

The memo sent to the Commission Secretary's office on November 6, 1978 requesting circulation of a conciliation agreement should not go through Orlando Potter. Please eliminate his name from the memo.

Thank you.

73011731071



FEDERAL ELECTION COMMISSION

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

RECEIVED  
OFFICE OF THE  
SECRETARY

78 NOV 7 A 7: 54

November 6, 1978

MEMORANDUM

TO: THE COMMISSION

~~THROUGH: CECILANDIO B. POTTER~~

FROM: WILLIAM C. OLDAKER  
GENERAL COUNSEL

RE: MUR 501

On September 13, 1978, the Commission approved the amended Conciliation Agreement in this matter. A copy of this Agreement, signed by the Respondent is attached.

The Office of General Counsel recommends that the Commission accept this Agreement and close the file in this matter. We also recommend that the attached letter be sent.

7971031071

BEFORE THE FEDERAL ELECTION COMMISSION

SEPTEMBER , 1978

In the Matter of )  
National Republican Congressional ) MUR 501  
Committee )  
)

CONCILIATION AGREEMENT

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This matter having been initiated by the Federal Election Commission ("Commission") in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Respondent National Republican Congressional Committee violated 2 U.S.C. § 434(b)(2) by omitting or inadequately reporting the occupation and principal place of business of certain of its contributors on its September 1976 monthly report and on its 1976 year-end report.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5) do hereby agree as follows:

- I. The Commission has jurisdiction over Respondent and the subject matter in this case.
- II. Respondent enters voluntarily into this agreement with the Commission.
- III. The pertinent facts in this matter are as follows:

(a) Respondent received from the Commission requests for additional information dated September 23, 1976 and February 14, 1977. These requests informed respondent that its monthly report for September, 1976 and its 1976 year end report, respectively, omitted or contained inadequate information concerning the occupation and principal place of business of certain of respondent's contributors.

(b) Respondent answered both requests and informed the Commission that it had undertaken what it considered its best efforts to comply with the pertinent reporting requirements.

(c) Respondent has not amended the above-cited reports with respect to occupation and principal place of business which are the subject matter of the instant Matter Under Review. WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 434(b)(2), a political committee is required to report the occupation and principal place of business for every contributor who contributes to that committee more than \$100 in the aggregate during the calendar year.

II. Respondent, as it has been notified by the Commission by letter dated March 29, 1978, inadequately reported the occupation and principal place of business on its September 1976 monthly report and on its 1976 year-end report for certain of its contributors who contributed more than \$100 in the aggregate, although it was and is the policy of respondent to request that information when soliciting its contributors. Respondent also inadequately reported the same information in its other 1975 and 1976 reports.

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III. Although respondent believes (a) that its reporting of occupation and principal place of business in 1975 and 1976 complied with the Commission's best efforts standard, and (b) that the September 1976 monthly report and the 1976 year-end report were the only reports cited by the Commission in the Commission's notification letter dated March 29, 1978 as being deficient, respondent hereby agrees to contact its contributors for 1975 and 1976 for which occupation and/or principal place of business were reported inadequately in an effort to obtain such information. Respondent will report such information received on amended reports to be submitted to the Commission within 60 days of the signing of this agreement. Respondent will furnish to the Commission, within 30 days of the signing of this agreement, evidence of its efforts to obtain the above-mentioned information.

IV. Respondent will comply with the provisions of 2 U.S.C. § 434(b)(2) and the best efforts standard referenced in 2 U.S.C. § 434(b)(4) and 11 C.F.R. § 102.9(e) on all future reports to the Commission.

GENERAL CONDITIONS

I. The Commission, shall on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1), concerning the matters at issue herein, or on its own motion, review compliance with this Conciliation Agreement. If the Commission believes that this Conciliation Agreement or any requirement thereof has been violated, it may institute a civil action

for relief in the United States District Court for the District of Columbia.

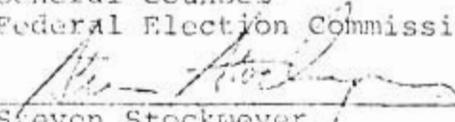
II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g (a) (5) (A) and that this Conciliation Agreement, unless violated, shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Conciliation Agreement.

III. It is mutually agreed that this Conciliation Agreement will become effective upon approval by the Commission and after execution by both parties.

\_\_\_\_\_  
Date

10/23/78  
\_\_\_\_\_  
Date

\_\_\_\_\_  
William C. Oldaker  
General Counsel  
Federal Election Commission

  
\_\_\_\_\_  
Steven Stockmeyer  
Executive Director  
National Republican Congressional  
Committee

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FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

William H. Schweitzer  
Baker, Hostetler, Frost & Towers  
818 Connecticut Avenue, N.W.  
Washington, D.C. 20006

Re: MUR 501

Dear Mr. Schweitzer:

The Commission is in receipt of the Conciliation Agreement which the National Republican Congressional Committee signed in connection with the above-captioned matter.

You will find enclosed a copy of this Agreement signed by the General Counsel.

This investigation is now terminated. Copies of the Conciliation Agreement and other documents in this case will be placed in the public disclosure file.

As agreed to and referenced in your letter of October 27, 1978, the 30 and 60 day compliance periods referred to in the Conciliation Agreement will begin to run as of November 1, 1978.

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker  
General Counsel

cc: Mr. Steven Stockmeyer  
Executive Director  
National Republican Congressional Committee

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BAKER, HOSTETLER, FROST & TOWERS

COUNSELLORS AT LAW  
818 CONNECTICUT AVE., N.W.  
WASHINGTON, D. C. 20006

(202) 857-1500

WRITER'S DIRECT DIAL NO.:

(202) 857-1531

IN CLEVELAND, OHIO  
BAKER, HOSTETLER & PATTERSON  
1956 UNION COMMERCE BUILDING  
CLEVELAND, OHIO 44115  
(216) 821-0200  
TWX 810 481 8375

October 27, 1978

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

Re: MUR 501

Dear Mr. Oldaker:

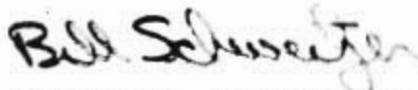
Enclosed is the Conciliation Agreement entered into by the National Republican Congressional Committee ("NRCC") and the Federal Election Commission in Matter Under Review 501. Mr. Steven Stockmeyer, Executive Director of the NRCC, signed this Agreement on October 23, 1978.

Pursuant to a telephone conversation which you and I had approximately two weeks ago, the 30 and 60 day periods for compliance with the Conciliation Agreement will not begin to run until November 1, 1978.

Please send me a copy of the Agreement after you have signed it and after it is formally approved by the Commission.

Thank you for your assistance in this matter.

Very truly yours,



William H. Schweitzer

WHS:gh  
Encl.

cc: Mr. Stockmeyer

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BAKER, HOSTETLER, FROST & TOWERS

818 CONNECTICUT AVE., N. W.

WASHINGTON, D. C. 20006

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



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO CHARLES STEELE  
FROM: MARJORIE W. EMMONS *Marjorie E. Emmons*  
DATE: OCTOBER 20, 1978  
SUBJECT: MUR 501 - Interim Report dated 10-18-78  
Received in OCS 10-19-78,  
12:07

The above-named document was circulated on a 24 hour no-objection basis at 3:30, October 19, 1978.

The Commission Secretary's Office has received no objections to the Interim Report as of 3:30 this date.

79040381070

October 19, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: NUR 501

Please have the attached Interim Report distributed  
to the Commission.

Thank you.

78040081080

RECEIVED  
OFFICE OF THE

78 OCT 19 12: 07

BEFORE THE FEDERAL ELECTION COMMISSION

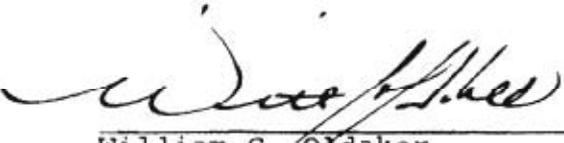
In the Matter of	)	
	)	
The National Republican Congressional	)	MUR 501
Committee	)	

INTERIM REPORT

On September 13, 1978, the Commission approved the proposed conciliation agreement in this matter.

The Office of General Counsel has contacted the counsel for the Respondent and has been informed that the Respondent intends to sign this agreement and forward same to this Office in the near future. At that time the General Counsel will sign this agreement and the sixty day period will begin to run in which the Respondent must obtain contributors' occupation and principal place of business and report this information on amended reports for 1976 and 1977.

10/18/78  
Date

  
\_\_\_\_\_  
William C. Oydaker  
General Counsel

78 OCT 19 12: 07



FEDERAL ELECTION COMMISSION

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

September 29, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

William H. Schweitzer  
Baker, Hostetler, Frost & Towers  
818 Connecticut Ave.,  
Washington, D.C. 20006

Re: MUR 501

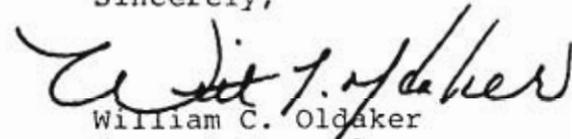
Dear Mr. Schweitzer:

On September 13, 1978, the Federal Election Commission approved the enclosed Conciliation Agreement as amended.

If this Agreement is acceptable to you please have it signed and return it to the Office of General Counsel. At that time a copy of the Agreement signed by Mr. Stockmeyer and the General Counsel will be forwarded to you.

You are reminded that this Conciliation Agreement has not been complied with until: 1) the Commission has received evidence that the National Republican Congressional Committee contacted its contributors for 1975 and 1976 for which the occupation and/or principal place of business were inadequately reported; and, (2) the Commission has received amended reports, within 60 days of the signing of this Agreement, reflecting the additional information received from these contributors.

Sincerely,

  
William C. Oldaker  
General Counsel

Enclosure

cc: Mr. Steven Stockmeyer  
Executive Director  
National Republican Congressional Committee  
521 House Office Bldg. Annex  
Washington, D.C. 20515

7901008103

BEFORE THE FEDERAL ELECTION COMMISSION

SEPTEMBER , 1978

In the Matter of )  
National Republican Congressional ) MUR 501  
Committee )  
)

CONCILIATION AGREEMENT

7 8 7 4 0 7 3 1 0 8 3

This matter having been initiated by the Federal Election Commission ("Commission") in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Respondent National Republican Congressional Committee violated 2 U.S.C. § 434(b)(2) by omitting or inadequately reporting the occupation and principal place of business of certain of its contributors on its September 1976 monthly report and on its 1976 year-end report.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5) do hereby agree as follows:

I. The Commission has jurisdiction over Respondent and the subject matter in this case.

II. Respondent enters voluntarily into this agreement with the Commission.

III. The pertinent facts in this matter are as follows:

(a) Respondent received from the Commission requests for additional information dated September 23, 1976 and February 14, 1977. These requests informed respondent that its monthly report for September, 1976 and its 1976 year end report, respectively, omitted or contained inadequate information concerning the occupation and principal place of business of certain of respondent's contributors.

(b) Respondent answered both requests and informed the Commission that it had undertaken what it considered its best efforts to comply with the pertinent reporting requirements.

(c) Respondent has not amended the above-cited reports with respect to occupation and principal place of business which are the subject matter of the instant Matter Under Review. WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 434(b) (2), a political committee is required to report the occupation and principal place of business for every contributor who contributes to that committee more than \$100 in the aggregate during the calendar year.

II. Respondent, as it has been notified by the Commission by letter dated March 29, 1978, inadequately reported the occupation and principal place of business on its September 1976 monthly report and on its 1976 year-end report for certain of its contributors who contributed more than \$100 in the aggregate, although it was and is the policy of respondent to request that information when soliciting its contributors. Respondent also inadequately reported the same information in its other 1975 and 1976 reports.

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III. Although respondent believes (a) that its reporting of occupation and principal place of business in 1975 and 1976 complied with the Commission's best efforts standard, and (b) that the September 1976 monthly report and the 1976 year-end report were the only reports cited by the Commission in the Commission's notification letter dated March 29, 1978 as being deficient, respondent hereby agrees to contact its contributors for 1975 and 1976 for which occupation and/or principal place of business were reported inadequately in an effort to obtain such information. Respondent will report such information received on amended reports to be submitted to the Commission within 60 days of the signing of this agreement. Respondent will furnish to the Commission, within 30 days of the signing of this agreement, evidence of its efforts to obtain the above-mentioned information.

IV. Respondent will comply with the provisions of 2 U.S.C. § 434(b)(2) and the best efforts standard referenced in 2 U.S.C. § 434(b)(4) and 11 C.F.R. § 102.9(e) on all future reports to the Commission.

GENERAL CONDITIONS

I. The Commission, shall on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1), concerning the matters at issue herein, or on its own motion, review compliance with this Conciliation Agreement. If the Commission believes that this Conciliation Agreement or any requirement thereof has been violated, it may institute a civil action

for relief in the United States District Court for the District of Columbia.

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g (a) (5) (A) and that this Conciliation Agreement, unless violated, shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Conciliation Agreement.

III. It is mutually agreed that this Conciliation Agreement will become effective upon approval by the Commission and after execution by both parties.

\_\_\_\_\_  
Date

\_\_\_\_\_  
William C. Oldaker  
General Counsel  
Federal Election Commission

\_\_\_\_\_  
Date

\_\_\_\_\_  
Steven Stockmeyer  
Executive Director  
National Republican Congressional  
Committee

23710781035

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
National Republican Congressional )  
Committee )

MUR 501

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on September 13, 1978, the Commission approved by a vote of 5-0 the proposed conciliation agreement and draft letters in MUR 501 as attached to the General Counsel's Report signed August 29, 1978, and amended by the General Counsel at the Commission meeting of September 13, 1978.

Commissioner Springer was not present at the time of the vote.

9/15/78

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary to the Commission

73740031037



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO CHARLES STEELE  
FROM: MARJORIE W. EMMONS *MW E*  
SUBJECT: MUR 501 - General Counsel's Report  
Dated 8-19-78  
Signed: 8-29-78  
Received in Office of Commission  
Secretary: 8 30-78, 2:12  
DATE: AUGUST 31, 1978

The above-named document was circulated on a  
48 hour vote basis at 9:30 a.m., August 31, 1978.

Commissioner Harris submitted an objection at  
10 15 this date thereby placing MUR 501 on the Executive  
Session Agenda for September 13, 1978.

cc: Commissioner Harris



August 30, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 501

Please have the attached General Counsel's Report on MUR 501 distributed to the Commission on a 48 hour tally basis.

Thank you.

78040081089

BEFORE THE FEDERAL ELECTION COMMISSION

AUGUST 19 1978

In the Matter of )  
 )  
National Republican Congressional ) MUR 501  
Committee )

GENERAL COUNSEL'S REPORT

On May 17, 1978, the Federal Election Commission found reasonable cause to believe that the National Republican Congressional Committee violated 2 U.S.C. § 434(b)(2) by failing to report the occupation and principal place of business of certain of its contributors. On June 7, the Commission approved an amended conciliation agreement in this matter which was forwarded to the respondent.

After a period of conciliation the General Counsel and the respondent have mutually agreed upon the attached proposed agreement.

With regard to violation of 2 U.S.C. § 434(b)(2) the respondent has not explicitly admitted a violation however the respondent has agreed that it inadequately reported the occupation and principal place of business of certain of its contributors on its 1975 and 1976 reports.

While the provision for a penalty has been omitted, the respondent agrees to contact its contributors for 1975 and 1976 for which occupation and/or principal place of business were inadequately reported in an effort to obtain such information. Respondent has further agreed to present evidence of its efforts to contact these contributors and to file amended reports for 1975 and 1976 with the information obtained.

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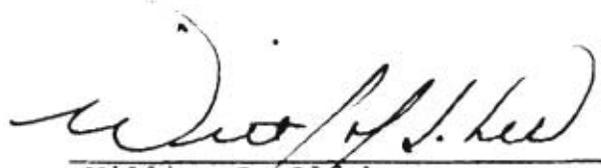
Reference to the findings of the auditors concerning the respondent's inadequate reporting has been omitted from the proposed agreement as no formal audit letter or report has yet been issued by the Commission concerning the audit of the respondent.

Additionally reference has been added to the respondent's institution in 1977 of a new computer system which reports more completely the required occupation and principal place of business data as well as providing an automatic follow up procedure when inadequate information is received from contributors.

Recommendation

Adopt the proposed conciliation agreement and send the attached letters.

8/29/78  
Date

  
\_\_\_\_\_  
William C. Oldaker  
General Counsel

Packet contains

1. G.C. Report
2. Conciliation agreement
3. Ltr to S. Stockmeyer
4. Certification

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III. The pertinent facts in this matter are as follows:

(a) Respondent received from the Commission requests for additional information dated September 23, 1976 and February 14, 1977. These requests informed respondent that its monthly report for September, 1976 and its 1976 year end report, respectively, omitted or contained inadequate information concerning the occupation and principal place of business of certain of respondent's contributors.

(b) Respondent answered both requests and informed the Commission that it had undertaken what it considered its best efforts to comply with the pertinent reporting requirements. Respondent informed the Commission that its efforts included developing a computerized system of more adequately reporting the required occupation and principal place of business data as well as implementing an automatic follow up procedure. This system became operational in the fall of 1977.

(c) Respondent has not amended the above-cited reports with respect to occupation and principal place of business which are the subject matter of the instant Matter Under Review.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 434(b)(2), a political committee is required to report the occupation and principal place of

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business for every contributor who contributes to that committee more than \$100 in the aggregate during the calendar year.

II. Respondent, as it has been notified by the Commission by letter dated March 29, 1978, inadequately reported the occupation and principal place of business on its September 1976 monthly report and on its 1976 year-end report for certain of its contributors who contributed more than \$100 in the aggregate, although it was and is the policy of respondent to request that information when soliciting its contributors. Respondent also inadequately reported the same information in its other 1975 and 1976 reports.

III. Although respondent believes (a) that its reporting of occupation and principal place of business in 1975 and 1976 and its development of its computerized reporting and follow-up system which is now operational complied with the Commission's best efforts standard, and (b) that the September 1976 monthly report and the 1976 year-end report were the only reports cited by the Commission in the Commission's notification letter dated March 29, 1978 as being deficient, respondent hereby agrees to contact its contributors for 1975 and 1976 for which occupation and/or principal place of business were reported inadequately in an effort to obtain such information. Respondent will report such information received on amended reports to be submitted to the Commission within 60 days of the signing of this

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agreement. Respondent will furnish to the Commission, within 30 days of the signing of this agreement, evidence of its efforts to obtain the above- mentioned information.

IV. Respondent will comply with the provisions of 2 U.S.C. § 434(b)(2) and the best efforts standard referenced in 2 U.S.C. § 434(b)(4) and 11 C.F.R. § 102.9(e) on all future reports to the Commission.

GENERAL CONDITIONS

I. The Commission, shall on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1), concerning the matters at issue herein, or on its own motion, review compliance with this Conciliation Agreement. If the Commission believes that this Conciliation Agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g (a)(5)(A) and that this Conciliation Agreement, unless violated, shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Conciliation Agreement.

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III. It is mutually agreed that this Conciliation Agreement will become effective upon approval by the Commission and after execution by both parties.

\_\_\_\_\_  
Date

\_\_\_\_\_  
William C. Oldaker  
General Counsel  
Federal Election Commission

\_\_\_\_\_  
Date

\_\_\_\_\_  
Steven Stockmeyer  
Executive Director  
National Republican Congressional  
Committee

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FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Steven Stockmeyer  
Executive Director  
National Republican Congressional Committee  
512 House Office Bldg. Annex  
Washington, DC 20515

Re: MUR 501

Dear Mr. Stockmeyer:

On August , 1978, the Federal Election Commission approved the enclosed conciliation agreement which has been agreed to by the Commission's General Counsel and Counsel for the National Republican Congressional Committee.

Please sign this agreement and return it to the General Counsel's Office where it will be signed by the General Counsel. At that time a copy of this agreement signed by both parties, will be forwarded to you.

You are reminded that this conciliation agreement has not been complied with until: 1) the Commission has received evidence that the National Republican Congressional Committee contacted its contributors for 1975 and 1976 for which the occupation and/or principal place of business were inadequately reported ; and, (2) the Commission has received amended reports, within 60 days of the signing of this agreement, reflecting the additional information received from these contributors.

Sincerely,

William C. Oldaker  
General Counsel

78040081097

ARC# 1344

BAKER, HOSTETLER, FROST & PATTERSON

COUNSELLORS AT LAW  
818 CONNECTICUT AVE., N.W.  
WASHINGTON, D. C. 20008  
(202) 857-1500

18 AUG 2 P 4:21

WRITER'S DIRECT DIAL NO.:  
(202) 857-1531

IN CLEVELAND, OHIO  
BAKER, HOSTETLER & PATTERSON  
1956 UNION COMMERCE BUILDING  
CLEVELAND, OHIO 44115  
(216) 821-0200  
TWX 810 421 8375

August 2, 1978

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

Re: MUR 501

Dear Mr. Oldaker:

Enclosed is the Conciliation Agreement which you and I drafted during our meeting on July 18, 1978. Mr. Steven Stockmeyer, Executive Director of the National Republican Congressional Committee ("NRCC"), accepts this Agreement on behalf of the NRCC and will sign it after it is approved by the Federal Election Commission.

Thank you for your assistance in this matter.

Very truly yours,

*William H. Schweitzer*  
William H. Schweitzer

WHS:gh  
Encl.

cc: Steven Stockmeyer  
Thomas Josefiak

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
The National Republican	)	MUR 501
Congressional Committee	)	
	)	
Respondent	)	

CONCILIATION AGREEMENT

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This matter having been initiated by the Federal Election Commission ("Commission") in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Respondent National Republican Congressional Committee violated 2 U.S.C. § 434(b)(2) by omitting or inadequately reporting the occupation and principal place of business of certain of its contributors on its September 1976 monthly report and on its 1976 year-end report.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Commission has jurisdiction over Respondent and the subject matter in the case.

II. Respondent enters voluntarily into this agreement with the Commission.

III. The pertinent facts in this matter are as follows:

(a) Respondent received from the Commission requests for additional information dated September 23, 1976 and February 14, 1977. These requests informed respondent that its monthly report for September, 1976 and its 1976 year end report, respectively, omitted or contained inadequate information concerning the occupation and principal place of business of certain of respondent's contributors.

(b) Respondent answered both requests and informed the Commission that it had undertaken what it considered its best efforts to comply with the pertinent reporting requirements. Respondent informed the Commission that its efforts included developing a computerized system of more adequately reporting the required occupation and principal place of business data as well as implementing an automatic follow up procedure. This system became operational in the fall of 1977.

(c) Respondent has not amended the above-cited reports with respect to occupation and principal place of business which are the subject matter of the instant Matter Under Review.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 434(b)(2), a political committee is required to report the occupation and principal place of

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business for every contributor who contributes to that committee more than \$100 in the aggregate during the calendar year.

II. Respondent, as it has been notified by the Commission by letter dated March 29, 1978, inadequately reported the occupation and principal place of business on its September 1976 monthly report and on its 1976 year-end report for certain of its contributors who contributed more than \$100 in the aggregate, although it was and is the policy of respondent to request that information when soliciting its contributors. Respondent also inadequately reported the same information in its other 1975 and 1976 reports.

III. Although respondent believes (a) that its reporting of occupation and principal place of business in 1975 and 1976 and its development of its computerized reporting and follow-up system which is now operational complied with the Commission's best efforts standard, and (b) that the September 1976 monthly report and the 1976 year-end report were the only reports cited by the Commission in the Commission's notification letter dated March 29, 1978 as being deficient, respondent hereby agrees to contact its contributors for 1975 and 1976 for which occupation and/or principal place of business were reported inadequately in an effort to obtain such information. Respondent will report such information received on amended reports to be submitted to the Commission within 60 days of the signing of this

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agreement. Respondent will furnish to the Commission, within 30 days of the signing of this agreement, evidence of its efforts to obtain the above-mentioned information.

IV. Respondent will comply with the provisions of 2 U.S.C. § 434(b)(2) and the best efforts standard referenced in 2 U.S.C. § 434(b)(4) and 11 C.F.R. § 102.9(e) on all future reports to the Commission.

GENERAL CONDITIONS

I. The Commission, shall on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1), concerning the matters at issue herein, or on its own motion, review compliance with this Conciliation Agreement. If the Commission believes that this Conciliation Agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A) and that this Conciliation Agreement, unless violated, shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Conciliation Agreement.

III. It is mutually agreed that this Conciliation Agreement will become effective upon approval by the Commission and after execution by both parties.

\_\_\_\_\_  
Date

\_\_\_\_\_  
William C. Oldaker  
General Counsel  
Federal Election Commission

\_\_\_\_\_  
Date

\_\_\_\_\_  
Steven Stockmeyer  
Executive Director  
National Republican Congressional  
Committee

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**BAKER, HOSTETLER, FROST & TOWERS**

818 CONNECTICUT AVE., N.W.

WASHINGTON, D.C. 20006

COMMISSION

78 AUG 2 P 4: 20

William C. Oldaker, Esquire  
General Counsel  
Federal Election Commission  
1325 K Street, N. W.  
Fifth Floor  
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO CHARLES STEELE  
FROM: MARJORIE W. EMMONS *MWE*  
DATE: JULY 31, 1978  
SUBJECT: MUR 501 - Interim Report, undated  
Received in Office of Commission  
Secretary: 7-28-78, 11:40

The above-named document was circulated on a 24 hour no-objection basis at 3:00 p.m. on July 28, 1978.

The Commission Secretary's Office has received no objections to the Interim Report as of 4:00 p.m. this date.

Commissioners Harris, Springer, Staebler, Thomson, and Tiernan have returned their papers by the deadline.

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July 28, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 501

Please have the attached Interim Report on MUR 501 distributed to the Commission.

Thank you.

78040081106

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
The National Republican ) MUR 501  
Congressional Committee )

INTERIM REPORT

On May 17, 1978 the Commission found reasonable cause to believe the National Republican Congressional Committee violated 2 U.S.C. § 434(b)(2) by failing to report the occupation and principal place of business of certain of its contributors. On June 7, 1978 the Commission approved the amended conciliation agreement in this matter, which was mailed to the respondent on June 8, 1978.

The respondent submitted a revised conciliation agreement in late June which this Office examined and further revised. The General Counsel then met with counsel for the respondent to negotiate an acceptable agreement. This Office is now awaiting the second revised conciliation agreement to be proposed by the respondent. An acceptable compromise is expected to result in the very near future.

5/28/78  
Date

  
William C. Oldaker  
General Counsel

73010931107



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20463

July 10, 1978

MEMORANDUM TO: CHARLES STEELE  
FROM: MARJORIE W. EMMONS *MWE*  
SUBJECT: MUR 501 - Interim Report dated 7-6-78  
Received in Office of Commission  
Secretary 7-6-78, 3:41

The above-mentioned document was circulated on a 24 hour no-objection basis at 9:00 a.m., July 7, 1978.

As of 9:30 a.m., this date, no objections have been received in the Office of Commission Secretary to the Interim Report.

79031081108

July 6, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 501

Please have the attached Interim Report on MUR 501  
distributed to the Commission.

Thank you.

78040081109

BEFORE THE FEDERAL ELECTION COMMISSION

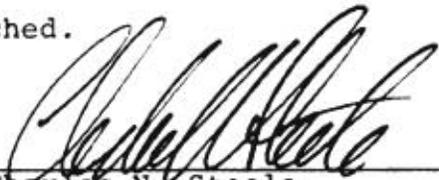
In the Matter of )  
 )  
The National Republican Congressional ) MUR 501  
Committee )  
 )

INTERIM REPORT

On May 17, 1978 the Commission found reasonable cause to believe the National Republican Congressional Committee violated 2 U.S.C. §434(b)(2) by failing to report the occupation and principal place of business of certain of its contributors. On June 7, 1978 the Commission approved the amended conciliation agreement in this matter which was mailed to the respondent on June 8, 1978.

The respondent has submitted a revised conciliation agreement which the Office of General Counsel has reviewed and re-written. This version of the conciliation agreement will be sent shortly to the respondent at which time it is expected that a final conciliation agreement will be reached.

6 July 1978  
Date

  
\_\_\_\_\_  
Charles N. Steele  
Associate General Counsel



FEDERAL ELECTION COMMISSION

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

July 6, 1978

William H. Schweitzer  
Baker, Hostetler, Frost and Towers  
818 Connecticut Ave., N. W.  
Washington, DC 20006

Re: MUR 501

Dear Mr. Schweitzer:

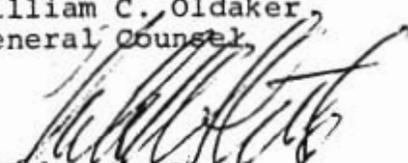
We have received your correspondence of June 23, 1978 and the enclosed Draft Conciliation Agreement.

Upon consideration of your Draft Agreement, we propose the enclosed version as our counter-offer.

Please let us know when you have considered this Agreement.

Sincerely,

William C. Oldaker,  
General Counsel



Charles N. Steele  
Associate General Counsel

Enclosure

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
The National Republican ) MUR 501  
Congressional Committee )

CONCILIATION AGREEMENT

7901008112  
This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that the National Republican Congressional Committee violated 2 U.S.C. § 434(b)(2) by failing to report the occupation and principal place of business of certain of its contributors.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. The Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

A. Respondent received from the Commission requests for additional information dated September 23, 1976, and February 14, 1977, concerning inadequate or omitted occupation and inadequate or omitted principal place of business of contributors on certain of Respondent's

reports of receipts and expenditures.

- 2904003113
- B. Respondent answered both requests and informed the Commission that it had undertaken what it considered to be its best efforts to comply with the pertinent reporting requirements in that Respondent was developing a computerized system capable of more adequately reporting the required occupation and principal place of business data on future reports as well as implementing an automatic follow-up procedure. This system became operational in the fall of 1977.
  - C. During the course of the audit of the National Republican Congressional Committee, Respondent discussed with Commission's auditors the omission of occupation and principal place of business for certain of Respondent's contributors from many of Respondent's disclosure reports for 1975 and 1976 at which time Respondent was told it must make efforts to furnish this missing information.
  - D. Respondent has not filed amendments for any of its 1975 and 1976 reports disclosing the omitted occupation and principal place of business information.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 434(b)(2), a political committee is required to report the occupation and principal place of business for every contributor who contributes to that committee \$100 or more aggregate during the calendar year.

II. Respondent omitted or inadequately reported the occupation and principal place of business for certain of its contributors who contributed \$100 or more in the aggregate to the National Republican Congressional Committee in 1975 and 1976 in violation of 2 U.S.C. § 434(b)(2) although it was and is the policy of Respondent to request that information when soliciting its contributors.

III. Respondent will contact its contributors for 1975 and 1976 for which no occupation and/or principal place of business were reported in an effort to obtain such information. Respondent will report such information received on amended reports to be submitted to the Commission within 60 days of the signing of this agreement. Respondent will furnish to the Commission, within 30 days of the signing of this agreement, evidence of its efforts to comply with this condition of the Conciliation Agreement.

IV. Respondent will comply with the provisions of 2 U.S.C. § 434(b)(2) on all future reports of the Commission or show best efforts to do so.

General Conditions

I. The Commission shall, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1), concerning the matters at issue herein, or on its own motion, review compliance with this Agreement. If the Commission believes that this Agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement, unless violated, shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

\_\_\_\_\_  
Date

\_\_\_\_\_  
William C. Oldaker  
General Counsel  
Federal Election Commission

\_\_\_\_\_  
Date

\_\_\_\_\_  
Steven Stockmeyer  
Executive Director  
National Republican Congressional  
Committee

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NAN

BAKER, HOSTETLER, FROST & TOWERS

COUNSELLORS AT LAW  
818 CONNECTICUT AVE., N.W.  
WASHINGTON, D. C. 20006

WRITER'S DIRECT DIAL NO.:

(202) 857- 1531

(202) 857-1500

IN CLEVELAND, OHIO  
BAKER, HOSTETLER & PATTERSON  
1956 UNION COMMERCE BUILDING  
CLEVELAND, OHIO 44115  
(216) 881-0200  
TWX 810 421 8375

June 23, 1978

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

Re: Matter Under Review 501

Dear Mr. Oldaker:

Pursuant to our discussions at the meeting held in your office on June 13, 1978, enclosed is a copy of a draft Conciliation Agreement prepared by me for the National Republican Congressional Committee in Matter Under Review 501. Please give me a call when you have had an opportunity to review this Conciliation Agreement.

Very truly yours,

*William H. Schweitzer*  
William H. Schweitzer

WHS:gh  
Encl.

cc: Steven Stockmeyer  
Claire Lindsay

202 100 3115

DRAFT

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)
	)
The National Republican	)
Congressional Committee	)
	)
Respondent	)
	)

MUR 501

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission ("Commission") in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Respondent National Republican Congressional Committee violated 2 U.S.C. § 434(b)(2) by omitting or inadequately reporting the occupation and principal place of business of certain of its contributors on its September 1976 monthly report and on its 1976 year-end report.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

- I. The Commission has jurisdiction over Respondent and the subject matter in the case.
- II. Respondent enters voluntarily into this agreement with the Commission.

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III. The pertinent facts in this matter are as follows:

(a) Respondent received from the Commission requests for additional information dated September 23, 1976 and February 14, 1977. These requests informed respondent that its monthly report for September, 1976 and its 1976 year end report, respectively, omitted or contained inadequate information concerning the occupation and principal place of business of certain of respondent's contributors.

(b) Respondent promptly answered both requests and informed the Commission that it had undertaken what it considered its best efforts to comply with the pertinent reporting requirements. 2 U.S.C. § 434(b)(14); 11 C.F.R. § 102.9(e). Respondent informed the Commission that its best efforts included developing a computerized system of more adequately reporting the required occupation and principal place of business data as well as implementing an automatic follow up procedure. This system became operational in the fall of 1977.

(c) Respondent has not amended the above-cited reports with respect to occupation and principal place of business which are the subject matter of the instant Matter Under Review.

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WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 434(b)(2), a political committee is required to report the occupation and principal place of business for every contributor who contributes to that committee more than \$100 in the aggregate during the calendar year.

II. Respondent inadequately reported the occupation and principal place of business on its September 1976 monthly report and on its 1976 year-end report for certain of its contributors who contributed more than \$100 in the aggregate, although it was and is the policy of respondent to request that information when soliciting its contributors.

III. Although respondent believes (a) that its reporting of occupation and principal place of business in 1975 and 1976 and its development of its computerized reporting and follow-up system which is now operational complied with the Commission's best efforts standard, 2 U.S.C. § 434(b)(4); 11 C.F.R. § 102.9(e), and (b) that the September 1976 monthly report and the 1976 year-end report were the only reports cited by the Commission as being deficient, respondent hereby agrees to contact its contributors for 1975 and 1976 in those instances where occupation and/or principal place of business were reported inadequately in an effort to obtain such information.

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Respondent will report such information received on amended reports to be submitted to the Commission within 60 days of the signing of this agreement. Respondent will furnish to the Commission, within 30 days of the signing of this agreement, evidence of its efforts to obtain the above-mentioned information.

IV. Respondent will comply with the provisions of 2 U.S.C. § 434(b)(2) and the best efforts standard referenced in 2 U.S.C. § 434(b)(4) and 11 C.F.R. § 102.9(e) on all future reports to the Commission.

WHEREFORE, the Commission and Respondent mutually agree that:

I. The Commission, shall on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1), concerning the matters at issue herein, or on its own motion, review compliance with this Conciliation Agreement. If the Commission believes that this Agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

II. This Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A) and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to Matter Under Review 501 and the matters set forth in this Agreement.

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III. This Conciliation Agreement will become effective on the date that respondent and the General Counsel of the Commission have executed said Conciliation Agreement and said Conciliation Agreement has been approved by the Commission.

\_\_\_\_\_  
Date

\_\_\_\_\_  
William C. Oldaker  
General Counsel  
Federal Election Commission

\_\_\_\_\_  
Date

\_\_\_\_\_  
Steven Stockmeyer  
Executive Director  
National Republic Congressional  
Committee

\_\_\_\_\_  
Date

APPROVED: \_\_\_\_\_  
Federal Election  
Commission

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**BAKER, HOSTETLER, FROST & TOWERS**

**818 CONNECTICUT AVE., N.W.**

**WASHINGTON, D.C. 20006**

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Ms. Claire Lindsay  
Federal Election Commission  
1325 K Street, N. W.  
Washington, D. C. 20463

**BAKER, HOSTETLER, FROST & TOWERS**

818 CONNECTICUT AVE., N.W.

WASHINGTON, D.C. 20006

78040081123

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



FEDERAL ELECTION COMMISSION

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

June 8, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Steven Stockmeyer  
Executive Director  
National Republican Congressional Committee  
512 House Office Bldg. Annex  
Washington, DC 20515

Re: MUR 501

Dear Mr. Stockmeyer:

On May 17, 1978, the Federal Election Commission found reasonable cause to believe that the National Republican Congressional Committee violated 2 U.S.C. §434(b)(2) by failing to report the occupation and principal place of business of certain of its contributors.

Please be advised that the Commission has a duty to make every endeavor for a period of not less than 30 days to correct such a violation by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. §437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit. 2 U.S.C. §437g(a)(5)(B).

Enclosed please find a conciliation agreement which this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the

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provisions of this agreement, please sign it and return it to the Commission within ten days of your receipt of this letter. If not, please contact Clare Lindsay at 202-523-4040 to discuss your objections to the agreement.

Sincerely,

William C. Oldaker  
General Counsel

Enclosure

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CL 501 ✓

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

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

2. ARTICLE ADDRESSED TO:  
*Mr. Steven Stockmayer*

3. ARTICLE DESCRIPTION:  
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.  
 | *993020* | |

(Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE  Addressee  Authorized agent  
*W. J. [Signature]*

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE

POSTMARK: JUN 1 1978

CLERK'S INITIALS

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
The National Republican ) MUR 501  
Congressional Committee )

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that the National Republican Congressional Committee violated 2 U.S.C. § 434(b)(2) by failing to report the occupation and principal place of business of certain of its contributors.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. The Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

A. Respondent received from the Commission requests for additional information dated September 23, 1976, and February 14, 1977, concerning inadequate or omitted occupation and inadequate or omitted principal place of business of contributors on certain of Respon-

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dent's reports of receipts and expenditures.

- B. During the course of the audit of the National Republican Congressional Committee, Respondent discussed with Commission's auditors the omission of occupation and principal place of business for certain of Respondent's contributors from Respondent's disclosure reports for 1975 and 1976 at which time Respondent was told it must make efforts to furnish this missing information.
- C. Respondent has not filed amendments for any of its 1975 and 1976 reports disclosing the omitted occupation and principal place of business information (occupation was omitted for approximately 57.5% of all itemized contributors and principal place of business was omitted for approximately 73.9% of all itemized contributors).

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 434(b)(2), a political committee is required to report the occupation and principal place of business for every contributor who contributes to that committee \$100 or more aggregate during the calendar year.

II. Respondent failed to report the occupation and principal place of business for certain of its contributors who contributed \$100 or more in the aggregate to the National Republican Congressional Committee in 1975 and 1976 in violation of 2 U.S.C. § 434 (b)(2).

23910081127

III. Respondent will pay a civil penalty in the amount of Eight Hundred (\$800) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

IV. Respondent will contact its contributors for 1975 and 1976 for which no occupation and/or principal place of business were reported in an effort to obtain such information. Respondent will report such information received on amended reports to be submitted to the Commission within 60 days of the signing of this agreement. Respondent will furnish to the Commission, within 30 days of the signing of this agreement, evidence of its efforts to comply with this condition of the Conciliation Agreement.

V. Respondent will comply with the provisions of 2 U.S.C. § 434(b)(2) on all future reports to the Commission.

General Conditions

I. The Commission shall, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1), concerning the matters at issue herein, or on its own motion, review compliance with this Agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
The National Republican )  
Congressional Committee )

MUR 501

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on June 7, 1978, the Commission approved by a vote of 5-0 the amended Conciliation Agreement in the above-captioned matter attached to the memorandum from the General Counsel dated June 2, 1978.

Commissioners Aikens, Tiernan, Thomson, Harris and Staebler returned their votes by the deadline.

*Marjorie W. Emmons*

Marjorie W. Emmons  
Secretary to the Commission

Date: 6-7-78

7971078150

Received in Office of Commission Secretary: 6-2-78, 1:23  
Circulated on 48 hour vote basis: 6-5-78, 10:30

BEFORE THE FEDERAL ELECTION COMMISSION

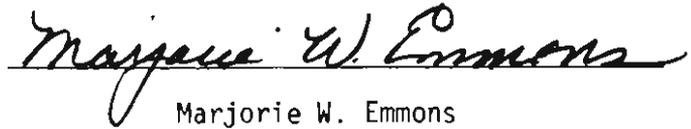
In the Matter of )  
The National Republican )  
Congressional Committee )

MUR 501

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on June 7, 1978, the Commission approved by a vote of 5-0 the amended Conciliation Agreement in the above-captioned matter attached to the memorandum from the General Counsel dated June 2, 1978.

Commissioners Aikens, Tiernan, Thomson, Harris and Staebler returned their votes by the deadline.



Marjorie W. Emmons  
Secretary to the Commission

Date: 6-7-78

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Received in Office of Commission Secretary:  
Circulated on 48 hour vote basis:

6-2-78, 1:23  
6-5-78, 10:30

June 2, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 501

Please have the attached memo and conciliation agreement in MUR 501 distributed to the Commission on a 48 hour tally basis.

Thank you.

78040081132



FEDERAL ELECTION COMMISSION

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

June 2, 1978

MEMORANDUM

TO: THE COMMISSION

FROM: WILLIAM C. OLDAKER *W.C. Oldaker*

RE: MUR 501

On May 17, 1978 the Commission voted to find reasonable cause to believe the National Republican Congressional Committee violated 2 U.S.C. §434(b)(2) by failing to report the occupation and principal place of business of certain of its contributors. The Commission further voted to send the letter and Conciliation Agreement attached to the General Counsel's Report subject to the amendment of the Conciliation Agreement.

An amended Conciliation Agreement is attached and re-circulated for your approval. The amendments consist primarily of the addition of Sections IV and V to the specific conditions of the Agreement.





BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
National Republican ) MUR 501  
Congressional Committee )

GENERAL COUNSEL'S REPORT

Summary of Allegations and Commission Action:

This MUR resulted from findings made during the course of the audit of the National Republican Congressional Committee, ("the NRCC"). The auditors found the Committee was not adequately reporting the occupation and principal place of business of certain of its contributors who gave in excess of \$100 aggregate per year.

On March 21, 1978, the Commission voted to accept the General Counsel's recommendation to find reason to believe the National Republican Congressional Committee had failed to provide occupation and principal place of business for certain of its contributors, in violation of 2 U.S.C. §434(b)(2).

Facts:

On September 23, 1976, the NRCC received a request for additional information ("RFAI") from the Commission pertaining to the occupation and principal place of business of certain of its contributors not reported on the NRCC's reports of receipts and expenditures covering the period August 1, 1976 through August 31, 1976. The Committee replied that its "best efforts" were being exercised to obtain the required information and that when this additional data became available the appropriate reports would be amended. This response was considered adequate enough by the Reports Analysis Division to allow the Committee more time

to send in amendments. A second RFAI was not sent.

On February 14, 1977, an RFAI was sent to the Committee, this time regarding the NRCC's year-end 1976 report. The Committee replied in March that occupations which were omitted from the NRCC's reports indicated that the Committee had not received that information from its contributor, but that when this information was provided it was reported. Regarding principal place of business, the Committee was in the process of developing a computer program which could report this information. In the meantime, according to the Committee, this information was available to Commission officials upon request.

At this time a member of the Reports Analysis Division's staff was told by a representative of the NRCC that, upon completion of the new computer program, occupation and principal place of business would be consistently reported in the future; however, the Committee's 1976 reports would not be amended because the cost of such project would be \$100,000.

The NRCC was told during this conversation that Reports Analysis could not grant a reporting waiver for occupation/principal place of business data on the 1976 reports. According to a Reports Analysis staffer, the NRCC representative seemed to believe that the NRCC would not be required to file amendments. There is no evidence that anyone at the Commission had ever led

him to believe this was permissible.\*

Because the audit of the NRCC had commenced in February of 1977, the Reports Analysis Division, in early April of 1977, discontinued any plans to bring a compliance action against the Committee. The auditors anticipated, at that time, making the Committee's reporting deficiencies an audit finding. Again, no follow-up to the February 14th RFAI was sent to the Committee.

During the course of the audit, the auditors conducted a 100% review of the NRCC's itemized contributions through January of 1977 and found that for 57.5% of the itemized contributions no occupation was reported, while for 73.9% of the itemized contributions no principal place of business was reported. When asked what their follow-up procedure was for obtaining the missing information, NRCC representatives replied that a standard solicitation letter was mailed regularly to each contributor and if the occupation and principal place of business (which were requested on the reply coupon) were provided,

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\* On subsequent RFAI's (June 22 and July 29, 1977) the Reports Analysis Division added the following comments to the standard form, "The Commission recognizes your efforts in obtaining this information. However, we must continue to cite these omissions". This comment, as understood by the Reports Analysis Division and the Office of General Counsel, refers to the Committee's efforts to develop a new computer system, not efforts relating to the amendment of disclosure of contributors occupation and principal place of business on 1976 reports.

these items were reported. At the time of the audit, the auditors found no type of follow-up letter which pointed out to a contributor that he had neglected to provide required information and which requested that he promptly furnish it.

The auditors also requested access to the Committee's contributor records. These records were found at the offices of the Committee's hired computer service, unlabeled and in no discernable order. In attempting to test what information these contributor records contained, the auditors chose 101 samples of which 87 contained no occupation or principal place of business information. These same samples were traced back to the reports, where it was found that seven of the contributors with occupation on the contributor records did not have occupation data included on the reports filed with the Commission.

Although the Committee has never received a letter of audit findings, this reporting matter was taken up with the Committee at the audit exit conference. At this time, the Committee was told by the auditors that best efforts must be made to obtain the occupation and principal place of business for contributors on reports submitted up to the time of the audit and that their reporting deficiencies up to the time of the audit would be made an audit finding. The Committee requested a definition of the "best efforts" standard but was told by the auditors that this standard had not been defined.

Now the respondent Committee replies to the Commission's reason to believe notification that the NRCC was given no indication by the Commission that its efforts to comply with the reporting requirements did not meet the "best efforts" standard until the receipt of the letter of notification. The NRCC further

claims that, if the Committee had been aware that they had not made "best efforts", further steps would have been taken to comply.

Analysis:

It is the opinion of this office that the NRCC was aware that its reports for 1976 were not in compliance with the Act's itemization requirements through its receipt of Commission requests for additional information. Further, it is also our opinion that the NRCC was aware that it had not met the "best efforts" standard by virtue of the auditor's suggestion to the Committee during the audit exit conference that the Committee should utilize its best efforts to obtain the occupations and principal place of business for its contributors, implying thereby that this had not already been done.

The Office of General Counsel believes that the NRCC did not make "best efforts" to obtain the required information for its 1976 reports, nor did the Committee intend to do so. We recognize that the Committee has developed a new computer program, at great expense, which has brought its recently filed reports into compliance. But the Committee's failure to comply with the Act's reporting requirements as regards the 1976 reports has not yet been corrected. We see no evidence of and initiative on the part of the Committee to obtain missing information regarding its contributors, much less amend the inadequate reports.

Recommendation:

Find reasonable cause to believe the National Republican Congressional Committee violated 2 U.S.C. §434(b)(2) by failing to report the occupation and principal place of business of certain of its contributors. Send the attached letter and conciliation agreement.

12 May 1978  
Date

  
\_\_\_\_\_  
William C. Oldaker for U.C.C.  
General Counsel

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- B. Respondent discussed the omission of occupation and principal place of business from Respondent's disclosure reports for 1975 and 1976, with Commission's auditors during the course of the audit.
  - C. Respondent has not filed amendments for any of its 1975 and 1976 reports disclosing the omitted occupation and principal place of business information (occupation was omitted for approximately 57.5% of all itemized contributors and principal place of business was omitted for approximately 73.9% of all itemized contributors).

WHEREFORE, Respondent agrees that:

- I. Under 2 U.S.C. §434(b)(2), a political committee is required to report the occupation and principal place of business for every contributor who contributes to that committee \$100 or more aggregate during the calendar year.
- II. Respondent failed to report the occupation and principal place of business for certain of its contributors who contributed \$100 or more in the aggregate to the National Republican Congressional Committee in 1975 and 1976 in violation of 2 U.S.C. §434(b)(2).
- III. Respondent will pay a civil penalty in the amount of Eight Hundred (\$800) Dollars pursuant to 2 U.S.C. §437g(a)(5)(B).

General Conditions

I. The Commission, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1), concerning the matters at issue herein, or on its own motion, review compliance with this Agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. §437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

\_\_\_\_\_  
Date

\_\_\_\_\_  
William C. Oldaker  
General Counsel  
Federal Election Commission

\_\_\_\_\_  
Date

\_\_\_\_\_  
Steven Stockmeyer  
Executive Director  
National Republican Congressional  
Committee



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Steven Stockmeyer  
Executive Director  
National Republican Congressional Committee  
512 House Office Bldg. Annex  
Washington, DC 20515

Re: MUR 501

Dear Mr. Stockmeyer:

On May , 1978, the Federal Election Commission found reasonable cause to believe that the National Republican Congressional Committee violated 2 U.S.C. §434(b)(2) by failing to report the occupation and principal place of business of certain of its contributors.

Please be advised that the Commission has a duty to make every endeavor for a period of not less than 30 days to correct such a violation by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. §437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit. 2 U.S.C. §437g(a)(5)(B).

Enclosed please find a conciliation agreement which this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the

provisions of this agreement, please sign it and return it to the Commission within ten days of your receipt of this letter. If not, please contact Clare Lindsay at 202-523-4040 to discuss your objections to the agreement.

Sincerely,

William C. Oldaker  
General Counsel

Enclosure

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Doc 3373



# National Republican Congressional Committee

512 HOUSE OFFICE BLDG. ANNEX • WASHINGTON, D.C. 20515 • TELEPHONE (202) 225-1800

CHAIRMAN  
Guy Vander Jagt, M.C., Michigan  
EXECUTIVE DIRECTOR  
Steven Stockmayer

April 27, 1978

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

602212

Re: MUR 501

Dear Mr. Oldaker:

This letter is written in response to the letter dated March 29, 1977 which you wrote to Mr. George Olmsted, treasurer of the National Republican Congressional Committee ("NRCC"). The NRCC firmly believes that the Federal Election Commission's ("FEC") finding of reason to believe is unwarranted because the NRCC has never failed to meet the "best efforts" standard in compiling its reports. 2 U.S.C. § 434(b)(2); 11 C.F.R. § 102.9(e). Moreover, a computer system which was created for the NRCC at considerable expense and which is fully operational at the present time gives the NRCC a reporting and follow-up capability superior to any reporting political committee. In this letter, I will outline the steps taken by the NRCC in establishing its reporting system and will demonstrate that the NRCC at all times complied with the "best efforts" standard.

This submission does not constitute the NRCC's right to have "a reasonable opportunity to demonstrate that no action should be taken against it" as provided by 2 U.S.C. § 437g(a)(4). The NRCC believes that procedural due process and the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq., ("Act") mandate that the NRCC is entitled, inter alia, to a hearing before the FEC or a representative appointed by the FEC, the right to present witnesses and to cross examine witnesses presented by the General Counsel's office and the right to file pleadings and exhibits with the FEC itself rather than with the General Counsel's office. Submissions to the General Counsel's office are subjected to a filtering process before the information contained in said submissions is presented to

VICE CHAIRMEN

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James G. Martin, M.C., North Carolina Larry Winn, Jr., M.C., Kansas

William C. Oldaker, Esquire  
April 27, 1978  
Page Two

the FEC. Furthermore, the NRCC invokes its right to maintain the confidentiality of this proceeding pursuant to 2 U.S.C. § 437g(a)(3)(B).

On September 23, 1976, the NRCC received a form letter from Orlando B. Potter, Staff Director of the FEC. See Exhibit 1 attached hereto. This letter, which was the first indication that any of the NRCC's reports were not complete, stated that the NRCC's September, 1976 monthly report was incomplete because the "occupation description" and the "principal place of business" of each contributor of over \$100 in a calendar year was "inadequate or omitted." (Also, the letter indicated that the aggregate year to date totals had been omitted. The NRCC immediately resolved this problem by amending its reports). The NRCC's Legal Counsel promptly responded to Mr. Potter's letter and indicated that the NRCC had exercised its best efforts to supply this information. See Exhibit 2 attached hereto. At the time, the NRCC was reporting the information which it received concerning "occupation" and was compiling and storing the information concerning "principal place of business." The reason this information was not reported was that the NRCC's computer service bureau did not have the capability of compiling and reporting this information for the NRCC's approximately 300,000 contributors. Each contributor was re-solicited approximately every forty days and each solicitation contained a request for the required information. No further communication was received from the FEC concerning the September, 1976 report until March of this year.

On February 14, 1977, the FEC sent another form letter to the NRCC indicating that the reporting of "occupation description" and "principal place of business" on the 1976 year end report was "inadequate or omitted." See Exhibit 3 attached hereto. Again, the NRCC's Legal Counsel promptly responded to the letter and informed the FEC that occupations were reported when they were provided to the NRCC and that the NRCC had instructed its computer service bureau, Wiland & Associates Inc., to create a computer program which would provide the principal place of business information to the FEC. Furthermore, the FEC was informed that this computer program would be operational on May 1, 1977, and until it was put into operation the principal place of business information was available for inspection by the FEC at any time. See Exhibit 4 attached hereto. The

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William C. Oldaker, Esquire  
April 27, 1978  
Page Three

NRCC had over 300,000 contributors in the spring of 1977 (it now has in excess of 500,000 contributors).

Although not referenced in your March 29 letter and, therefore, not a part of MUR 501 because the NRCC has not received proper notification of such violations pursuant to 2 U.S.C. § 437g(a)(2), the NRCC received three additional letters concerning deficiencies in its reports relating to "occupation" and "principal place of business." See Exhibits 5, 6 and 7 attached hereto. These letters, which are dated June 22, 1977, July 29, 1977 and November 23, 1977, referenced the "April 10 Quarterly" report, the "July 10 Quarterly" report and the "October 10 Quarterly" report and "October 10 Quarterly - Amendment", respectively. The NRCC had fully explained its actions and the development of its computer program to the FEC in its responses to the September 23 and February 14 letters. Indeed, the FEC recognized that the NRCC was in the process of developing its extensive computer program because it added the following language to the bottom of page 2 of the June 22 letter and the bottom of Page 2 of the July 29 letter:

The Commission recognizes your efforts in obtaining this information. However, we must continue to cite these omissions.

The NRCC believed that it was unnecessary to respond to these additional letters because the FEC had acknowledged the NRCC's efforts to develop the computer program which is presently in use. Moreover, there was no indication in any of the letters that the NRCC was not in compliance with the "best efforts" standard.

The NRCC assumed that it had satisfied the FEC's inquiries because it did not receive any other communication concerning this subject until the March 29 notification letter. Indeed, the NRCC discussed this matter with representatives of the FEC during 1976 election cycle audit and was not informed that its efforts to comply were inadequate.

In light of the efforts of the NRCC to implement a reporting and follow-up computer program, it was extremely unfair of the FEC to initiate an MUR without further consultation with the NRCC. There was no attempt by the NRCC to hide from the FEC or the public reportable information. The

William C. Oldaker, Esquire  
April 27, 1978  
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difficulty lay in creating a manageable way to collect, store, seek for a second time and finally report the information for up to as many as 300,000 to 400,000 contributors. Obviously, the NRCC's problem was different than the problems confronting a candidate committee in a primary or general election. A system of recording the required information by hand and drafting a follow-up request is not feasible from a time or cost standpoint when a committee is dealing with such a large number of contributors. The only solution was to create a computer program which would compile, store and report the required information and which would also be capable of re-soliciting contributors when the required information was not submitted with the contribution. Wiland & Associates Inc. has perfected such a program at a cost of approximately \$50,000. The system went into partial operation on May 1, 1977, and information concerning occupation and principal place of business was compiled and stored by the computer. The NRCC's July 10, 1977 report was complete as to the identification of the occupation and principal place of business of each contributor who contributed more than \$100 and who provided the required information in that calendar quarter. The follow-up capability was added to the system in the fall of 1977 and the year end report for 1977 was prepared with the complete system in place. This report has been amended to reflect the further information gathered as a result of the follow-up efforts. In addition, the first quarter report for 1978 was also complete and the amendments containing additional information received as a result of the follow-up procedure are in the process of being prepared.

The system is capable of compiling, storing, reporting and making a second request for the information required by § 434(b)(2) when a contributor makes a contribution of \$100 or more. A copy of the follow-up letter is attached hereto as Exhibit 8. If a contributor's contributions in a calendar year aggregate more than \$100.00, the contributor's name, address and total amount of monies contributed is compiled, stored and then reported to the FEC. Upon the completion of the report, the above-mentioned follow-up letter (see Exhibit 8) is sent to this group of contributors whose contributions aggregated more than \$100 during the reporting period. When the responses containing the occupation and principal place of business data have

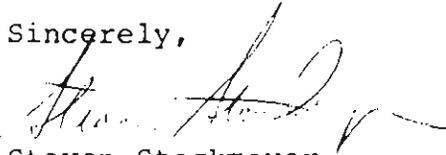
William C. Oldaker, Esquire  
April 27, 1978  
Page Five

been received and compiled, the NRCC's report is amended accordingly.

In sum, the NRCC was given no indication by the FEC that its efforts to comply with the reporting requirements did not meet the "best efforts" standard until the receipt of the March 29, 1978 letter. If such a communication had been received prior to the issuance of the MUR, the NRCC would have taken whatever steps were necessary to comply with the "best efforts" standard. Moreover, the NRCC has made a good faith effort to comply with the spirit and letter of the law by instructing Wiland & Associates Inc. to create the computer program which is now in place. While the Wiland system was being developed, any reportable data in the possession of the NRCC was always available for inspection by representatives of the FEC.

The NRCC believes that it has complied with the "best efforts" standard and that its present system is better than any system used by any other large reporting political committee. As a result, the NRCC respectfully asserts that the finding of reason to believe is totally unjustified and asks the FEC to dismiss MUR 501. Alternatively, the NRCC requests that the FEC inform it what steps it must take in order to meet the "best efforts" standard. (The NRCC is not aware of any action taken by the FEC which would give general guidance as to how the FEC defines "best efforts"). If there had been some staff communication with the NRCC prior to taking this matter formally to the Commissioners, there would have been no reason for the initiation of this administrative proceeding because the NRCC would have willingly, as it has always done, communicated with the staff and responded to any appropriate requests.

Sincerely,

  
Steven Stockmeyer  
Executive Director  
National Republican  
Congressional Committee

6 45117 JTC



## FEDERAL ELECTION COMMISSION

1125 K STREET, N.W.  
WASHINGTON, D.C. 20543

23 September 1976

National Republican Congressional  
Committee  
Mr. George Olmsted, Treasurer  
512 House Office Building Annex #1  
Washington, D. C. 20515

Dear Mr. Olmsted:

This letter is prompted by our interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended.

During review of the September Monthly  
Report of Receipts and Expenditures, we noted that you omitted information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Clerk of the House's Office of Records and Registration, 1036 Longworth ROB, Washington, D.C. 20515 with the missing information within (10) days of receipt of this letter. If you have any questions, please do not hesitate to contact Suzanne Wilson  
(202-382-3484) our Reports Analyst assigned to you.

Sincerely,

Handwritten signature of Orlando B. Potter in cursive.

Orlando B. Potter  
Staff Director

Attachment



REQUEST FOR ADDITIONAL INFORMATION FOR THE September Monthly REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD Aug. 1, 1976 THROUGH Aug. 31, 1976, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

- Coverage dates omitted or incorrect
- Failure to Sign
- Identification Number (Use above FEC I.D.#)
- Incorrect or omitted total(s) on Summary Page Line \_\_\_\_\_ Column \_\_\_\_\_
- Incorrect or omitted total(s) on Detailed Summary Line \_\_\_\_\_ Column \_\_\_\_\_

OMISSION OF REQUIRED DATA ON RECEIPTS AND EXPENDITURES

Schedule Line	A 15	A 16	A 17	A 18	B 20	B 21	B 23	C 25	C 26	D 15
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Schedule totals  do not agree with Detailed Summary (Page 2)  
 Omitted

Dates inadequate or omitted

Full name omitted

Mailing address inadequate or omitted

Occupation description inadequate or omitted

Princpl. pl. bus. inadequate or omitted

Aggregate year-to-date totals omitted

Purpose of expenditure or receipt omitted

Inadequate description of  Proceeds  
 Dates  Event(s) and Location

Nature of debts and obligations omitted or inadequate

OTHER:

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Your initial submission, together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional information promptly with the Clerk of the House, Office of Records and Registration, 103 Longworth Bldg., Washington, DC 20515. If you have any questions regarding this request call the Reports Analysis Section (202/382-3424).

October 5, 1976

Mr. Orlando Potter  
Staff Director  
Federal Election Commission  
1325 K Street, N. W.  
Washington, D. C. 20463

Re: ID# C00002931  
September Monthly Report

Dear Mr. Potter:

This is in response to your letter of September 23, 1976, received by us on September 27. In your letter, you request additional information with respect to the occupations and principal places of business for the Committee's itemized contributors. Attached to this correspondence please find a copy of a letter from our treasurer to the Clerk of the House indicating that best efforts have been and will continue to be made to obtain the information. Our statements and reports will be amended accordingly.

Secondly, you note that aggregate year-to-date totals were omitted from entries on Schedule A, line 18. This was an inadvertent omission. The aggregate totals are the same as the amounts reported for that period. In the future, the identical amounts will be inserted in each column.

Sincerely,

Jan Baran  
Legal Counsel

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# National Republican Congressional Committee

525 HIGLEY CENTER BUILDING • WASHINGTON, D.C. 20005 • TELEPHONE (202) 638-1000

CHIEF OF STAFF  
By: [Name], M.P., Chicago  
EXECUTIVE DIRECTOR  
[Name], Chicago

September 24, 1976

The Honorable Edmund L. Henshaw, Jr.  
Clerk  
U. S. House of Representatives  
Washington, D. C. 20515

Dear Mr. Henshaw:

This is in response to your letter of September 22, 1976, in which you raise two questions with respect to the August 1976 Monthly Report of the National Republican Congressional Committee.

First, you request the original front page of that report which contains my signature. That document is attached to this correspondence. A photocopy was submitted to you inadvertently. Second, you request additional occupations and places of business for contributors itemized on Schedule A. Schedule A is complete to the best of our knowledge. Our Committee has made and will continue to make its best efforts to obtain such information for purposes of our reports. At such time as additional data becomes available to us, we shall provide it to you and the Federal Election Commission by means of amendments.

I sincerely hope that this is dispositive of your inquiry. If not, I would be glad to provide you with any additional information which you may desire.

Very truly yours,

*George Olmsted*  
George Olmsted  
Treasurer

John H. [Name], M.P., [City]

ESTATE AND FINANCE  
[Name] & [Name], M.P., [City]

Miss M. [Name], M.P., [City]

[Name]

[Name]

[Name]

[Name]

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Statement of Candidates or Nominees for  
Senate, House of Representatives, or  
Commission or Election to Federal Office

THIS REPORT IS DUE  
10 SEP 27 1976

Note: Candidates authorized by a candidate to receive contributions and make expenditures in connection with their campaign must file this report with respect to each election.

1. Name of Candidate or Nominee (in full)  
**LEGISLATIVE TRAIL**

2. Campaign Number  
**005118 (1976-09-09-0000)**

3. Is this report of a candidate or authorized  
candidate committee?  Yes  No

4. If "Yes," for which election?  
(General, Primary, Runoff) \_\_\_\_\_ (Date) \_\_\_\_\_

5. Address (number and street)  
**512 HULSE OFFICE BUILDING ANNEX 01**

6. City, State and ZIP code  
**WASHINGTON, D. C. 20515**

4. Type of Report (Check appropriate box and complete, if applicable)

(a)  Amendment (b)  July 10 report

(c)  April 10 Report (d)  October 10 report

(e)  Tenth day report preceding election on \_\_\_\_\_ in the state of \_\_\_\_\_  
(Primary, general or convention) (State)

(f)  Tenth day report following election on \_\_\_\_\_ in the state of \_\_\_\_\_  
(Primary, general or convention) (State)

5.  January 31 Report  
 Alternative Quarterly Report **9/10/76**  
 Termination

E. Reporting Period: From **August 1, 1975** through **August 31, 1975**

Section A - Cash Balance Summary	Change Increased	Change Decreased
6. Cash on hand January 1, 1975		
7. Cash on hand at beginning of reporting period	01,551.00	
8. Add total receipts (from line 10)	01,375,572.33	0 0 0 0 0 0 0 0
(a) Federal	03,300,000.00	0 0 0 0 0 0 0 0
9. Subtract total expenditures (from line 24)	0 050,000.00	0 0 0 0 0 0 0 0
10. Cash on hand at close of reporting period	02,471,123.03	0 0 0 0 0 0 0 0
11. Contributed funds on hand to be reported later (see line 10)		
Section B - Expenditures Subject to Limitation Summary (Candidates and Authorized Candidate Committees Only)		
12. Operating expenditures (from line 20)	0	0
13. List Refunds and Rebates (from line 17)	0	0
14. (a) Expenditures subject to limitation	0	0
(b) Expenditures from prior years subject to limitation		0
(c) Total expenditures subject to limitation		0

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

*George B. ...*  
(Candidate or Treasurer or Candidate)

Note: Submission of false, misleading, or deceptive information may subject the person filing this report to the penalties of 18 U.S.C. 1001.

19760910161848



FEDERAL ELECTION COMMISSION

PB/3

1100 STREET NW  
WASHINGTON, D.C. 20463

February 14, 1977

Mr. George Olmsted, Treasurer  
National Republican Congressional Committee  
512 House Office Building Annex #1  
Washington D.C. 20515

Dear Mr. Olmsted:

This letter is prompted by our interest in assisting House candidates and committees who wish to comply with the Federal Election Campaign Act, as amended.

During review of the Year-End 1976 Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

The Federal Election Commission has the statutory responsibility to review, for compliance purposes, all Federal campaign disclosure documents, including those filed initially with the Clerk of the House. The Office of the Clerk, as an informational service, is notifying filers of errors and omissions found in their preliminary review of documents filed with the Clerk. Such notices are considered "House documents" and are kept confidential by the Clerk. This letter and attached documentation constitute official notification by the Commission of errors and omissions found, and require a written response.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Clerk of the House's Office of Records and Registration, 1036 Longworth HOB, Washington, D.C. 20515 with the missing information within ten (10) days of receipt of this letter. If you have any questions, please do not hesitate to contact Patricia Brown (202-382-3484) our Reports Analyst assigned to you.

Sincerely,

Orlando B. Potter  
Staff Director

Attachment



100404346

FOR ADDITIONAL INFORMATION FOR THE Year-End 1976 REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 11/23/76 THROUGH 12/31/76  
 REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 11/23/76 THROUGH 12/31/76  
 REPORT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

Review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

- Average dates omitted or incorrect
- Failure to Sign
- Identification Number
- Use above FEC I.D.#
- Incorrect or omitted total(s) on Summary Page Line(s) \_\_\_\_\_ Column(s) \_\_\_\_\_
- Incorrect or omitted total(s) on Detailed Summary Line(s) \_\_\_\_\_ Column(s) \_\_\_\_\_

MISSION OF REQUIRED DATA RECEIPTS AND EXPENDITURES	Schedule Line	A	A	A	A	B	B	B	C	C	D	E
		15	16	17	18	20	22	24	26	27	15(c)	
Schedule totals ( ) do not agree with Detailed Summary (Page 2) ( ) Omitted												
Dates inadequate or omitted												
All name omitted												
Home address inadequate or omitted												
Occupation description inadequate or omitted		X										
Occup. pl. bus. inadequate or omitted		X										
Aggregate year-to-date totals omitted												
Purpose of expenditure or receipt omitted												
Inadequate description of ( ) Proceeds ( ) Dates ( ) Event(s) and Location												
Nature of debts and obligations omitted inadequate												

Your initial submission, together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional information promptly with the Clerk of the House, Office of Records and Registration, 1035 Longworth Bldg., Washington, DC 20515. If you have any questions regarding this request, call the Reports Analysis Section (202/382-3484).



# National Republican Congressional Committee

512 HOUSE OFFICE BUILDING • WASHINGTON, D.C. 20515 • TELEPHONE (202) 275-1800

CHAIRMAN  
Guy Vander Jagt, M.C., Michigan  
EXECUTIVE DIRECTOR  
Steven Stockinger

March 14, 1977

Dear Mr. Denier:

This letter is in response to our telephone conversation of March 8, during which time we discussed a letter from Orlando Potter to George Olmstead, Treasurer, dated February 14. That letter requested an explanation for the omission of certain occupations and places of business with respect to itemized contributors on the 1976 year-end report of the National Republican Congressional Committee.

As I stated to you over the phone, and as I have stated previously to Miss Suzanne Wilson of your office, the omission of an occupation for a contributor indicates that he or she has not given our Committee any such information. Occupations are reported when they are provided to us. We have made and will continue to make our best efforts to obtain this data for reporting purposes.

With respect to places of business, I have notified Miss Wilson, repeated to you, and now reiterate in this letter that we have instructed our computer contractor, Wiland & Associates of Culpeper, Va., to create a program, at significant expense to our Committee, which will provide to the Commission and the public the desired information in printout form. We have been told by Wiland that this new program will be operational by May 1 of this year. At such time, this data, when given to us by any of our more than 300,000 contributors, shall be keypunched and maintained by us in order to meet the demands of the federal election laws and the Federal Election Commission. Until that time, this information is available to Commission officials upon request. As in all other matters, this Committee shall exercise its best efforts to obtain the requisite data and report it.

If there are any further questions on this or any other subject, please let me know.

Sincerely,  
  
Jan Baran  
Legal Counsel

Mr. Greg Denier  
Federal Election Commission  
1325 ... N.W.

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## FEDERAL ELECTION COMMISSION

1125 K STREET, N.W.  
 WASHINGTON, D.C. 20543  
 June 22, 1977

George Olmsted, Treasurer  
 National Republican Congressional Committee-Contributions  
 512 House Office Building Annex #1  
 Washington, D.C.  
 20515

Dear Mr. Olmsted:

This letter is prompted by our interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended.

During review of the April 10 Quarterly  
Report of Receipts and Expenditures, we noticed that you omitted  
 information or made apparent mathematical errors in certain entries.  
 Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within (10) days of receipt of this letter. If you have any questions, please do not hesitate to contact David U. Greedy (202-523-4048) our Reports Analyst assigned to you.

Sincerely,

*Orlando B. Potter*

Orlando B. Potter  
 Staff Director

Attachment

12

); National Republican Congressional Committee-Contributions DATE: June 22, 1977

I.D. NO.: C00002931

REQUEST FOR ADDITIONAL INFORMATION FOR THE April 10 Quarterly REPORT OF RECEIPTS  
AND EXPENDITURES COVERING THE PERIOD 2/1/77 THROUGH 3/31/77,  
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please  
return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

Coverage Dates  omitted or  incorrect

Signature  omitted or  incorrect

Summary Page Line(s)  Column(s)  Totals  omitted or  incorrect

Detailed Summary (Page 2) Line(s)  Column(s)  Totals  omitted or  incorrect

Schedule Totals  disagree with Detailed Summary (Page 2) or  omitted

Date(s)  omitted or  inadequate for Schedule(s)  Line(s)

Full Name(s) Omitted for Schedule(s)  Line(s)

Mailing Address(es)  omitted or  inadequate for Schedule(s)  Line(s)

Occupational Descriptions  omitted or  inadequate for Schedule(s)  Line(s) 15 \*

Principal Place(s) of Business  omitted or  inadequate for Schedule(s)  Line(s) 15 \*

Aggregate Year-to-date Totals  omitted or  inadequate for Schedule(s)  Line(s)

Nature or Purpose of Expenditure  omitted or  inadequate for Schedule(s)  Line(s)

Nature or Purpose of Receipt  omitted or  inadequate for Schedule(s)  Line(s)

Inadequate Description of  proceeds  dates  events  location of Schedule

Other: \* ~~The Commission recognizes your efforts in obtaining this information.~~

~~However, we must continue to cite these omissions.~~

Your initial submission(s), together with this request for additional information, has been made available for  
public inspection. The Commission urges you to file the additional submission(s) promptly to the above address.  
If you have any questions regarding this request, please call the Disclosure Division toll free at (800) 424-9530.  
The local Washington, D.C. telephone number is (202) 523-4048.

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St.,  
N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of  
Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.



## FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20463  
July 29, 1977

George Olmsted, Treasurer  
National Republican Congressional Committee-Contributions  
Room 510 HOBA #1  
Washington, D.C.  
20515

Dear Mr. Olmsted:

This letter is prompted by our interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended.

During review of the July 10 Quarterly  
Report of Receipts and Expenditures, we noticed that you omitted information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within (10) days of receipt of this letter. If you have any questions, please do not hesitate to contact David U. Greevy (202-523-4048) our Reports Analyst assigned to you.

Sincerely,

Handwritten signature of Orlando B. Potter in cursive.

Orlando B. Potter  
Staff Director

Attachment

12



FEDERAL ELECTION COMMISSION  
1325 K Street, N.W.  
Washington, D.C. 20463

DG/3

TO: National Republican Congressional Committee- DATE: July 29, 1977  
Contribution:  
I.D. NO.: C00002931

REQUEST FOR ADDITIONAL INFORMATION FOR THE July 10 Quarterly REPORT OF RECEIPTS  
AND EXPENDITURES COVERING THE PERIOD 4/1/77 THROUGH 6/30/77,  
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please  
return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

Coverage Dates  omitted or  incorrect

Signature  omitted or  incorrect

Summary Page Line(s)  Column(s)  Totals  omitted or  incorrect

Detailed Summary (Page 2) Line(s)  Column(s)  Totals  omitted or  incorrect

Schedule Totals  disagree with Detailed Summary (Page 2) or  omitted

Date(s)  omitted or  inadequate for Schedule(s)  Line(s)

Full Name(s) Omitted for Schedule(s)  Line(s)

Mailing Address(es)  omitted or  inadequate for Schedule(s)  Line(s)

Occupational Descriptions  omitted or  inadequate for Schedule(s)  Line(s) 15 \*

Principal Place(s) of Business  omitted or  inadequate for Schedule(s)  Line(s) 15 \*

Aggregate Year-to-date Totals  omitted or  inadequate for Schedule(s)  Line(s)

Nature or Purpose of Expenditure  omitted or  inadequate for Schedule(s)  Line(s)

Nature or Purpose of Receipt  omitted or  inadequate for Schedule(s)  Line(s)

Inadequate Description of  proceeds  dates  events  location of Schedule

Other:  The Commission recognizes your efforts in obtaining this information.

However, we must continue to cite these omissions.

Please See Page Two

Your initial submission(s), together with this request for additional information, has been made available for  
public inspection. The Commission urges you to file the additional submission(s) promptly to the above address.  
If you have any questions regarding this request, please call the Disclosure Division toll free at (800) 424-9530.  
The local Washington, D.C. telephone number is (202) 523-4048.

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St.,  
Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of  
Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20463  
November 23, 1977

George Olmsted, Treasurer  
National Republican Congressional Committee-Contributions  
Room 510, House Office Building Annex #1  
Washington, D.C.  
20515

Dear Mr. Olmsted:

This letter is prompted by our interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended.

October 10 Quarterly &  
October 10 Quarterly-Amendment  
During review of the Report of Receipts and Expenditures, we noticed that you omitted information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within (10) days of receipt of this letter. If you have any questions, please do not hesitate to contact David U. Greevy (200-424-9530) our Reports Analyst assigned to you.

Sincerely,

Orlando B. Potter  
Staff Director

Attachment

12



133:003165

TO: National Republican Congressional Committee- DATE: November 23, 1977

Contributions I.D. NO.: C00002931

October 10 Quarterly-

REQUEST FOR ADDITIONAL INFORMATION FOR THE Amendment REPORT OF RECEIPTS  
AND EXPENDITURES COVERING THE PERIOD 7/1/77 THROUGH 9/30/77,  
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

Coverage Dates  omitted or  incorrect

Signature  omitted or  incorrect

Summary Page Line(s)  Column(s)  Totals  omitted or  incorrect

Detailed Summary (Page 2) Line(s)  Column(s)  Totals  omitted or  incorrect

Schedule Totals  disagree with Detailed Summary (Page 2) or  omitted

Date(s)  omitted or  inadequate for Schedule(s)  Line(s)

Full Name(s) Omitted for Schedule(s)  Line(s)

Mailing Address(es)  omitted or  inadequate for Schedule(s)  Line(s)

Occupational Descriptions  omitted or  inadequate for Schedule(s)  Line(s) 15

Principal Place(s) of Business  omitted or  inadequate for Schedule(s)  Line(s) 15

Aggregate Year-to-date Totals  omitted or  inadequate for Schedule(s)  Line(s)

Nature or Purpose of Expenditure  omitted or  inadequate for Schedule(s)  Line(s)

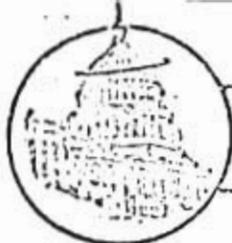
Nature or Purpose of Receipt  omitted or  inadequate for Schedule(s)  Line(s)

Inadequate Description of  proceeds  dates  events  location of Schedule

Other: Please See Page Two

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Disclosure Division toll free at (800) 424-9530. The local Washington, D.C. telephone number is (202) 523-4048.

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# National Republican Congressional Committee

P.O. BOX 1999 • WASHINGTON, D.C. 20013 • TELEPHONE (202) 275-1800

March 1, 1978

Mr. Frank N. Thomas  
143 Kind Drive  
Honolulu, Hawaii 96821

Dear Mr. Thomas:

Thank you very much for your recent contribution to the National Republican Congressional Committee. As Chairman, I can report that it couldn't have come at a better time.

Because of your help, we will be able to continue the extensive campaign programs of electing and re-electing Republicans to the U.S. House of Representatives that I wrote you about. It goes without saying that none of this would be possible without your past support and I am extremely grateful for your help.

However, in reviewing our records of your last contribution, we found them incomplete and I would appreciate it if you could take a moment and print the information needed in the space at the bottom of this letter, and then return the entire letter to me so that we can complete our records. I've enclosed an envelope for your convenience.

If you have any questions about our Committee, please feel free to use the envelope for that too. Thank you again for your help.

Sincerely,

*Guy Vander Jagt*  
Guy Vander Jagt, M.C.  
Chairman

GVJ/lb

The Federal Election Law requires us to request the following information:

Occupation Insurance Agent (Commissioner)

Place of Business 143 Kind Drive, Honolulu, Hawaii

(Please include city and state)

Please check if self employed

96821 THMS143F

78 APR 27 P 6:03

78 APR 28 AM 6:47

FROM:

**National Republican Congressional Committee**  
512 House Office Building Annex  
Washington, D.C. 20515

TO:

FEDERAL ELECTION COMMISSION  
OFFICE OF LEGAL COUNSEL  
attn. Clare Lindsay

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FEDERAL ELECTION COMMISSION

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

April 19, 1978

MEMORANDUM TO: CHARLES STEELE  
FROM: MARJORIE W. EMMONS *mwe*  
SUBJECT: MUR 501 (78) - Interim Report dated 4-14-78  
Received in Office of Commission  
Secretary: 4-14-78, 2:13

The above-mentioned document was circulated to the Commissioners at 10:00 a.m., April 18, 1978, on a 24 hour no-objection basis.

As of 10:00 a.m., this date, no objections have been received in the Office of Commission Secretary to the Interim Report.

Commissioner Staebler commented on the misspelled word in line four of the report. "principle" should be "principal." A copy of his vote sheet is attached.

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April 14, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 501

Please have the attached Interim Report on MUR  
501 distributed to the Commission on a 24 hour no-  
objection basis.

Thank you.

78040081168

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
National Republican ) MUR 501(78)  
Congressional Committee )  
 )

INTERIM REPORT

On March 21, 1978, the Commission found reason to believe the National Republican Congressional Committee violated 2 U.S.C. § 434(b) (2) by failing to provide the occupation and principle place of business of certain of its contributors.

At this time, the Office of General Counsel is still awaiting the response of the National Republican Congressional Committee to the Commission's letter of notification which was delivered on April 3, 1978. A member of the staff has contacted the Committee and was informed that the Committee's response will be in the mail by April 13, 1978.

14 April 1978

DATE

  
\_\_\_\_\_  
William C. Oldaker for UCC  
General Counsel

73710781150

Hand Delivered 7-18-78  
ACC # 3282 akw



# National Republican Congressional Committee

512 HOUSE OFFICE BLDG. ANNEX • WASHINGTON, D.C. 20515 • TELEPHONE (202) 225-1800

**CHAIRMAN**  
Gay Vander Jagt, M.C., Michigan  
**EXECUTIVE DIRECTOR**  
Steven Stockmayer

April 17, 1978

Dear Clare:

Pursuant to our telephone conversation, the National Republican Congressional Committee is preparing its response to the Commission regarding MUR 501.

The Committee hopes to submit its reply to the Commission by the end of this week or certainly by the beginning of next week.

Sincerely,

Tom Josefiak  
Legal Counsel

Ms. Clare Lindsay  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

TJ/aid

**VICE CHAIRMEN**

William L. Armstrong, M.C., Colorado      Trent Lott, M.C., Mississippi  
Lawrence Coughlin, M.C., Pennsylvania      Joel Pritchard, M.C., Washington  
Norman Lent, M.C., New York      John Reusselot, M.C., California

**SECRETARY**

John Paul Hammerschmidt, M.C., Arkansas

**EXECUTIVE COMMITTEE**

Garry Brown, M.C., Michigan      John T. Myers, M.C., Indiana  
J. Herbert Burke, M.C., Florida      Charles Thone, M.C., Nebraska  
David F. Emery, M.C., Maine      David C. Trean, M.C., Louisiana  
Edwin B. Forsythe, M.C., New Jersey      Paul S. Tribble, Jr., M.C., Virginia  
James G. Martin, M.C., North Carolina      Larry Winn, Jr., M.C., Kansas

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331031179

 National Republican Congressional Committee

512 HOUSE OFFICE BLDG. ANNEX • WASHINGTON, D.C. 20515

Ms. Clare Lindsay  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

21003277

STILLWATER MEDICAL ASSOCIATES

1509 WEST 8TH

STILLWATER, OKLAHOMA 74074

(405) 372-2620

TIM K. SMALLEY, M. D.

SAM L. EARNEST, M. D.

April 13, 1978

7 8 0 9 1 0 1 1 2 3 4 5 6 7 8 9

Clare Lindsay  
Federal Election Commission  
1325 K Street N.W.  
Washington, D.C. 20463

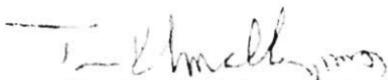
801866

RE: MUR 502 (78)

Dear Mrs. Lindsay,

I called your office, April 11, 1978, and you were out for the day. The ladies told me to write you a letter and point out that Stillwater Medical Associates is not a corporation. We are a simple partnership.

Sincerely,

  
Tim K. Smalley, M.D.

TKS/sc

STILLWATER MEDICAL ASSOCIATES

1509 WEST 2TH

STILLWATER, OKLAHOMA 74074



Clare Lindsay  
Federal Election Commission  
1325 K Street N.W.  
Washington, D.C. 20463

03100317



FEDERAL ELECTION COMMISSION

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

March 29, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

George Olmsted, Treasurer  
National Republican Congressional Committee  
512 House Office Building Annex  
Washington, D. C. 20515

Re: MUR 501

Dear Mr. Olmsted:

This letter is to notify you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has determined that it has reason to believe that a violation of 2 U.S.C. §434(b)(2) has occurred in that your Committee has failed to itemize the occupation and principle place of business of certain contributors, as brought to your attention by the Commission's Disclosure Division on September 23, 1976 and February 14, 1977.

Under 2 U.S.C. §434(b)(2) a committee's reports of receipts and expenditures must disclose the full name, mailing address, occupation and principle place of business of each person who contributes in excess of \$100 aggregate to that committee within the calendar year.

Upon making a determination that there is reason to believe that a violation has occurred, the Commission is required to make an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide evidence of your Committee's efforts to obtain the missing information that the Commission's Disclosure Division has requested of you.



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We would appreciate your response within 10 days of receipt of this letter, as well as any factual or legal materials which you deem relevant to the Commission's investigation of this matter.

This letter of notification shall remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, (telephone number 202-523-4040 or toll free 800-424-9530.)

Sincerely yours,

*William C. Oldaker*

William C. Oldaker  
General Counsel

PS Form 3811, Apr 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

**Mr 501 Lindsay**

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

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

2. ARTICLE ADDRESSED TO:  
**George Olmstead, Treas.  
 Natl Rep Cong Comm**

3. ARTICLE DESCRIPTION:  
 REGISTERED NO. CERTIFIED NO. INSURED NO.  
**943344**

(Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE  Addressee  Authorized agent  
*[Signature]*

4. DATE OF DELIVERY **3/31/78** POSTMARK **MA 02108**

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS **SM**

79040781175

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
National Republican	)	
Congressional Committee	)	MUR 501(78)
	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on March 21, 1978, the Commission accepted the General Counsel's recommendations as follows:

1. Find reason to believe the National Republican Congressional Committee has violated 2 U.S.C. §434 (b)(2) by failing to provide the occupation and principle place of business of certain of its contributors.
2. Send the proposed letter attached to the First General Counsel's Report.

Commissioner Springer recused himself in this matter.

*Marjorie W. Emmons*  
 Marjorie W. Emmons  
 Secretary to the Commission

Date: 3-22-78

Report dated:	3-17-78
Received in Commission Secretary's Office:	3-17-78, 4:08
Circulated on 24 hour no-objection basis:	3-20-78, 4:30

79710781175

March 17, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elisea T. Garr  
SUBJECT: MUR 501

Please have the attached 7 day report on MUR 501 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

78040081177

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION MAR 17 1978

MUR NO. 501  
DATE COMPLAINT RECEIVED  
BY OGC \_\_\_\_\_

ATTORNEY Lindsay

COMPLAINANT'S NAME: Internal (Audit)

RESPONDENT'S NAME: National Republican Congressional Committee

RELEVANT STATUTE: 2 U.S.C. §434(b)(2)

INTERNAL REPORTS CHECKED: Audit findings

FEDERAL AGENCIES CHECKED:

SUMMARY OF ALLEGATIONS

That the National Republican Congressional Committee failed to exercise its best efforts to itemize contributor occupation and principle place of business on contributions in excess of \$100, in violation of 2 U.S.C. § 434(b)(2).

PRELIMINARY LEGAL ANALYSIS

During the course of auditing the National Republican Congressional Committee, ("the Committee"), the auditors found the Committee was not consistently reporting the occupation and principle place of business of contributors giving in excess of \$100 per year as required by 2 U.S.C. § 434 (b)(2). The audit staff estimated, on the basis of a 100% review of contributions, that no occupation was reported for 57.5% of contributors and no principle place of business was reported for 73.9% of contributors.

Furthermore, the Committee had no follow-up procedure to obtain missing information.

Requests for additional information were made to the Committee by the Disclosure Division in September, 1976 and February, 1977. No response was received other than that the Committee was incapable of providing the information omitted on the 1975 and 1976 reports without entailing great expense and that their computer is being programmed now to store this information for future disclosure.

This case was originally handled by the Disclosure Division but, when the audit was initiated, Disclosure discontinued compliance action pending the Committee's inability to provide the required information being made part of the audit findings.

RECOMMENDATION

Find reason to believe the National Republican Congressional Committee has violated 2 U.S.C. § 434(b)(2) by failing to provide the occupation and principle place of business of its contributors. Send attached letter.

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*Browning*  
A-170

MUR 501



FEDERAL ELECTION COMMISSION

1325 K STREET NW  
WASHINGTON, D.C. 20463

February 15, 1978

MEMORANDUM

TO: WILLIAM C. OLDAKER  
THROUGH: ORLANDO B. POTTER *OBP*  
FROM: *RFK* BOB COSTA/JOANNE MCSORLEY *JMS*  
SUBJECT: AUDIT REPORT OF THE NATIONAL REPUBLICAN  
CONGRESSIONAL COMMITTEE

On October 25, 1977, the Audit Division received a legal analysis from your office on the National Republican Congressional Committee audit report (copy attached). The analysis indicated that an audit finding concerning the non-reporting of occupation and principal place of business for contributors contributing in excess of \$100 was under consideration for possible compliance treatment. To date, the Audit Division has not been notified that a MUR has been initiated. Please inform the Audit Division of the course of action being taken on this matter so that it can be appropriately noted in the final audit report.

If you have any questions, please contact Joanne McSorley or Ray Lisi at Extension 3-4155.

Attachment as stated



730400319100



to make a "contribution" as defined by the Act. Accordingly, we recommend that the Committee not be required to report or repay the fair market value of its free Government office space and furnishings.

The audit report further states that the Committee is not reporting the occupation and principal place of business of contributors in excess of \$100 during a calendar year, as required by 2 U.S.C. §434(b)(2). Upon our request to the audit staff for the approximate percentage of the Committee's reported contributors which did not have this information, we understand that a 100% review was undertaken, which disclosed the following percentages of non-reported information: in the case of contributor occupation, 57.5%; in the case of principal place of business, 73.9%. (We suggest that these figures be included in the audit report.) If required contributor information was not received, the Committee did not request the contributor to supply the missing information, by letter or any other manner. The determination of the Audit Division is that the Committee is not using its best efforts to obtain the missing information, and therefore it is recommended that the Committee send follow-up letters requesting the missing information, and file amended reports containing the information received. This Office does not believe the Committee has made any efforts at all, much less the "best efforts" required by 2 U.S.C. §434(b), to obtain and report the required contributor information. This matter is under consideration by our enforcement section for possible compliance treatment.

In the case of the non-itemization of expenditures over \$100 and the non-reporting of petty cash funds as cash on hand, we concur in the recommendations of the Audit Division that, since the Committee has filed amended reports correcting these errors, no further action is necessary.

We believe that the existence of a compliance matter involving the Committee (MUR 306(76)) should be noted in the audit report, perhaps under the category of "Other Matters".

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during the course of the audit, it was determined that the Committee is provided office furniture and quarters in Cannon House Office Building, Annex #1 at no cost. Providing services of this nature would normally constitute a contribution in-kind to the Committee from the organization owning or occupying the building.

Recommendation

The staff recommends that the Committee be required to assign a reasonable value to the use of this office space and furnishings for the period January 1, 1975 until the time of relocation and report it as a contribution in-kind in accordance with Section 434(b)(2) of the Act or compensate the contributor in an amount equal to the assigned value.

~~6~~ (c) Occupation and Principal Place of Business Not Reported

Section 434(b)(2) of Title 2 United States Code requires that a committee report the full name and mailing address (occupation and principal place of business, if any) of each person who has made one or more contributions to or for such committee within the calendar year in an aggregate amount in excess of \$100.00.

A review of contributor records and reports filed by the Committee reveals that occupation and principal place of business are not being disclosed as required by the Act. The Committee explained that all solicitation material requested occupation and principal place of business. When a contributor did not provide the information, a follow-up letter was not sent requesting the missing information. Committee officials explained that the contributor would be solicited again in the future using the same type of solicitation form. In addition, the Committee's computer program at the time of the audit did not provide a position for principal place of business but they indicated it would be programed to include it as of May 1, 1977.

Recommendation

Based on this information it is our determination that the Committee is not using its best efforts to obtain the missing information. We recommend that the Committee send follow up letters to the contributors requesting the missing information and file amended reports to include the information received.

1000814B-1



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

George Olmsted, Treasurer  
National Republican Congressional Committee  
512 House Office Building Annex  
Washington, D. C. 20515

Re: MUR 501

Dear Mr. Olmsted:

This letter is to notify you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has determined that it has reason to believe that a violation of 2 U.S.C. §434(b)(2) has occurred in that your Committee has failed to itemize the occupation and principle place of business of certain contributors, as brought to your attention by the Commission's Disclosure Division on September 23, 1976 and February 14, 1977.

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Upon making a determination that there is reason to believe that a violation has occurred, the Commission is required to make an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide evidence of your Committee's efforts to obtain the missing information that the Commission's Disclosure Division has requested of you.



We would appreciate your response within 10 days of receipt of this letter, as well as any factual or legal materials which you deem relevant to the Commission's investigation of this matter.

This letter of notification shall remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, (telephone number 202-523-4040 or toll free 800-424-9530.)

Sincerely yours,

William C. Oldaker  
General Counsel



FEDERAL ELECTION COMMISSION

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

February 15, 1978

MEMORANDUM

TO: WILLIAM C. OLDAKER

THROUGH: ORLANDO B. POTTER *OBP*

FROM: *RK* BOB COSTA/JOANNE MCSORLEY *mc*

SUBJECT: AUDIT REPORT OF THE NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE

7 9 0 4 0 8 1 8 7

On October 25, 1977, the Audit Division received a legal analysis from your office on the National Republican Congressional Committee audit report (copy attached). The analysis indicated that an audit finding concerning the non-reporting of occupation and principal place of business for contributors contributing in excess of \$100 was under consideration for possible compliance treatment. To date, the Audit Division has not been notified that a MUR has been initiated. Please inform the Audit Division of the course of action being taken on this matter so that it can be appropriately noted in the final audit report.

If you have any questions, please contact Joanne McSorley or Ray Lisi at Extension 3-4155.

Attachment as stated





FEDERAL ELECTION COMMISSION

1125 K STREET, N.W.  
WASHINGTON, D.C. 20463

October 25, 1977

MEMORANDUM

TO: The Commission

FROM: Orlando B. Potter *O.B.P.*

FROM: William C. Oldaker *W.C.O.*

SUBJECT: Audit Report of the National Republican  
Congressional Committee

The Office of General Counsel has reviewed the report by the Audit Division concerning an audit of the National Republican Congressional Committee conducted pursuant to 2 U.S.C. §438(a)(8), and has the following comments on the matters discussed therein.

The audit disclosed a Committee checking account called PEACE (Republican Extra Assistance for Communications Help) which expended almost \$300,000 during 1975, most of which was to defray recording service expenses for Republican members of the House of Representatives. The activities of the PEACE account were not included in the Committee's reports filed in 1975, although the Committee has now filed amended reports (in May of 1977) which contain this information. While we concur in the recommendation of the Audit Division that no further action is required, we believe that the Committee's failure to report such a large amount of financial activity in a timely manner is of potential seriousness, and this matter should therefore be noted in the cover letter to the Committee which will accompany the audit report.

The report states that during the period covered by the audit the Committee was provided free office space and furnishings in a Government office building which it did not report as an in-kind contribution; the Audit Division recommends that the Committee either report the fair market value of the space and furnishings, or reimburse the contributor in this amount. With this situation before it, the Commission determined on September 22, 1977 that the Federal Government did not have the capacity



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to make a "contribution" as defined by the Act. Accordingly, we recommend that the Committee not be required to report or repay the fair market value of its free Government office space and furnishings.

The audit report further states that the Committee is not reporting the occupation and principal place of business of contributors in excess of \$100 during a calendar year, as required by 2 U.S.C. §434(b)(2). Upon our request to the audit staff for the approximate percentage of the Committee's reported contributors which did not have this information, we understand that a 100% review was undertaken, which disclosed the following percentages of non-reported information: in the case of contributor occupation, 57.5%; in the case of principal place of business, 73.9%. (We suggest that these figures be included in the audit report.) If required contributor information was not received, the Committee did not request the contributor to supply the missing information, by letter or any other manner. The determination of the Audit Division is that the Committee is not using its best efforts to obtain the missing information, and therefore it is recommended that the Committee send follow-up letters requesting the missing information, and file amended reports containing the information received. This Office does not believe the Committee has made any efforts at all, much less the "best efforts" required by 2 U.S.C. §434(b), to obtain and report the required contributor information. This matter is under consideration by our enforcement section for possible compliance treatment.

In the case of the non-itemization of expenditures over \$100 and the non-reporting of petty cash funds as cash on hand, we concur in the recommendations of the Audit Division that, since the Committee has filed amended reports correcting these errors, no further action is necessary.

We believe that the existence of a compliance matter involving the Committee (MUR 306(76)) should be noted in the audit report, perhaps under the category of "Other Matters".

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FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 501

Date Filmed 12/19/78 Camera No. --- 2

Cameraman BPC

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FEDERAL ELECTION COMMISSION

1125 K STREET NW  
WASHINGTON, D.C. 20543

THIS IS THE END OF MUR # 501

Date Filmed 4/26/79 Camera No. --- 2

Cameraman SPC



FEDERAL ELECTION COMMISSION

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

March 22, 1979

MEMORANDUM

TO: Bob Costa

THROUGH: Orlando B. Potter  
Staff Director

FROM: William C. Oldaker  
General Counsel *W.C. Oldaker*

RE: National Republican Congressional Committee's  
Compliance with Conciliation Agreement in MUR 501

79040120924

The Office of General Counsel has reviewed the attached amendments submitted by the National Republican Congressional Committee, (NRCC), on March 9, 1979. These amendments reflect the occupation and principal place of business of most of the contributors listed. NRCC has also shown the staff a voucher representing the Committee's order for mailing over 5,000 letters requesting occupation and principal place of contributors. We have requested a copy of this letter for our files.

We are satisfied that the NRCC has now shown best effortst to comply with the Commission's requests in the conciliation agreement signed in MUR 501.

501 300# 9598



# National Republican Congressional Committee

512 HOUSE OFFICE BLDG. ANNEX • WASHINGTON, D.C. 20515 • TELEPHONE (202) 225-1000

79 MAR 15 PM 12:25

CHAIRMAN  
Ray Vander Jagt, M.C., Michigan  
EXECUTIVE DIRECTOR  
Dennis Strohbecker

901510

March 13, 1979

Ms. Claire Lindsey  
Federal Election Commission  
1325 K St. NW  
Washington, DC 20463

Dear Ms. Lindsey:

Attached please find a copy of the National Republican Congressional Committee purchase order #2162 and Wiland & Associates invoice #19528. This purchase order details the selection process for the additional information mailing sent by the National Republican Congressional Committee as per the conciliation agreement of MUR 501. Wiland & Associates invoice #19528 is the billing for the execution of purchase order #2162.

Sincerely,

Tom Josefiak  
Legal Counsel

TJ/vt

Two attachments

VICE CHAIRMEN

William I. Armstrong, M.C., Colorado      Trent Lott, M.C., Mississippi  
Lawrence Coughlin, M.C., Pennsylvania      Joel Pritchard, M.C., Washington  
Norman Lent, M.C., New York      John Rousselot, M.C., California

SECRETARY

John Paul Hammerschmidt, M.C., Arkansas

EXECUTIVE COMMITTEE

Garry Brown, M.C., Michigan      John T. Myers, M.C., Indiana  
J. Herbert Burke, M.C., Florida      Charles Thone, M.C., Nebraska  
David F. Emery, M.C., Maine      David C. Treen, M.C., Louisiana  
Edwin S. Forsythe, M.C., New Jersey      Paul S. Tribble, Jr., M.C., Virginia  
James C. Martin, M.C., North Carolina      Larry Winn, Jr., M.C., Kansas

NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE

02162

512 HOUSE OFFICE ANNEX # 1  
WASHINGTON, D. C. 20515  
225-1800

TO

Wiland & Associates  
219 East Davis Street  
Culpeper, VA 22701

SHIP TO

HOLD

PLEASE ENTER OUR ORDER FOR THE FOLLOWING:

DATE REQUIRED A.S.A.P.	SHIP VIA	ATTACH SAMPLE (PLEASE CIRCLE) YES NO	ACCOUNT NO. 4100096000	ORDER DATE 7/5/78
QUANTITY 040120936	DESCRIPTION <p><u>Instructions</u> - <i>Hold tape for further instructions when this is to be done</i></p> <p>Select from our Master File all records that would have been reported on our 1975 or 1976 Clerk of the House Report.</p> <p>This would be all records with one single gift of over \$100 or multiple gifts, within 1975 or 1976, which aggregate over \$100.</p> <p><b>requested</b></p> <p>Please consolidate all duplicates.</p> <p>Hold tape for further instructions.</p> <p>Approximate cost</p>		UNIT COST	AMOUNT \$300 00

*[Handwritten Signature]*  
AUTHORIZED SIGNATURE

ACCOUNTING

PURCHASE ORDER

INVOICE NUMBER 11-73	ACCOUNT NO. 50	CUSTOMER SALES 02152	DATE November 13, 1978	INVOICE NO. 19528
-------------------------	-------------------	-------------------------	---------------------------	----------------------

BILL TO National Republican Congressional Committee 512 House Office Building Annex Washington, D. C. 20515 Attention: Bruce McCrearty	BILL TO Sick Mailing Service 9800 George Palmer Avenue Lanham, Maryland 20801
---	--

## INVOICE

DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	AMOUNT
Continuing Programming Modify existing program to select 1975 and 1976 Clerk's records with missing information from RCC Master File	1.50 hrs.	15.00/hr.	\$ 22.50	
Computer Time for Assembly and Test	.20 hrs.	70.00/hr.	14.00	
Designated records Process input records	430,594	.31/M	133.49	
Process output records - over \$100 1975-1976 with incomplete Occupation/Business address Data	5,349	.84/M	4.49	

7904012

*McCrearty*  
11/28

TERMS: NET 30 DAYS      TOTAL: \$174.47

PAID 11/29/78      176.98

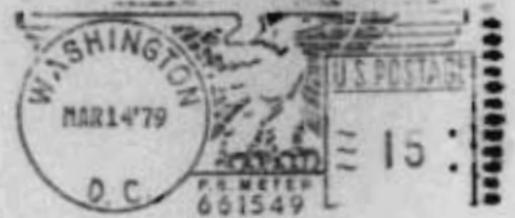
National Republican Congressional Committee

512 HOUSE OFFICE BLDG ANNEX • WASHINGTON, D.C. 20515



79 MAR 15 PM 12:21

RECEIVED  
FEDERAL ELECTION  
COMMISSION



Ms. CLAIRE LINOSEY  
FEDERAL ELECTION COMM.  
1325 K ST. NW  
WASH DC 20463

5751



# National Republican Congressional Committee

312 HOUSE OFFICE BLDG. ANNEX • WASHINGTON, D.C. 20515 • TELEPHONE (202) 225-1800

CHAIRMAN  
Guy Vander Jagt, M.C., Michigan  
EXECUTIVE DIRECTOR  
Steven Stockmeyer

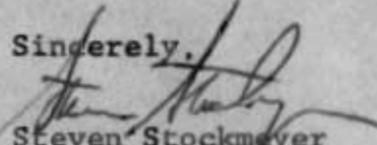
November 29, 1978

Dear Mr. Oldaker:

As was agreed upon in the Conciliation Agreement of MUR 501, effective on November 1, 1978, the National Republican Congressional Committee (NRCC) is submitting evidence of our efforts to obtain the occupations and/or principal place of business missing from our 1975 and 1976 Federal Election Reports. This report specifically responds to that portion of the agreement which reads, "Respondent will furnish to the Commission, within 30 days of the signing of this agreement, evidence of its efforts to obtain the above-mentioned information."

Attached is a sample of the letter we have sent to over 5,000 1975 and 1976 contributors to the NRCC. These individuals were selected from our files on the criteria of: 1) they contributed a single contribution of over \$100 or multiple contributions aggregating over \$100 during either 1975 or 1976; and 2) their occupation and/or principal place of business were missing.

Also enclosed with the letter was a postage paid return envelope for their convenience. We will report such information received on amended reports to the Commission as agreed in the Conciliation Agreement.

Sincerely,  
  
Steven Stockmeyer  
Executive Director

Mr. William Oldaker  
General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C.

VICE CHAIRMEN

William L. Armstrong, M.C., Colorado      Trent Lott, M.C., Mississippi  
Lawrence Coughlin, M.C., Pennsylvania      Joel Pritchard, M.C., Washington  
Norman Lent, M.C., New York      John Rousselot, M.C., California

SECRETARY

John Paul Hammerschmidt, M.C., Arkansas

EXECUTIVE COMMITTEE

Garry Brown, M.C., Michigan      John T. Myers, M.C., Indiana  
J. Herbert Burke, M.C., Florida      Charles Thone, M.C., Nebraska  
David F. Emery, M.C., Maine      David C. Treen, M.C., Louisiana  
Edwin B. Forsythe, M.C., New Jersey      Paul S. Trible, Jr., M.C., Virginia  
James G. Martin, M.C., North Carolina      Larry Winn, Jr., M.C., Kansas

78040081059  
79040120929



# National Republican Congressional Committee

P.O. BOX 1989 • WASHINGTON, D.C. 20013 • TELEPHONE (202) 225-1800

Dear \_\_\_\_\_

Thank you for your support of the National Republican Congressional Committee. Knowing I could count on it has meant a lot to me personally.

Because of your help, we've elected some of the finest Republican Congressman ever. Men like Norm Shumway (CA-14), Newt Gingrich (GA-6), Dan Crane (IL-22), Bill Clinger (PA-23) and Carroll Campbell (SC-4). All in all, I say we had a good election year.

We've been reviewing our records and found we still need some additional information in order for us to meet our past reporting responsibilities under the Federal Election Campaign Act.

I would appreciate it if you would print the information missing in the space indicated at the bottom of this letter, and then return this entire letter to me in the enclosed envelope.

If you have any questions about our Committee or the recent elections, please use the enclosed envelope for that too. I'll be writing you shortly to let you know about our plans for 1979.

Sincerely,  
*Guy Vander Jagt*  
Congressman Guy Vander Jagt  
Chairman  
National Republican  
Congressional Committee

GVJ/lb

-----  
The Federal Election Law requires us to request the following information:

Occupation \_\_\_\_\_

Place of Business \_\_\_\_\_  
(Company Name) (Please include city and state)

Please check if self employed

61111 HRD#600J

78040081060



National Republican Congressional Committee

312 HOUSE OFFICE BLDG. ANNEX • WASHINGTON, D.C. 20515

790411

Mr. William Oldaker  
General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C.



FEDERAL ELECTION COMMISSION

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

November 14, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

William H. Schweitzer  
Baker, Hostetler, Frost & Towers  
818 Connecticut Avenue, N.W.  
Washington, D.C. 20006

Re: MUR 501

Dear Mr. Schweitzer:

The Commission is in receipt of the Conciliation Agreement which the National Republican Congressional Committee has signed in connection with the above-captioned matter.

Please find enclosed a copy of this Agreement signed by the General Counsel.

This investigation is now terminated. Copies of the Conciliation Agreement and other documents in this case will be placed in the public disclosure file.

As agreed to and referenced in your letter of October 27, 1978, the 30 and 60 day compliance periods referred to in the Conciliation Agreement will begin to run as of November 1, 1978.

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker  
General Counsel

cc: Mr. Steven Stockmeyer  
Executive Director  
National Republican Congressional Committee

78040081062  
79040120932

BEFORE THE FEDERAL ELECTION COMMISSION

SEPTEMBER , 1978

In the Matter of )  
 )  
National Republican Congressional ) MUR 501  
Committee )  
 )

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission ("Commission") in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Respondent National Republican Congressional Committee violated 2 U.S.C. § 434(b)(2) by omitting or inadequately reporting the occupation and principal place of business of certain of its contributors on its September 1976 monthly report and on its 1976 year-end report.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5) do hereby agree as follows:

- I. The Commission has jurisdiction over Respondent and the subject matter in this case.
- II. Respondent enters voluntarily into this agreement with the Commission.
- III. The pertinent facts in this matter are as follows:

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79040120933

(a) Respondent received from the Commission requests for additional information dated September 23, 1976 and February 14, 1977. These requests informed respondent that its monthly report for September, 1976 and its 1976 year end report, respectively, omitted or contained inadequate information concerning the occupation and principal place of business of certain of respondent's contributors.

(b) Respondent answered both requests and informed the Commission that it had undertaken what it considered its best efforts to comply with the pertinent reporting requirements.

(c) Respondent has not amended the above-cited reports with respect to occupation and principal place of business which are the subject matter of the instant Matter Under Review. WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 434(b) (2), a political committee is required to report the occupation and principal place of business for every contributor who contributes to that committee more than \$100 in the aggregate during the calendar year.

II. Respondent, as it has been notified by the Commission by letter dated March 29, 1978, inadequately reported the occupation and principal place of business on its September 1976 monthly report and on its 1976 year-end report for certain of its contributors who contributed more than \$100 in the aggregate, although it was and is the policy of respondent to request that information when soliciting its contributors. Respondent also inadequately reported the same information in its other 1975 and 1976 reports.

78040081064  
79040120934

78040081065  
79040120935

III. Although respondent believes (a) that its reporting of occupation and principal place of business in 1975 and 1976 complied with the Commission's best efforts standard, and (b) that the September 1976 monthly report and the 1976 year-end report were the only reports cited by the Commission in the Commission's notification letter dated March 29, 1978 as being deficient, respondent hereby agrees to contact its contributors for 1975 and 1976 for which occupation and/or principal place of business were reported inadequately in an effort to obtain such information. Respondent will report such information received on amended reports to be submitted to the Commission within 60 days of the signing of this agreement. Respondent will furnish to the Commission, within 30 days of the signing of this agreement, evidence of its efforts to obtain the above-mentioned information.

IV. Respondent will comply with the provisions of 2 U.S.C. § 434(b)(2) and the best efforts standard referenced in 2 U.S.C. § 434(b)(4) and 11 C.F.R. § 102.9(e) on all future reports to the Commission.

GENERAL CONDITIONS

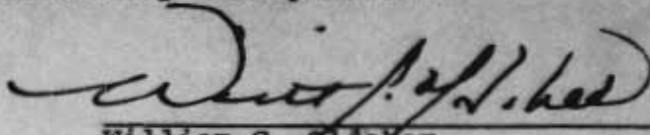
I. The Commission, shall on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1), concerning the matters at issue herein, or on its own motion, review compliance with this Conciliation Agreement. If the Commission believes that this Conciliation Agreement or any requirement thereof has been violated, it may institute a civil action

for relief in the United States District Court for the District of Columbia.

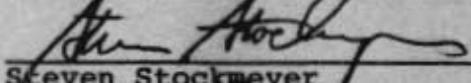
II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g (a) (5) (A) and that this Conciliation Agreement, unless violated, shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Conciliation Agreement.

III. It is mutually agreed that this Conciliation Agreement will become effective upon approval by the Commission and after execution by both parties.

11/10/78  
Date

  
William C. Oldaker  
General Counsel  
Federal Election Commission

10/23/78  
Date

  
Steven Stockmeyer  
Executive Director  
National Republican Congressional Committee

78040081066  
79040120935

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
National Republican Congressional ) MUR 501  
Committee )

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on November 9, 1978, the Commission determined by a vote of 4-0 to adopt the following recommendations, as set forth in the General Counsel's memorandum dated November 6, 1978, regarding the above-captioned matter:

1. That the Commission accept the amended Conciliation Agreement, approved by by Commission on September 13, 1978, signed by the respondent and attached to the above-named memorandum.
2. Close the file in this matter.
3. Send the letter attached to the above-named memorandum.

Voting for this determination were Commissioners Springer, McGarry, Thomson, and Harris.

Attest:

11/9/78  
Date

*Marjorie W. Emmons*  
\_\_\_\_\_  
Marjorie W. Emmons  
Secretary to the Commission

Received in Office of Commission Secretary: 11-7-78, 9:38  
Circulated on 48 hour vote basis: 11-7-78, 11:00

78040081067  
79040120937

November 7, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 501 Memo and Conciliation Agreement

The memo sent to the Commission Secretary's office on November 6, 1978 requesting circulation of a conciliation agreement should not go through Orlando Potter. Please eliminate his name from the memo.

Thank you.

78040081068  
790401209388

November 6, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 501

Please have the attached Memo and conciliation agreement distributed to the Commission on a 48 hour tally basis.

Thank you.

78040081069  
79040120937



FEDERAL ELECTION COMMISSION

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

RECEIVED  
OFFICE OF THE  
COMMISSIONER

78 NOV 7 A 9: 30

November 7, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr *EG*  
SUBJECT: MUR 501 Memo and Conciliation Agreement

The memo sent to the Commission Secretary's office on November 6, 1978 requesting circulation of a conciliation agreement should not go through Orlando Potter. Please eliminate his name from the memo.

Thank you.

78040081070  
79040120940



FEDERAL ELECTION COMMISSION

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

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

78 NOV 7 A 7: 54

November 6, 1978

MEMORANDUM

TO: THE COMMISSION

~~FROM: GEORGE H. POTTER~~

FROM: WILLIAM C. OLDAKER  
GENERAL COUNSEL

RE: MUR 501

78040081071  
79040120941

On September 13, 1978, the Commission approved the amended Conciliation Agreement in this matter. A copy of this Agreement, signed by the Respondent is attached.

The Office of General Counsel recommends that the Commission accept this Agreement and close the file in this matter. We also recommend that the attached letter be sent.

BEFORE THE FEDERAL ELECTION COMMISSION

SEPTEMBER , 1978

In the Matter of	)	
	)	
National Republican Congressional	)	MUR 501
Committee	)	
	)	

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission ("Commission") in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Respondent National Republican Congressional Committee violated 2 U.S.C. § 434(b)(2) by omitting or inadequately reporting the occupation and principal place of business of certain of its contributors on its September 1976 monthly report and on its 1976 year-end report.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5) do hereby agree as follows:

- I. The Commission has jurisdiction over Respondent and the subject matter in this case.
- II. Respondent enters voluntarily into this agreement with the Commission.
- III. The pertinent facts in this matter are as follows:

78040081072  
79040120942

(a) Respondent received from the Commission requests for additional information dated September 23, 1976 and February 14, 1977. These requests informed respondent that its monthly report for September, 1976 and its 1976 year end report, respectively, omitted or contained inadequate information concerning the occupation and principal place of business of certain of respondent's contributors.

(b) Respondent answered both requests and informed the Commission that it had undertaken what it considered its best efforts to comply with the pertinent reporting requirements.

(c) Respondent has not amended the above-cited reports with respect to occupation and principal place of business which are the subject matter of the instant Matter Under Review. WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 434(b)(2), a political committee is required to report the occupation and principal place of business for every contributor who contributes to that committee more than \$100 in the aggregate during the calendar year.

II. Respondent, as it has been notified by the Commission by letter dated March 29, 1978, inadequately reported the occupation and principal place of business on its September 1976 monthly report and on its 1976 year-end report for certain of its contributors who contributed more than \$100 in the aggregate, although it was and is the policy of respondent to request that information when soliciting its contributors. Respondent also inadequately reported the same information in its other 1975 and 1976 reports.

78040081073  
79040120943

7 8 0 4 0 0 8 1 0 7 4  
7 9 0 4 0 1 2 0 9 4 4

III. Although respondent believes (a) that its reporting of occupation and principal place of business in 1975 and 1976 complied with the Commission's best efforts standard, and (b) that the September 1976 monthly report and the 1976 year-end report were the only reports cited by the Commission in the Commission's notification letter dated March 29, 1978 as being deficient, respondent hereby agrees to contact its contributors for 1975 and 1976 for which occupation and/or principal place of business were reported inadequately in an effort to obtain such information. Respondent will report such information received on amended reports to be submitted to the Commission within 60 days of the signing of this agreement. Respondent will furnish to the Commission, within 30 days of the signing of this agreement, evidence of its efforts to obtain the above-mentioned information.

IV. Respondent will comply with the provisions of 2 U.S.C. § 434(b)(2) and the best efforts standard referenced in 2 U.S.C. § 434(b)(4) and 11 C.F.R. § 102.9(e) on all future reports to the Commission.

GENERAL CONDITIONS

I. The Commission, shall on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1), concerning the matters at issue herein, or on its own motion, review compliance with this Conciliation Agreement. If the Commission believes that this Conciliation Agreement or any requirement thereof has been violated, it may institute a civil action

for relief in the United States District Court for the District of Columbia.

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g (a) (5) (A) and that this Conciliation Agreement, unless violated, shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Conciliation Agreement.

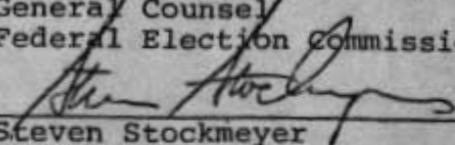
III. It is mutually agreed that this Conciliation Agreement will become effective upon approval by the Commission and after execution by both parties.

78040081075  
79040120945

\_\_\_\_\_  
Date

10/23/78  
Date

\_\_\_\_\_  
William C. Oldaker  
General Counsel  
Federal Election Commission

  
\_\_\_\_\_  
Steven Stockmeyer  
Executive Director  
National Republican Congressional  
Committee



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

William H. Schweitzer  
Baker, Hostetler, Prost & Towers  
818 Connecticut Avenue, N.W.  
Washington, D.C. 20006

Re: MUR 501

Dear Mr. Schweitzer:

The Commission is in receipt of the Conciliation Agreement which the National Republican Congressional Committee has signed in connection with the above-captioned matter.

Please find enclosed a copy of this Agreement signed by the General Counsel.

This investigation is now terminated. Copies of the Conciliation Agreement and other documents in this case will be placed in the public disclosure file.

As agreed to and referenced in your letter of October 27, 1978, the 30 and 60 day compliance periods referred to in the Conciliation Agreement will begin to run as of November 1, 1978.

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker  
General Counsel

cc: Mr. Steven Stockmeyer  
Executive Director  
National Republican Congressional Committee

78040081076  
79040120945

6004  
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BAKER, HOSTETLER, FROST & TOWERS

COUNSELLORS AT LAW  
818 CONNECTICUT AVE., N.W.  
WASHINGTON, D. C. 20006

(202) 527-1800

WRITER'S DIRECT DIAL NO.:  
(202) 857-1531

IN CLEVELAND, OHIO  
BAKER, HOSTETLER & PATTERSON  
1888 UNION COMMERCE BUILDING  
CLEVELAND, OHIO 44115  
(216) 421-0400  
TWX 510 421 8278

October 27, 1978

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

Re: MUR 501

Dear Mr. Oldaker:

Enclosed is the Conciliation Agreement entered into by the National Republican Congressional Committee ("NRCC") and the Federal Election Commission in Matter Under Review 501. Mr. Steven Stockmeyer, Executive Director of the NRCC, signed this Agreement on October 23, 1978.

Pursuant to a telephone conversation which you and I had approximately two weeks ago, the 30 and 60 day periods for compliance with the Conciliation Agreement will not begin to run until November 1, 1978.

Please send me a copy of the Agreement after you have signed it and after it is formally approved by the Commission.

Thank you for your assistance in this matter.

Very truly yours,

William H. Schweitzer

WHS:gh  
Encl.

cc: Mr. Stockmeyer

78040081077  
79040120947

BAKER, HOSTETLER, FROST & TOWERS

815 CONNECTICUT AVE., N. W.  
WASHINGTON, D. C. 20006

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



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO CHARLES STEELE  
FROM: MARJORIE W. EMMONS *MJE by fe*  
DATE: OCTOBER 20, 1978  
SUBJECT: MUR 501 - Interim Report dated 10-18-78  
Received in OCS 10-19-78,  
12:07

The above-named document was circulated on a 24  
hour no-objection basis at 3:30, October 19, 1978.

The Commission Secretary's Office has received  
no objections to the Interim Report as of 3:30 this  
date.

78040081079  
79040120949

October 19, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 501

Please have the attached Interim Report distributed  
to the Commission.

Thank you.

78040081080  
79040120950

78 OCT 19 P12: 07

BEFORE THE FEDERAL ELECTION COMMISSION

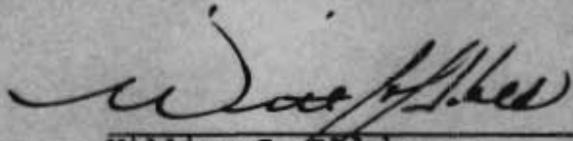
In the Matter of	)	
	)	
The National Republican Congressional	)	MUR 501
Committee	)	

INTERIM REPORT

On September 13, 1978, the Commission approved the proposed conciliation agreement in this matter.

The Office of General Counsel has contacted the counsel for the Respondent and has been informed that the Respondent intends to sign this agreement and forward same to this Office in the near future. At that time the General Counsel will sign this agreement and the sixty day period will begin to run in which the Respondent must obtain contributors' occupation and principal place of business and report this information on amended reports for 1976 and 1977.

10/18/78  
Date

  
\_\_\_\_\_  
William C. O'Daker  
General Counsel

78040081081  
79040120951



FEDERAL ELECTION COMMISSION

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

September 29, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

William H. Schweitzer  
Baker, Hostetler, Frost & Towers  
818 Connecticut Ave.,  
Washington, D.C. 20006

Re: MUR 501

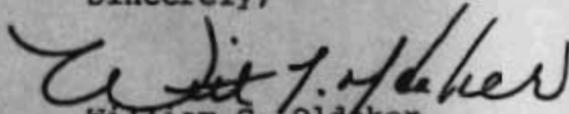
Dear Mr. Schweitzer:

On September 13, 1978, the Federal Election Commission approved the enclosed Conciliation Agreement as amended.

If this Agreement is acceptable to you please have it signed and return it to the Office of General Counsel. At that time a copy of the Agreement signed by Mr. Stockmeyer and the General Counsel will be forwarded to you.

You are reminded that this Conciliation Agreement has not been complied with until: 1) the Commission has received evidence that the National Republican Congressional Committee contacted its contributors for 1975 and 1976 for which the occupation and/or principal place of business were inadequately reported; and, (2) the Commission has received amended reports, within 60 days of the signing of this Agreement, reflecting the additional information received from these contributors.

Sincerely,

  
William C. Oldaker  
General Counsel

Enclosure

cc: Mr. Steven Stockmeyer  
Executive Director  
National Republican Congressional Committee  
521 House Office Bldg. Annex  
Washington, D.C. 20515

7804008108  
79040120952

BEFORE THE FEDERAL ELECTION COMMISSION

SEPTEMBER , 1978

In the Matter of )  
 )  
National Republican Congressional ) MUR 501  
Committee )  
 )

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission ("Commission") in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Respondent National Republican Congressional Committee violated 2 U.S.C. § 434(b)(2) by omitting or inadequately reporting the occupation and principal place of business of certain of its contributors on its September 1976 monthly report and on its 1976 year-end report.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5) do hereby agree as follows:

- I. The Commission has jurisdiction over Respondent and the subject matter in this case.
- II. Respondent enters voluntarily into this agreement with the Commission.
- III. The pertinent facts in this matter are as follows:

78040081083  
79040120953

(a) Respondent received from the Commission requests for additional information dated September 23, 1976 and February 14, 1977. These requests informed respondent that its monthly report for September, 1976 and its 1976 year end report, respectively, omitted or contained inadequate information concerning the occupation and principal place of business of certain of respondent's contributors.

(b) Respondent answered both requests and informed the Commission that it had undertaken what it considered its best efforts to comply with the pertinent reporting requirements.

(c) Respondent has not amended the above-cited reports with respect to occupation and principal place of business which are the subject matter of the instant Matter Under Review. WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 434(b) (2), a political committee is required to report the occupation and principal place of business for every contributor who contributes to that committee more than \$100 in the aggregate during the calendar year.

II. Respondent, as it has been notified by the Commission by letter dated March 29, 1978, inadequately reported the occupation and principal place of business on its September 1976 monthly report and on its 1976 year-end report for certain of its contributors who contributed more than \$100 in the aggregate, although it was and is the policy of respondent to request that information when soliciting its contributors. Respondent also inadequately reported the same information in its other 1975 and 1976 reports.

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III. Although respondent believes (a) that its reporting of occupation and principal place of business in 1975 and 1976 complied with the Commission's best efforts standard, and (b) that the September 1976 monthly report and the 1976 year-end report were the only reports cited by the Commission in the Commission's notification letter dated March 29, 1978 as being deficient, respondent hereby agrees to contact its contributors for 1975 and 1976 for which occupation and/or principal place of business were reported inadequately in an effort to obtain such information. Respondent will report such information received on amended reports to be submitted to the Commission within 60 days of the signing of this agreement. Respondent will furnish to the Commission, within 30 days of the signing of this agreement, evidence of its efforts to obtain the above-mentioned information.

IV. Respondent will comply with the provisions of 2 U.S.C. § 434(b)(2) and the best efforts standard referenced in 2 U.S.C. § 434(b)(4) and 11 C.F.R. § 102.9(e) on all future reports to the Commission.

GENERAL CONDITIONS

I. The Commission, shall on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1), concerning the matters at issue herein, or on its own motion, review compliance with this Conciliation Agreement. If the Commission believes that this Conciliation Agreement or any requirement thereof has been violated, it may institute a civil action

for relief in the United States District Court for the District of Columbia.

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g (a) (5) (A) and that this Conciliation Agreement, unless violated, shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Conciliation Agreement.

III. It is mutually agreed that this Conciliation Agreement will become effective upon approval by the Commission and after execution by both parties.

\_\_\_\_\_  
Date

\_\_\_\_\_  
William C. Oldaker  
General Counsel  
Federal Election Commission

\_\_\_\_\_  
Date

\_\_\_\_\_  
Steven Stockmeyer  
Executive Director  
National Republican Congressional  
Committee

78040081086  
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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
National Republican Congressional )  
Committee )

MUR 501

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on September 13, 1978, the Commission approved by a vote of 5-0 the proposed conciliation agreement and draft letters in MUR 501 as attached to the General Counsel's Report signed August 29, 1978, and amended by the General Counsel at the Commission meeting of September 13, 1978.

Commissioner Springer was not present at the time of the vote.

9/13/78  
Date

Marjorie W. Emmons  
Marjorie W. Emmons  
Secretary to the Commission

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FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *MWE*

SUBJECT: MUR 501 - General Counsel's Report  
 Dated 8-19-78  
 Signed: 8-29-78  
 Received in Office of Commission  
 Secretary: 8-30-78, 2:12

DATE: AUGUST 31, 1978

The above-named document was circulated on a 48 hour vote basis at 9:30 a.m., August 31, 1978.

Commissioner Harris submitted an objection at 10 15 this date thereby placing MUR 501 on the Executive Session Agenda for September 13, 1978.

cc: Commissioner Harris

78040081088  
79040120958



August 30, 1978

MEMORANDUM TO: Marge Remons  
FROM: Elissa T. Garr  
SUBJECT: MUR 501

Please have the attached General Counsel's Report on  
MUR 501 distributed to the Commission on a 48 hour tally  
basis.

Thank you.

78040081089  
79040120959

BEFORE THE FEDERAL ELECTION COMMISSION

AUGUST 19 1978

In the Matter of )  
National Republican Congressional ) MUR 501  
Committee )

GENERAL COUNSEL'S REPORT

On May 17, 1978, the Federal Election Commission found reasonable cause to believe that the National Republican Congressional Committee violated 2 U.S.C. § 434(b)(2) by failing to report the occupation and principal place of business of certain of its contributors. On June 7, the Commission approved an amended conciliation agreement in this matter which was forwarded to the respondent.

After a period of conciliation the General Counsel and the respondent have mutually agreed upon the attached proposed agreement.

With regard to violation of 2 U.S.C. § 434(b)(2) the respondent has not explicitly admitted a violation however the respondent has agreed that it inadequately reported the occupation and principal place of business of certain of its contributors on its 1975 and 1976 reports.

While the provision for a penalty has been omitted, the respondent agrees to contact its contributors for 1975 and 1976 for which occupation and/or principal place of business were inadequately reported in an effort to obtain such information. Respondent has further agreed to present evidence of its efforts to contact these contributors and to file amended reports for 1975 and 1976 with the information obtained.

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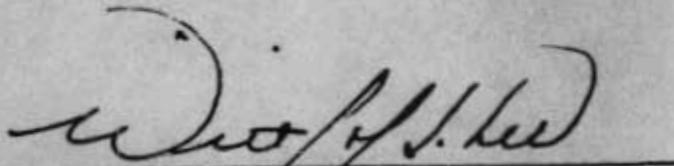
Reference to the findings of the auditors concerning the respondent's inadequate reporting has been omitted from the proposed agreement as no formal audit letter or report has yet been issued by the Commission concerning the audit of the respondent.

Additionally reference has been added to the respondent's institution in 1977 of a new computer system which reports more completely the required occupation and principal place of business data as well as providing an automatic follow up procedure when inadequate information is received from contributors.

Recommendation

Adopt the proposed conciliation agreement and send the attached letters.

8/29/78  
Date

  
\_\_\_\_\_  
William C. Oldaker  
General Counsel

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Packet contains

- 1. G.C. Report
- 2. Conciliation agreement
- 3. Ltr to S. Stockmeyer
- 4. Certification

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
The National Republican  
Congressional Committee  
Respondent

MUR 501

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission ("Commission") in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Respondent National Republican Congressional Committee violated 2 U.S.C. § 434(b)(2) by omitting or inadequately reporting the occupation and principal place of business of certain of its contributors on its September 1976 monthly report and on its 1976 year-end report.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Commission has jurisdiction over Respondent and the subject matter in the case.

II. Respondent enters voluntarily into this agreement with the Commission.

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III. The pertinent facts in this matter are as follows:

(a) Respondent received from the Commission requests for additional information dated September 23, 1976 and February 14, 1977. These requests informed respondent that its monthly report for September, 1976 and its 1976 year end report, respectively, omitted or contained inadequate information concerning the occupation and principal place of business of certain of respondent's contributors.

(b) Respondent answered both requests and informed the Commission that it had undertaken what it considered its best efforts to comply with the pertinent reporting requirements. Respondent informed the Commission that its efforts included developing a computerized system of more adequately reporting the required occupation and principal place of business data as well as implementing an automatic follow up procedure. This system became operational in the fall of 1977.

(c) Respondent has not amended the above-cited reports with respect to occupation and principal place of business which are the subject matter of the instant Matter Under Review.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 434(b)(2), a political committee is required to report the occupation and principal place of

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business for every contributor who contributes to that committee more than \$100 in the aggregate during the calendar year.

II. Respondent, as it has been notified by the Commission by letter dated March 29, 1978, inadequately reported the occupation and principal place of business on its September 1976 monthly report and on its 1976 year-end report for certain of its contributors who contributed more than \$100 in the aggregate, although it was and is the policy of respondent to request that information when soliciting its contributors. Respondent also inadequately reported the same information in its other 1975 and 1976 reports.

III. Although respondent believes (a) that its reporting of occupation and principal place of business in 1975 and 1976 and its development of its computerized reporting and follow-up system which is now operational complied with the Commission's best efforts standard, and (b) that the September 1976 monthly report and the 1976 year-end report were the only reports cited by the Commission in the Commission's notification letter dated March 29, 1978 as being deficient, respondent hereby agrees to contact its contributors for 1975 and 1976 for which occupation and/or principal place of business were reported inadequately in an effort to obtain such information. Respondent will report such information received on amended reports to be submitted to the Commission within 60 days of the signing of this

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agreement. Respondent will furnish to the Commission, within 30 days of the signing of this agreement, evidence of its efforts to obtain the above- mentioned information.

IV. Respondent will comply with the provisions of 2 U.S.C. § 434(b)(2) and the best efforts standard referenced in 2 U.S.C. § 434(b)(4) and 11 C.F.R. § 102.9(e) on all future reports to the Commission.

GENERAL CONDITIONS

I. The Commission, shall on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1), concerning the matters at issue herein, or on its own motion, review compliance with this Conciliation Agreement. If the Commission believes that this Conciliation Agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g (a)(5)(A) and that this Conciliation Agreement, unless violated, shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Conciliation Agreement.

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III. It is mutually agreed that this Conciliation Agreement will become effective upon approval by the Commission and after execution by both parties.

\_\_\_\_\_  
Date

\_\_\_\_\_  
William C. Oldaker  
General Counsel  
Federal Election Commission

\_\_\_\_\_  
Date

\_\_\_\_\_  
Steven Stockmeyer  
Executive Director  
National Republican Congressional  
Committee

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FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Steven Stockmeyer  
Executive Director  
National Republican Congressional Committee  
512 House Office Bldg. Annex  
Washington, DC 20515

Re: MUR 501

Dear Mr. Stockmeyer:

On August , 1978, the Federal Election Commission approved the enclosed conciliation agreement which has been agreed to by the Commission's General Counsel and Counsel for the National Republican Congressional Committee.

Please sign this agreement and return it to the General Counsel's Office where it will be signed by the General Counsel. At that time a copy of this agreement signed by both parties, will be forwarded to you.

You are reminded that this conciliation agreement has not been complied with until: 1) the Commission has received evidence that the National Republican Congressional Committee contacted its contributors for 1975 and 1976 for which the occupation and/or principal place of business were inadequately reported; and, (2) the Commission has received amended reports, within 60 days of the signing of this agreement, reflecting the additional information received from these contributors.

Sincerely,

William C. Oldaker  
General Counsel

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BAKER, HOSTETLER, FROST & PATTERSON  
COUNSELLORS AT LAW  
618 CONNECTICUT AVE., N.W.  
WASHINGTON, D. C. 20006

acc# 4346

RECEIVED  
FEDERAL ELECTION  
COMMISSION

18 AUG 2 P 4: 21

WRITER'S DIRECT DIAL NO.:  
(202) 657- 1531

(202) 657-1800

IN CLEVELAND, OHIO  
BAKER, HOSTETLER & PATTERSON  
1988 UNION COMMERCE BUILDING  
CLEVELAND, OHIO 44115  
(216) 621-0200  
TWX 610 421 6276

August 2, 1978

ED5003

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

Re: MUR 501

Dear Mr. Oldaker:

Enclosed is the Conciliation Agreement which you and I drafted during our meeting on July 18, 1978. Mr. Steven Stockmeyer, Executive Director of the National Republican Congressional Committee ("NRCC"), accepts this Agreement on behalf of the NRCC and will sign it after it is approved by the Federal Election Commission.

Thank you for your assistance in this matter.

Very truly yours,

*William H. Schweitzer*

William H. Schweitzer

WHS:gh  
Encl.

cc: Steven Stockmeyer  
Thomas Josefiak

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
The National Republican  
Congressional Committee  
Respondent

MUR 501

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission ("Commission") in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Respondent National Republican Congressional Committee violated 2 U.S.C. § 434(b)(2) by omitting or inadequately reporting the occupation and principal place of business of certain of its contributors on its September 1976 monthly report and on its 1976 year-end report.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Commission has jurisdiction over Respondent and the subject matter in the case.

II. Respondent enters voluntarily into this agreement with the Commission.

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III. The pertinent facts in this matter are as follows:

(a) Respondent received from the Commission requests for additional information dated September 23, 1976 and February 14, 1977. These requests informed respondent that its monthly report for September, 1976 and its 1976 year end report, respectively, omitted or contained inadequate information concerning the occupation and principal place of business of certain of respondent's contributors.

(b) Respondent answered both requests and informed the Commission that it had undertaken what it considered its best efforts to comply with the pertinent reporting requirements. Respondent informed the Commission that its efforts included developing a computerized system of more adequately reporting the required occupation and principal place of business data as well as implementing an automatic follow up procedure. This system became operational in the fall of 1977.

(c) Respondent has not amended the above-cited reports with respect to occupation and principal place of business which are the subject matter of the instant Matter Under Review.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 434(b)(2), a political committee is required to report the occupation and principal place of

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business for every contributor who contributes to that committee more than \$100 in the aggregate during the calendar year.

II. Respondent, as it has been notified by the Commission by letter dated March 29, 1978, inadequately reported the occupation and principal place of business on its September 1976 monthly report and on its 1976 year-end report for certain of its contributors who contributed more than \$100 in the aggregate, although it was and is the policy of respondent to request that information when soliciting its contributors. Respondent also inadequately reported the same information in its other 1975 and 1976 reports.

III. Although respondent believes (a) that its reporting of occupation and principal place of business in 1975 and 1976 and its development of its computerized reporting and follow-up system which is now operational complied with the Commission's best efforts standard, and (b) that the September 1976 monthly report and the 1976 year-end report were the only reports cited by the Commission in the Commission's notification letter dated March 29, 1978 as being deficient, respondent hereby agrees to contact its contributors for 1975 and 1976 for which occupation and/or principal place of business were reported inadequately in an effort to obtain such information. Respondent will report such information received on amended reports to be submitted to the Commission within 60 days of the signing of this

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agreement. Respondent will furnish to the Commission, within 30 days of the signing of this agreement, evidence of its efforts to obtain the above-mentioned information.

IV. Respondent will comply with the provisions of 2 U.S.C. § 434(b)(2) and the best efforts standard referenced in 2 U.S.C. § 434(b)(4) and 11 C.F.R. § 102.9(e) on all future reports to the Commission.

GENERAL CONDITIONS

I. The Commission, shall on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1), concerning the matters at issue herein, or on its own motion, review compliance with this Conciliation Agreement. If the Commission believes that this Conciliation Agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A) and that this Conciliation Agreement, unless violated, shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Conciliation Agreement.

III. It is mutually agreed that this Conciliation Agreement will become effective upon approval by the Commission and after execution by both parties.

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Date \_\_\_\_\_

\_\_\_\_\_  
William C. Oldaker  
General Counsel  
Federal Election Commission

Date \_\_\_\_\_

\_\_\_\_\_  
Steven Stockmeyer  
Executive Director  
National Republican Congressional  
Committee

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BAKER, HOSTETTLER, FROST & TOWERS) 1 2 0 9 7 1

818 CONNECTICUT AVE., N.W.  
WASHINGTON, D.C. 20006

COMMISSION

78 AUG 2 P 4: 20

William C. Oldaker, Esquire  
General Counsel  
Federal Election Commission  
1325 K Street, N. W.  
Fifth Floor  
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION

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

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79040120975

MEMORANDUM TO

CHARLES STEELE

FROM:

MARJORIE W. EMMONS *MWE*

DATE:

JULY 31, 1978

SUBJECT:

MUR 501 - Interim Report, undated  
Received in Office of Commission  
Secretary: 7-28-78, 11:40

The above-named document was circulated on a 24 hour no-objection basis at 3:00 p.m. on July 28, 1978.

The Commission Secretary's Office has received no objections to the Interim Report as of 4:00 p.m. this date.

Commissioners Harris, Springer, Staebler, Thomson, and Tiernan have returned their papers by the deadline.

July 28, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 501

Please have the attached Interim Report on MUR 501 distributed to the Commission.

Thank you.

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BEFORE THE FEDERAL ELECTION COMMISSION

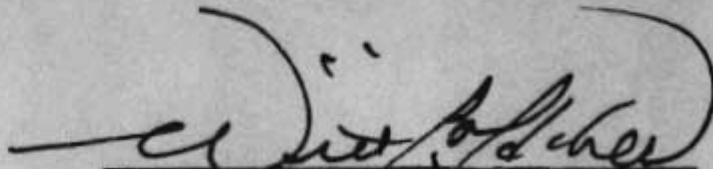
In the Matter of )  
 )  
The National Republican ) MUR 501  
Congressional Committee )

INTERIM REPORT

On May 17, 1978 the Commission found reasonable cause to believe the National Republican Congressional Committee violated 2 U.S.C. § 434(b)(2) by failing to report the occupation and principal place of business of certain of its contributors. On June 7, 1978 the Commission approved the amended conciliation agreement in this matter, which was mailed to the respondent on June 8, 1978.

The respondent submitted a revised conciliation agreement in late June which this Office examined and further revised. The General Counsel then met with counsel for the respondent to negotiate an acceptable agreement. This Office is now awaiting the second revised conciliation agreement to be proposed by the respondent. An acceptable compromise is expected to result in the very near future.

5/20/78  
Date

  
William C. Oldaker  
General Counsel

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79040120977



FEDERAL ELECTION COMMISSION

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

July 10, 1978

MEMORANDUM TO: CHARLES STEELE  
FROM: MARJORIE W. EMMONS *MWE*  
SUBJECT: MUR 501 - Interim Report dated 7-6-78  
Received in Office of Commission  
Secretary 7-6-78, 3:41

The above-mentioned document was circulated on a 24  
hour no-objection basis at 9:00 a.m., July 7, 1978.

As of 9:30 a.m., this date, no objections have been  
received in the Office of Commission Secretary to the  
Interim Report.

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July 6, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUI: 501

Please have the attached Interim Report on MUR 501 distributed to the Commission.

Thank you.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

The National Republican Congressional )  
Committee )

MUR 501

INTERIM REPORT

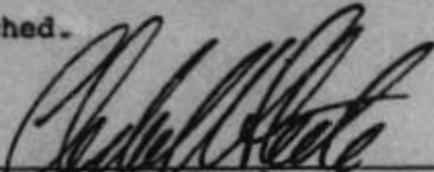
On May 17, 1978 the Commission found reasonable cause to

believe the National Republican Congressional Committee violated  
U.S.C. §434(b)(2) by failing to report the occupation and  
principal place of business of certain of its contributors.

On June 7, 1978 the Commission approved the amended conciliation  
agreement in this matter which was mailed to the respondent on  
June 8, 1978.

The respondent has submitted a revised conciliation agreement  
which the Office of General Counsel has reviewed and re-written.  
This version of the conciliation agreement will be sent shortly  
to the respondent at which time it is expected that a final  
conciliation agreement will be reached.

6 July 1978  
Date

  
\_\_\_\_\_  
Charles N. Steele  
Associate General Counsel



FEDERAL ELECTION COMMISSION

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

July 6, 1978

William H. Schweitzer  
Baker, Hostetler, Frost and Towers  
818 Connecticut Ave., N. W.  
Washington, DC 20006

Re: MUR 501

Dear Mr. Schweitzer:

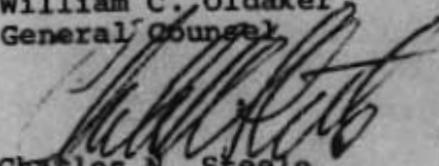
We have received your correspondence of June 23, 1978 and the enclosed Draft Conciliation Agreement.

Upon consideration of your Draft Agreement, we propose the enclosed version as our counter-offer.

Please let us know when you have considered this Agreement.

Sincerely,

William C. Oldaker  
General Counsel

  
Charles N. Steele  
Associate General Counsel

Enclosure

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79040120981

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
The National Republican ) MUR 501  
Congressional Committee )

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that the National Republican Congressional Committee violated 2 U.S.C. § 434(b)(2) by failing to report the occupation and principal place of business of certain of its contributors.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. The Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

A. Respondent received from the Commission requests for additional information dated September 23, 1976, and February 14, 1977, concerning inadequate or omitted occupation and inadequate or omitted principal place of business of contributors on certain of Respondent's

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reports of receipts and expenditures.

B. Respondent answered both requests and informed the Commission that it had undertaken what it considered to be its best efforts to comply with the pertinent reporting requirements in that Respondent was developing a computerized system capable of more adequately reporting the required occupation and principal place of business data on future reports as well as implementing an automatic follow-up procedure. This system became operational in the fall of 1977.

C. During the course of the audit of the National Republican Congressional Committee, Respondent discussed with Commission's auditors the omission of occupation and principal place of business for certain of Respondent's contributors from many of Respondent's disclosure reports for 1975 and 1976 at which time Respondent was told it must make efforts to furnish this missing information.

D. Respondent has not filed amendments for any of its 1975 and 1976 reports disclosing the omitted occupation and principal place of business information.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 434(b)(2), a political committee is required to report the occupation and principal place of business for every contributor who contributes to that committee \$100 or more aggregate during the calendar year.

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II. Respondent omitted or inadequately reported the occupation and principal place of business for certain of its contributors who contributed \$100 or more in the aggregate to the National Republican Congressional Committee in 1975 and 1976 in violation of 2 U.S.C. § 434(b)(2) although it was and is the policy of Respondent to request that information when soliciting its contributors.

7804008114  
79040120984  
III. Respondent will contact its contributors for 1975 and 1976 for which no occupation and/or principal place of business were reported in an effort to obtain such information. Respondent will report such information received on amended reports to be submitted to the Commission within 60 days of the signing of this agreement. Respondent will furnish to the Commission, within 30 days of the signing of this agreement, evidence of its efforts to comply with this condition of the Conciliation Agreement.

IV. Respondent will comply with the provisions of 2 U.S.C. § 434(b)(2) on all future reports to the Commission or show best efforts to do so.

General Conditions

I. The Commission shall, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1), concerning the matters at issue herein, or on its own motion, review compliance with this Agreement. If the Commission believes that this Agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement, unless violated, shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

\_\_\_\_\_  
William C. Oldaker  
General Counsel  
Federal Election Commission

\_\_\_\_\_  
Steven Stockmeyer  
Executive Director  
National Republican Congressional  
Committee

78040081115  
79040120985

\_\_\_\_\_  
Date

\_\_\_\_\_  
Date

BAKER, HOSTETLER, FROST & TOWERS

COUNSELLORS AT LAW  
818 CONNECTICUT AVE., N.W.  
WASHINGTON, D. C. 20006

(202) 867-1600

WRITER'S DIRECT DIAL NO.:

(202) 867- 1531

JCC 3900  
NAN

IN CLEVELAND, OHIO  
BAKER, HOSTETLER & PATTERSON  
1956 UNION COMMERCE BUILDING  
CLEVELAND, OHIO 44115  
(216) 421-0200  
TWX 510 421 8375

June 23, 1978

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

Re: Matter Under Review 501

Dear Mr. Oldaker:

Pursuant to our discussions at the meeting held in your office on June 13, 1978, enclosed is a copy of a draft Conciliation Agreement prepared by me for the National Republican Congressional Committee in Matter Under Review 501. Please give me a call when you have had an opportunity to review this Conciliation Agreement.

Very truly yours,

*William H. Schweitzer*  
William H. Schweitzer

WHS:gh  
Encl.

cc: Steven Stockmeyer  
Claire Lindsay

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79040120986

DRAFT

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
The National Republican  
Congressional Committee  
Respondent

MUR 501

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission ("Commission") in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Respondent National Republican Congressional Committee violated 2 U.S.C. § 434(b)(2) by omitting or inadequately reporting the occupation and principal place of business of certain of its contributors on its September 1976 monthly report and on its 1976 year-end report.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

- I. The Commission has jurisdiction over Respondent and the subject matter in the case.
- II. Respondent enters voluntarily into this agreement with the Commission.

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III. The pertinent facts in this matter are as follows:

(a) Respondent received from the Commission requests for additional information dated September 23, 1976 and February 14, 1977. These requests informed respondent that its monthly report for September, 1976 and its 1976 year end report, respectively, omitted or contained inadequate information concerning the occupation and principal place of business of certain of respondent's contributors.

(b) Respondent promptly answered both requests and informed the Commission that it had undertaken what it considered its best efforts to comply with the pertinent reporting requirements. 2 U.S.C. § 434(b)(14); 11 C.F.R. § 102.9(e). Respondent informed the Commission that its best efforts included developing a computerized system of more adequately reporting the required occupation and principal place of business data as well as implementing an automatic follow up procedure. This system became operational in the fall of 1977.

(c) Respondent has not amended the above-cited reports with respect to occupation and principal place of business which are the subject matter of the instant Matter Under Review.

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WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 434(b)(2), a political committee is required to report the occupation and principal place of business for every contributor who contributes to that committee more than \$100 in the aggregate during the calendar year.

II. Respondent inadequately reported the occupation and principal place of business on its September 1976 monthly report and on its 1976 year-end report for certain of its contributors who contributed more than \$100 in the aggregate, although it was and is the policy of respondent to request that information when soliciting its contributors.

III. Although respondent believes (a) that its reporting of occupation and principal place of business in 1975 and 1976 and its development of its computerized reporting and follow-up system which is now operational complied with the Commission's best efforts standard, 2 U.S.C. § 434(b)(4); 11 C.F.R. § 102.9(e), and (b) that the September 1976 monthly report and the 1976 year-end report were the only reports cited by the Commission as being deficient, respondent hereby agrees to contact its contributors for 1975 and 1976 in those instances where occupation and/or principal place of business were reported inadequately in an effort to obtain such information.

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Respondent will report such information received on amended reports to be submitted to the Commission within 60 days of the signing of this agreement. Respondent will furnish to the Commission, within 30 days of the signing of this agreement, evidence of its efforts to obtain the above-mentioned information.

IV. Respondent will comply with the provisions of 2 U.S.C. § 434(b)(2) and the best efforts standard referenced in 2 U.S.C. § 434(b)(4) and 11 C.F.R. § 102.9(e) on all future reports to the Commission.

WHEREFORE, the Commission and Respondent mutually agree that:

I. The Commission, shall on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1), concerning the matters at issue herein, or on its own motion, review compliance with this Conciliation Agreement. If the Commission believes that this Agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

II. This Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A) and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to Matter Under Review 501 and the matters set forth in this Agreement.

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III. This Conciliation Agreement will become effective on the date that respondent and the General Counsel of the Commission have executed said Conciliation Agreement and said Conciliation Agreement has been approved by the Commission.

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\_\_\_\_\_  
Date

\_\_\_\_\_  
William C. Oldaker  
General Counsel  
Federal Election Commission

\_\_\_\_\_  
Date

\_\_\_\_\_  
Steven Stockmeyer  
Executive Director  
National Republic Congressional  
Committee

\_\_\_\_\_  
Date

APPROVED: \_\_\_\_\_  
Federal Election  
Commission

**BAKER, HOSTETLER, FROST & TOWERS**

818 CONNECTICUT AVE., N.W.

WASHINGTON, D.C. 20006

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Ms. Claire Lindsay  
Federal Election Commission  
1325 K Street, N. W.  
Washington, D. C. 20463

**BAKER, HOSTETLER, FROST & TOWERS**

818 CONNECTICUT AVE., N.W.

WASHINGTON, D.C. 20006

78040081123

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



FEDERAL ELECTION COMMISSION

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

June 8, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Steven Stockmeyer  
Executive Director  
National Republican Congressional Committee  
512 House Office Bldg. Annex  
Washington, DC 20515

Re: MUR 501

Dear Mr. Stockmeyer:

On May 17, 1978, the Federal Election Commission found reasonable cause to believe that the National Republican Congressional Committee violated 2 U.S.C. §434(b)(2) by failing to report the occupation and principal place of business of certain of its contributors.

Please be advised that the Commission has a duty to make every endeavor for a period of not less than 30 days to correct such a violation by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. §437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit. 2 U.S.C. §437g(a)(5)(B).

Enclosed please find a conciliation agreement which this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the

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provisions of this agreement, please sign it and return it to the Commission within ten days of your receipt of this letter. If not, please contact Clare Lindsay at 202-523-4040 to discuss your objections to the agreement.

Sincerely,

*William C. Oldaker*

William C. Oldaker  
General Counsel

Enclosure

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PS Form 3811, Nov. 1977

CL 501 ✓

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

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

2. ARTICLE ADDRESSED TO:  
*Mr. Steven Stockmayer*

3. ARTICLE DESCRIPTION:  
 REGISTERED NO. CERTIFIED NO. INSURED NO.  
 993020

(Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE  Addressee  Authorized agent  
*W. J. [Signature]*

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

JUN 12 1978  
 U.S. MAIL  
 CLERK'S OFFICE

© 1977 - GPO - 0-234-327

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
The National Republican ) MUR 501  
Congressional Committee )

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that the National Republican Congressional Committee violated 2 U.S.C. § 434(b)(2) by failing to report the occupation and principal place of business of certain of its contributors.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. The Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

A. Respondent received from the Commission requests for additional information dated September 23, 1976, and February 14, 1977, concerning inadequate or omitted occupation and inadequate or omitted principal place of business of contributors on certain of Respon-

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dent's reports of receipts and expenditures.

- B. During the course of the audit of the National Republican Congressional Committee, Respondent discussed with Commission's auditors the omission of occupation and principal place of business for certain of Respondent's contributors from Respondent's disclosure reports for 1975 and 1976 at which time Respondent was told it must make efforts to furnish this missing information.
- C. Respondent has not filed amendments for any of its 1975 and 1976 reports disclosing the omitted occupation and principal place of business information (occupation was omitted for approximately 57.5% of all itemized contributors and principal place of business was omitted for approximately 73.9% of all itemized contributors).

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 434(b)(2), a political committee is required to report the occupation and principal place of business for every contributor who contributes to that committee \$100 or more aggregate during the calendar year.

II. Respondent failed to report the occupation and principal place of business for certain of its contributors who contributed \$100 or more in the aggregate to the National Republican Congressional Committee in 1975 and 1976 in violation of 2 U.S.C. § 434 (b) (2).

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III. Respondent will pay a civil penalty in the amount of Eight Hundred (\$800) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

IV. Respondent will contact its contributors for 1975 and 1976 for which no occupation and/or principal place of business were reported in an effort to obtain such information. Respondent will report such information received on amended reports to be submitted to the Commission within 60 days of the signing of this agreement. Respondent will furnish to the Commission, within 30 days of the signing of this agreement, evidence of its efforts to comply with this condition of the Conciliation Agreement.

V. Respondent will comply with the provisions of 2 U.S.C. § 434(b)(2) on all future reports to the Commission.

General Conditions

I. The Commission shall, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1), concerning the matters at issue herein, or on its own motion, review compliance with this Agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

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III. It is mutually agreed that this agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

\_\_\_\_\_  
Date

\_\_\_\_\_  
William C. Oldaker  
General Counsel  
Federal Election Commission

\_\_\_\_\_  
Date

\_\_\_\_\_  
Steven Stockmeyer  
Executive Director  
National Republican Congressional  
Committee

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
The National Republican )  
Congressional Committee )

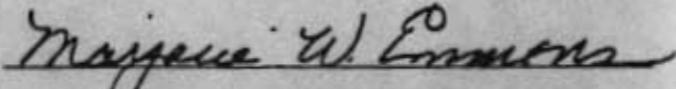
MUR 501

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on June 7, 1978, the Commission approved by a vote of 5-0 the amended Conciliation Agreement in the above-captioned matter attached to the memorandum from the General Counsel dated June 2, 1978.

Commissioners Aikens, Tiernan, Thomson, Harris and Staebler returned their votes by the deadline.

Date: 6-7-78

  
Marjorie W. Emmons  
Secretary to the Commission

Received in Office of Commission Secretary: 6-2-78, 1:23  
Circulated on 48 hour vote basis: 6-5-78, 10:30

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
The National Republican )  
Congressional Committee )

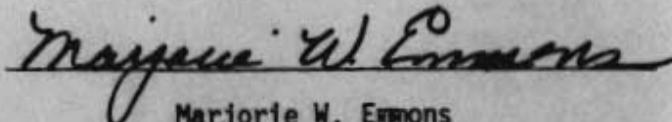
MUR 501

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on June 7, 1978, the Commission approved by a vote of 5-0 the amended Conciliation Agreement in the above-captioned matter attached to the memorandum from the General Counsel dated June 2, 1978.

Commissioners Aikens, Tiernan, Thomson, Harris and Staebler returned their votes by the deadline.

Date: 6-7-78

  
Marjorie W. Emmons  
Secretary to the Commission

Received in Office of Commission Secretary: 6-2-78, 1:23  
Circulated on 48 hour vote basis: 6-5-78, 10:30

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June 2, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 501

Please have the attached memo and conciliation agreement in MUR 501 distributed to the Commission on a 48 hour tally basis.

Thank you.

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FEDERAL ELECTION COMMISSION

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

June 2, 1978

MEMORANDUM

TO: THE COMMISSION

FROM: WILLIAM C. OLDAKER *W.C. Oldaker*

RE: MUR 501

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On May 17, 1978 the Commission voted to find reasonable cause to believe the National Republican Congressional Committee violated 2 U.S.C. §434(b) (2) by failing to report the occupation and principal place of business of certain of its contributors. The Commission further voted to send the letter and Conciliation Agreement attached to the General Counsel's Report subject to the amendment of the Conciliation Agreement.

An amended Conciliation Agreement is attached and re-circulated for your approval. The amendments consist primarily of the addition of Sections IV and V to the specific conditions of the Agreement.



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
National Republican  
Congressional Committee )

MUR 501

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on May 17, 1978, the Commission determined by a vote of 5-0 to take the following actions in the above-captioned matter:

1. Find reasonable cause to believe the National Republican Congressional Committee violated 2 U.S.C. Section 434(b)(2) by failing to report the occupation and principal place of business of certain of its contributors.
2. Send the letter and conciliation agreement attached to the General Counsel's Report signed May 12, 1978, subject to the amendments made by the General Counsel in the meeting of May 17, 1978, and the circulation of the amended conciliation agreement to the Commission for final approval.

Commissioner Thomson was not present at the time of the vote.

Date 5/19/78

Marjorie W. Emmons  
Marjorie W. Emmons  
Secretary to the Commission

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to send in amendments. A second RFAI was not sent.

On February 14, 1977, an RFAI was sent to the Committee, this time regarding the NRCC's year-end 1976 report. The Committee replied in March that occupations which were omitted from the NRCC's reports indicated that the Committee had not received that information from its contributor, but that when this information was provided it was reported. Regarding principal place of business, the Committee was in the process of developing a computer program which could report this information. In the meantime, according to the Committee, this information was available to Commission officials upon request.

At this time a member of the Reports Analysis Division's staff was told by a representative of the NRCC that, upon completion of the new computer program, occupation and principal place of business would be consistently reported in the future; however, the Committee's 1976 reports would not be amended because the cost of such project would be \$100,000.

The NRCC was told during this conversation that Reports Analysis could not grant a reporting waiver for occupation/principal place of business data on the 1976 reports. According to a Reports Analysis staffer, the NRCC representative seemed to believe that the NRCC would not be required to file amendments. There is no evidence that anyone at the Commission had ever led

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him to believe this was permissible.\*

Because the audit of the NRCC had commenced in February of 1977, the Reports Analysis Division, in early April of 1977, discontinued any plans to bring a compliance action against the Committee. The auditors anticipated, at that time, making the Committee's reporting deficiencies an audit finding. Again, no follow-up to the February 14th RFAI was sent to the Committee.

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During the course of the audit, the auditors conducted a 100% review of the NRCC's itemized contributions through January of 1977 and found that for 57.5% of the itemized contributions no occupation was reported, while for 73.9% of the itemized contributions no principal place of business was reported. When asked what their follow-up procedure was for obtaining the missing information, NRCC representatives replied that a standard solicitation letter was mailed regularly to each contributor and if the occupation and principal place of business (which were requested on the reply coupon) were provided,

\* On subsequent RFAI's (June 22 and July 29, 1977) the Reports Analysis Division added the following comments to the standard form, "The Commission recognizes your efforts in obtaining this information. However, we must continue to cite these omissions". This comment, as understood by the Reports Analysis Division and the Office of General Counsel, refers to the Committee's efforts to develop a new computer system, not efforts relating to the amendment of disclosure of contributors occupation and principal place of business on 1976 reports.

these items were reported. At the time of the audit, the auditors found no type of follow-up letter which pointed out to a contributor that he had neglected to provide required information and which requested that he promptly furnish it.

The auditors also requested access to the Committee's contributor records. These records were found at the offices of the Committee's hired computer service, unlabeled and in no discernable order. In attempting to test what information these contributor records contained, the auditors chose 101 samples of which 87 contained no occupation or principal place of business information. These same samples were traced back to the reports, where it was found that seven of the contributors with occupation on the contributor records did not have occupation data included on the reports filed with the Commission.

Although the Committee has never received a letter of audit findings, this reporting matter was taken up with the Committee at the audit exit conference. At this time, the Committee was told by the auditors that best efforts must be made to obtain the occupation and principal place of business for contributors on reports submitted up to the time of the audit and that their reporting deficiencies up to the time of the audit would be made an audit finding. The Committee requested a definition of the "best efforts" standard but was told by the auditors that this standard had not been defined.

Now the respondent Committee replies to the Commission's reason to believe notification that the NRCC was given no indication by the Commission that its efforts to comply with the reporting requirements did not meet the "best efforts" standard until the receipt of the letter of notification. The NRCC further

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claims that, if the Committee had been aware that they had not made "best efforts", further steps would have been taken to comply.

Analysis:

It is the opinion of this office that the NRCC was aware that its reports for 1976 were not in compliance with the Act's itemization requirements through its receipt of Commission requests for additional information. Further, it is also our opinion that the NRCC was aware that it had not met the "best efforts" standard by virtue of the auditor's suggestion to the Committee during the audit exit conference that the Committee should utilize its best efforts to obtain the occupations and principal place of business for its contributors, implying thereby that this had not already been done.

The Office of General Counsel believes that the NRCC did not make "best efforts" to obtain the required information for its 1976 reports, nor did the Committee intend to do so. We recognize that the Committee has developed a new computer program, at great expense, which has brought its recently filed reports into compliance. But the Committee's failure to comply with the Act's reporting requirements as regards the 1976 reports has not yet been corrected. We see no evidence of an initiative on the part of the Committee to obtain missing information regarding its contributors, much less amend the inadequate reports.

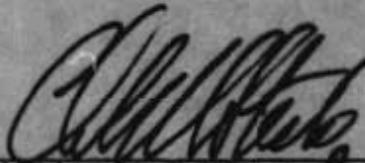
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Recommendation:

Find reasonable cause to believe the National Republican Congressional Committee violated 2 U.S.C. §434(b)(2) by failing to report the occupation and principal place of business of certain of its contributors. Send the attached letter and conciliation agreement.

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12 May 1978  
Date

  
\_\_\_\_\_  
William C. Oldaker  
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
The National Republican ) MUR 501  
Congressional Committee )

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that the National Republican Congressional Committee violated 2 U.S.C. §434(b)(2) by failing to report the occupation and principal place of business of certain of its contributors.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S. C. §437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. The Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

A. Respondent received from the Commission requests for additional information dated September 23, 1976, and February 14, 1977, concerning inadequate or omitted occupation and inadequate or omitted principal place of business of contributors on Respondent's reports of receipts and expenditures.

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- B. Respondent discussed the omission of occupation and principal place of business from Respondent's disclosure reports for 1975 and 1976, with Commission's auditors during the course of the audit.
- C. Respondent has not filed amendments for any of its 1975 and 1976 reports disclosing the omitted occupation and principal place of business information (occupation was omitted for approximately 57.5% of all itemized contributors and principal place of business was omitted for approximately 73.9% of all itemized contributors).

WHEREFORE, Respondent agrees that:

- I. Under 2 U.S.C. §434(b)(2), a political committee is required to report the occupation and principal place of business for every contributor who contributes to that committee \$100 or more aggregate during the calendar year.
- II. Respondent failed to report the occupation and principal place of business for certain of its contributors who contributed \$100 or more in the aggregate to the National Republican Congressional Committee in 1975 and 1976 in violation of 2 U.S.C. §434(b)(2).
- III. Respondent will pay a civil penalty in the amount of Eight Hundred (\$800) Dollars pursuant to 2 U.S.C. §437g(a)(5)(B).

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General Conditions

I. The Commission, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1), concerning the matters at issue herein, or on its own motion, review compliance with this Agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. §437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

\_\_\_\_\_  
Date

\_\_\_\_\_  
William C. Oldaker  
General Counsel  
Federal Election Commission

\_\_\_\_\_  
Date

\_\_\_\_\_  
Steven Stockmeyer  
Executive Director  
National Republican Congressional  
Committee

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79040121013



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Steven Stockmeyer  
Executive Director  
National Republican Congressional Committee  
512 House Office Bldg. Annex  
Washington, DC 20515

Re: MUR 501

Dear Mr. Stockmeyer:

On May , 1978, the Federal Election Commission found reasonable cause to believe that the National Republican Congressional Committee violated 2 U.S.C. §434(b)(2) by failing to report the occupation and principal place of business of certain of its contributors.

Please be advised that the Commission has a duty to make every endeavor for a period of not less than 30 days to correct such a violation by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. §437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit. 2 U.S.C. §437g(a)(5)(B).

Enclosed please find a conciliation agreement which this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the

provisions of this agreement, please sign it and return it to the Commission within ten days of your receipt of this letter. If not, please contact Clare Lindsay at 202-523-4040 to discuss your objections to the agreement.

Sincerely,

William C. Oldaker  
General Counsel

Enclosure

79040121015  
790401145



# National Republican Congressional Committee

812 HOUSE OFFICE BLDG. ANNEX • WASHINGTON, D.C. 20515 • TELEPHONE (202) 225-1800

Doc 3373

78 APR 28 AM 8:47

CHAIRMAN  
Guy Vander Jagt, M.C., Michigan  
EXECUTIVE DIRECTOR  
Steve Strohger

April 27, 1978

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

802212

Re: MUR 501

Dear Mr. Oldaker:

This letter is written in response to the letter dated March 29, 1977 which you wrote to Mr. George Olmsted, treasurer of the National Republican Congressional Committee ("NRCC"). The NRCC firmly believes that the Federal Election Commission's ("FEC") finding of reason to believe is unwarranted because the NRCC has never failed to meet the "best efforts" standard in compiling its reports. 2 U.S.C. § 434(b)(2); 11 C.F.R. § 102.9(e). Moreover, a computer system which was created for the NRCC at considerable expense and which is fully operational at the present time gives the NRCC a reporting and follow-up capability superior to any reporting political committee. In this letter, I will outline the steps taken by the NRCC in establishing its reporting system and will demonstrate that the NRCC at all times complied with the "best efforts" standard.

This submission does not constitute the NRCC's right to have "a reasonable opportunity to demonstrate that no action should be taken against it" as provided by 2 U.S.C. § 437g(a)(4). The NRCC believes that procedural due process and the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq., ("Act") mandate that the NRCC is entitled, inter alia, to a hearing before the FEC or a representative appointed by the FEC, the right to present witnesses and to cross examine witnesses presented by the General Counsel's office and the right to file pleadings and exhibits with the FEC itself rather than with the General Counsel's office. Submissions to the General Counsel's office are subjected to a filtering process before the information contained in said submissions is presented to

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### VICE CHAIRMEN

William L. Armstrong, M.C., Colorado  
Trest Lott, M.C., Mississippi  
Lawrence Coughlin, M.C., Pennsylvania  
Joel Pritchard, M.C., Washington  
Norman Lent, M.C., New York  
John Roussetot, M.C., California

### SECRETARY

John Paul Hammerschmidt, M.C., Arkansas

### EXECUTIVE COMMITTEE

Garry Brown, M.C., Michigan  
John T. Myers, M.C., Indiana  
J. Herbert Burke, M.C., Florida  
Charles Thone, M.C., Nebraska  
David F. Emory, M.C., Maine  
David C. Treen, M.C., Louisiana  
Edwin S. Forsythe, M.C., New Jersey  
Paul S. Tribble, Jr., M.C., Virginia  
James G. Martin, M.C., North Carolina  
Larry Winn, Jr., M.C., Kansas

William C. Oldaker, Esquire  
April 27, 1978  
Page Two

the FEC. Furthermore, the NRCC invokes its right to maintain the confidentiality of this proceeding pursuant to 2 U.S.C. § 437g(a)(3)(B).

On September 23, 1976, the NRCC received a form letter from Orlando B. Potter, Staff Director of the FEC. See Exhibit 1 attached hereto. This letter, which was the first indication that any of the NRCC's reports were not complete, stated that the NRCC's September, 1976 monthly report was incomplete because the "occupation description" and the "principal place of business" of each contributor of over \$100 in a calendar year was "inadequate or omitted." (Also, the letter indicated that the aggregate year to date totals had been omitted. The NRCC immediately resolved this problem by amending its reports). The NRCC's Legal Counsel promptly responded to Mr. Potter's letter and indicated that the NRCC had exercised its best efforts to supply this information. See Exhibit 2 attached hereto. At the time, the NRCC was reporting the information which it received concerning "occupation" and was compiling and storing the information concerning "principal place of business." The reason this information was not reported was that the NRCC's computer service bureau did not have the capability of compiling and reporting this information for the NRCC's approximately 300,000 contributors. Each contributor was re-solicited approximately every forty days and each solicitation contained a request for the required information. No further communication was received from the FEC concerning the September, 1976 report until March of this year.

On February 14, 1977, the FEC sent another form letter to the NRCC indicating that the reporting of "occupation description" and "principal place of business" on the 1976 year end report was "inadequate or omitted." See Exhibit 3 attached hereto. Again, the NRCC's Legal Counsel promptly responded to the letter and informed the FEC that occupations were reported when they were provided to the NRCC and that the NRCC had instructed its computer service bureau, Wiland & Associates Inc., to create a computer program which would provide the principal place of business information to the FEC. Furthermore, the FEC was informed that this computer program would be operational on May 1, 1977, and until it was put into operation the principal place of business information was available for inspection by the FEC at any time. See Exhibit 4 attached hereto. The

78040081147  
79040121017

William C. Oldaker, Esquire  
April 27, 1978  
Page Three

NRCC had over 300,000 contributors in the spring of 1977 (it now has in excess of 500,000 contributors).

Although not referenced in your March 29 letter and, therefore, not a part of MUR 501 because the NRCC has not received proper notification of such violations pursuant to 2 U.S.C. § 437g(a)(2), the NRCC received three additional letters concerning deficiencies in its reports relating to "occupation" and "principal place of business." See Exhibits 5, 6 and 7 attached hereto. These letters, which are dated June 22, 1977, July 29, 1977 and November 23, 1977, referenced the "April 10 Quarterly" report, the "July 10 Quarterly" report and the "October 10 Quarterly" report and "October 10 Quarterly - Amendment", respectively. The NRCC had fully explained its actions and the development of its computer program to the FEC in its responses to the September 23 and February 14 letters. Indeed, the FEC recognized that the NRCC was in the process of developing its extensive computer program because it added the following language to the bottom of page 2 of the June 22 letter and the bottom of Page 2 of the July 29 letter:

The Commission recognizes your efforts in obtaining this information. However, we must continue to cite these omissions.

The NRCC believed that it was unnecessary to respond to these additional letters because the FEC had acknowledged the NRCC's efforts to develop the computer program which is presently in use. Moreover, there was no indication in any of the letters that the NRCC was not in compliance with the "best efforts" standard.

The NRCC assumed that it had satisfied the FEC's inquiries because it did not receive any other communication concerning this subject until the March 29 notification letter. Indeed, the NRCC discussed this matter with representatives of the FEC during 1976 election cycle audit and was not informed that its efforts to comply were inadequate.

In light of the efforts of the NRCC to implement a reporting and follow-up computer program, it was extremely unfair of the FEC to initiate an MUR without further consultation with the NRCC. There was no attempt by the NRCC to hide from the FEC or the public reportable information. The

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7 9 0 4 0 1 2 1 0 1 9

difficulty lay in creating a manageable way to collect, store, seek for a second time and finally report the information for up to as many as 300,000 to 400,000 contributors. Obviously, the NRCC's problem was different than the problems confronting a candidate committee in a primary or general election. A system of recording the required information by hand and drafting a follow-up request is not feasible from a time or cost standpoint when a committee is dealing with such a large number of contributors. The only solution was to create a computer program which would compile, store and report the required information and which would also be capable of re-soliciting contributors when the required information was not submitted with the contribution. Wiland & Associates Inc. has perfected such a program at a cost of approximately \$50,000. The system went into partial operation on May 1, 1977, and information concerning occupation and principal place of business was compiled and stored by the computer. The NRCC's July 10, 1977 report was complete as to the identification of the occupation and principal place of business of each contributor who contributed more than \$100 and who provided the required information in that calendar quarter. The follow-up capability was added to the system in the fall of 1977 and the year end report for 1977 was prepared with the complete system in place. This report has been amended to reflect the further information gathered as a result of the follow-up efforts. In addition, the first quarter report for 1978 was also complete and the amendments containing additional information received as a result of the follow-up procedure are in the process of being prepared.

The system is capable of compiling, storing, reporting and making a second request for the information required by § 434(b)(2) when a contributor makes a contribution of \$100 or more. A copy of the follow-up letter is attached hereto as Exhibit 8. If a contributor's contributions in a calendar year aggregate more than \$100.00, the contributor's name, address and total amount of monies contributed is compiled, stored and then reported to the FEC. Upon the completion of the report, the above-mentioned follow-up letter (see Exhibit 8) is sent to this group of contributors whose contributions aggregated more than \$100 during the reporting period. When the responses containing the occupation and principal place of business data have

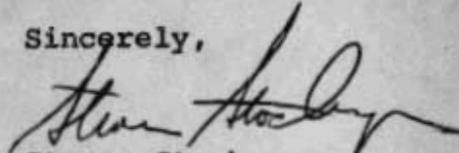
William C. Oldaker, Esquire  
April 27, 1978  
Page Five

been received and compiled, the NRCC's report is amended accordingly.

In sum, the NRCC was given no indication by the FEC that its efforts to comply with the reporting requirements did not meet the "best efforts" standard until the receipt of the March 29, 1978 letter. If such a communication had been received prior to the issuance of the MUR, the NRCC would have taken whatever steps were necessary to comply with the "best efforts" standard. Moreover, the NRCC has made a good faith effort to comply with the spirit and letter of the law by instructing Wiland & Associates Inc. to create the computer program which is now in place. While the Wiland system was being developed, any reportable data in the possession of the NRCC was always available for inspection by representatives of the FEC.

The NRCC believes that it has complied with the "best efforts" standard and that its present system is better than any system used by any other large reporting political committee. As a result, the NRCC respectfully asserts that the finding of reason to believe is totally unjustified and asks the FEC to dismiss MUR 501. Alternatively, the NRCC requests that the FEC inform it what steps it must take in order to meet the "best efforts" standard. (The NRCC is not aware of any action taken by the FEC which would give general guidance as to how the FEC defines "best efforts"). If there had been some staff communication with the NRCC prior to taking this matter formally to the Commissioners, there would have been no reason for the initiation of this administrative proceeding because the NRCC would have willingly, as it has always done, communicated with the staff and responded to any appropriate requests.

Sincerely,



Steven Stockmeyer  
Executive Director  
National Republican  
Congressional Committee

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79040121020

45172 JIC



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20515

23 September 1976

National Republican Congressional  
Committee  
Mr. George Olmsted, Treasurer  
512 House Office Building Annex #1  
Washington, D. C. 20515

Dear Mr. Olmsted:

This letter is prompted by our interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended.

During review of the September Monthly Report of Receipts and Expenditures, we noted that you omitted information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Clerk of the House's Office of Records and Registration, 1036 Longworth HOB, Washington, D.C. 20515 with the missing information within (10) days of receipt of this letter. If you have any questions, please do not hesitate to contact Suzanne Wilson (202-382-3484) our Reports Analyst assigned to you.

Sincerely,

Orlando B. Potter  
Staff Director

Attachment

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7 9 0 4 0 1 2 1 0 2 1



REQUEST FOR ADDITIONAL INFORMATION FOR THE September Monthly REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD Aug. 1, 1976 THROUGH Aug. 31, 1976, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

- Coverage dates omitted or incorrect
- Failure to Sign
- Identification Number (Use above FEC I.D.#)
- Incorrect or omitted total(s) on Summary Page Line \_\_\_\_\_ Column \_\_\_\_\_
- Incorrect or omitted total(s) on Detailed Summary Line \_\_\_\_\_ Column \_\_\_\_\_

OMISSION OF REQUIRED DATA ON RECEIPTS AND EXPENDITURES	Schedule Line	A	A	A	A	B	B	B	C	C	D
		15	16	17	18	20	21	23	25	26	15(
<input type="checkbox"/> Schedule totals <input type="checkbox"/> do not agree with Detailed Summary (Page 2) <input type="checkbox"/> Omitted											
<input type="checkbox"/> Dates inadequate or omitted											
<input type="checkbox"/> Full name omitted											
<input type="checkbox"/> Mailing address inadequate or omitted											
<input checked="" type="checkbox"/> Occupation description inadequate or omitted		X									
<input checked="" type="checkbox"/> Princpl. pl. bus. inadequate or omitted		X									
<input checked="" type="checkbox"/> Aggregate year-to-date totals omitted					X						
<input type="checkbox"/> Purpose of expenditure or receipt omitted											
<input type="checkbox"/> Inadequate description of <input type="checkbox"/> Proceeds <input type="checkbox"/> Dates <input type="checkbox"/> Event(s) and Location											
<input type="checkbox"/> Nature of debts and obligations omitted or inadequate											

OTHER:

Your initial submission, together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional information promptly with the Clerk of the House, Office of Records and Registration, 103 Longworth Bldg., Washington, DC 20515. If you have any questions regarding this request call the Reports Analysis Section (202/382-3484).

October 5, 1976

Mr. Orlando Potter  
Staff Director  
Federal Election Commission  
1325 K Street, N. W.  
Washington, D. C. 20463

Re: ID# CC0002931  
September Monthly Report

Dear Mr. Potter:

This is in response to your letter of September 23, 1976, received by us on September 27. In your letter, you request additional information with respect to the occupations and principal places of business for the Committee's Itemized contributors. Attached to this correspondence please find a copy of a letter from our treasurer to the Clerk of the House indicating that best efforts have been and will continue to be made to obtain the information. Our statements and reports will be amended accordingly.

Secondly, you note that aggregate year-to-date totals were omitted from entries on Schedule A, line 18. This was an inadvertent omission. The aggregate totals are the same as the amounts reported for that period. In the future, the identical amounts will be inserted in each column.

Sincerely,

Jan Bran  
Legal Counsel

78040081153  
79040121023



EC Form 3  
January 1976  
Paper of Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20453

Report of Candidate or Committee  
Supporting any Specific Party for  
Nomination or Election to Federal Office

RECEIVED  
1976 SEP 27 PM 3 20  
OFFICE OF THE CLERK  
U.S. HOUSE OF REPRESENTATIVES

State: Commission authorized by a candidate to receive contributions and make expenditures in connection with nomination or election to federal office. This report must be filed with the Commission within 10 days of the date of the election or nomination.

SEP 24 1976

1 (a) Name of Candidate or Committee (in full)  
**REGULAR MAIL**  
**NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE**

2 Identification Number  
**005118 (1976-1977)**

3 (a) Is this a report of a candidate or authorized candidate committee?  Yes  No  
 (b) If "Yes," for which election?  
 General, Primary, Runoff  Other

4 (a) Type of Report (Check appropriate box and complete, if applicable)  
 Amendment  July 18 report  
 April 10 Report  October 18 report  
 Tenth day report preceding election on \_\_\_\_\_ in the state of \_\_\_\_\_  
 (ordinary, general or special)  
 Thirtieth day report following election on \_\_\_\_\_ in the state of \_\_\_\_\_  
 (ordinary, general or special)

5 (a) Address (number and street)  
**512 HOUSE OFFICE BUILDING ANNEX #1**  
 (b) City, State and ZIP code  
**WASHINGTON, D. C. 20515**

6 (a) January 31 Report   
 (b)  Alternative Monthly Report **9/10/76**  
 (c)  Transmittal

Committee Summary of Receipts and Expenditures

7 Covering Period: From Aug 1 1976 through August 31 1976

	Column A - Cash Receipts	Column B - Cash Expenditures
8 Cash on hand January 1, 1976		0 1,573,217.71
9 Cash on hand at beginning of reporting period	01,051,537.03	
10 Add total receipts (from line 10)	01,175,547.33	0 8,405,526.01
(a) Subtotal	03,130,053.21	0 6,033,750.61
11 Subtract total expenditures (from line 24)	0 651,035.30	0 7,575,057.70
12 Cash on hand at close of reporting period	02,471,157.91	0 2,471,157.91
13 Cash on hand on hand to be liquidated (from line 12)		
<b>Section D - Expenditures Subject to Limitation Summary (Candidates and Authorized Candidate Committees Only)</b>		
14 Operating expenditures (from line 20)	0	0
15 Less Refunds and Rebates (from line 17)	0	0
16 (a) Expenditures subject to limitation	0	0
(b) Expenditures from prior years subject to limitation		0
(c) Total expenditures subject to limitation		0

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

*George Belmont*  
Signature of Treasurer or Candidate

10 August 1976

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 18 U.S.C. 1001 (text on reverse side of form).

For further information contact:  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20453

78020018106540



FEDERAL ELECTION COMMISSION

PB/3

1125 K STREET N.W.  
WASHINGTON, D.C. 20463

February 14, 1977

Mr. George Olmsted, Treasurer  
National Republican Congressional Committee  
512 House Office Building Annex #1  
Washington D.C. 20515

Dear Mr. Olmsted:

This letter is prompted by our interest in assisting House candidates and committees who wish to comply with the Federal Election Campaign Act, as amended.

During review of the Year-End 1976  
Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

The Federal Election Commission has the statutory responsibility to review, for compliance purposes, all Federal campaign disclosure documents, including those filed initially with the Clerk of the House. The Office of the Clerk, as an informational service, is notifying filers of errors and omissions found in their preliminary review of documents filed with the Clerk. Such notices are considered "House documents" and are kept confidential by the Clerk. This letter and attached documentation constitute official notification by the Commission of errors and omissions found, and require a written response.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Clerk of the House's Office of Records and Registration, 1036 Longworth HOB, Washington, D.C. 20515 with the missing information within ten (10) days of receipt of this letter. If you have any questions, please do not hesitate to contact Pamela Brown (202-382-3484) our Reports Analyst assigned to you.

Sincerely,

Orlando B. Potter  
Staff Director

Attachment



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78040121026

FOR ADDITIONAL INFORMATION FOR THE Year-End 1976 REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 11/23/76 THROUGH 12/31/76  
 UNDER THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

Review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

- Average dates omitted or incorrect
- Failure to Sign
- Identification Number (Use above FEC I.D.#)
- Incorrect or omitted total(s) on Summary Page Line(s) \_\_\_\_\_ Column(s) \_\_\_\_\_
- Incorrect or omitted total(s) on Detailed Summary Line(s) \_\_\_\_\_ Column(s) \_\_\_\_\_

MISSION OF REQUIRED DATA RECEIPTS AND EXPENDITURES	Schedule Line	A	A	A	A	B	B	B	C	C	D	E
		15	16	17	18	20	22	24	26	27	15(c)	2
Schedule totals ( ) do not agree with Detailed Summary (Page 2) ( ) Omitted												
Addresses inadequate or omitted												
All name omitted												
Billing address inadequate or omitted												
Occupation description inadequate or omitted		X										
Receipts of bus. inadequate or omitted		X										
Aggregate year-to-date totals omitted												
Purpose of expenditure or receipt omitted												
Inadequate description of ( ) Proceeds ( ) Dates ( ) Event(s) and Location												
Nature of debts and obligations omitted or inadequate												

Your initial submission, together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional information promptly with the Clerk of the House, Office of Records and Registration, 1036 Longworth Bldg., Washington, DC 20515. If you have any questions regarding this request call the Reports Analysis Section (202/382-3484).

# National Republican Congressional Committee

512 HOUSE OFFICE BUILDING • WASHINGTON, D.C. 20515 • TELEPHONE (202) 225-1000

CHAIRMAN  
Greg Vander Jagt, M.C., Michigan  
EXECUTIVE DIRECTOR  
Steven Stockmayer

15

March 14, 1977

Dear Mr. Denier:

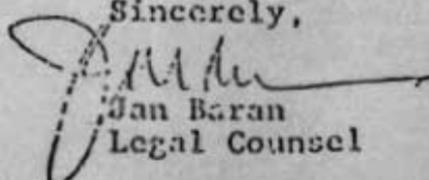
This letter is in response to our telephone conversation of March 8, during which time we discussed a letter from Orlando Potter to George Olmstead, Treasurer, dated February 14. That letter requested an explanation for the omission of certain occupations and places of business with respect to itemized contributors on the 1976 year-end report of the National Republican Congressional Committee.

As I stated to you over the phone, and as I have stated previously to Miss Suzanne Wilson of your office, the omission of an occupation for a contributor indicates that he or she has not given our Committee any such information. Occupations are reported when they are provided to us. We have made and will continue to make our best efforts to obtain this data for reporting purposes.

With respect to places of business, I have notified Miss Wilson, repeated to you, and now reiterate in this letter that we have instructed our computer contractor, Wiland & Associates of Culpeper, Va., to create a program, at significant expense to our Committee, which will provide to the Commission and the public the desired information in printout form. We have been told by Wiland that this new program will be operational by May 1 of this year. At such time, this data, when given to us by any of our more than 300,000 contributors, shall be keypunched and maintained by us in order to meet the demands of the federal election laws and the Federal Election Commission. Until that time, this information is available to Commission officials upon request. As in all other matters, this Committee shall exercise its best efforts to obtain the requisite data and report it.

If there are any further questions on this or any other subject, please let me know.

Sincerely,

  
Jan Baran  
Legal Counsel

Mr. Greg Denier  
Federal Election Commission  
1325 N. Street N.W.

78040081158  
79040121028



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463  
June 22, 1977

George Olmsted, Treasurer  
National Republican Congressional Committee-Contributions  
512 House Office Building Annex #1  
Washington, D.C.  
20515

Dear Mr. Olmsted:

This letter is prompted by our interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended.

During review of the April 10 Quarterly Report of Receipts and Expenditures, we noticed that you omitted information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within (10) days of receipt of this letter. If you have any questions, please do not hesitate to contact David U. Greevy (202-523-4048) our Reports Analyst assigned to you.

Sincerely,

Orlando B. Potter  
Staff Director

Attachment

78040081159  
79040121029



TO: National Republican Congressional Committee-Contributions DATE: June 22, 1977

I.D. NO.: C00002931

REQUEST FOR ADDITIONAL INFORMATION FOR THE April 10 Quarterly REPORT OF RECEIPTS  
AND EXPENDITURES COVERING THE PERIOD 2/1/77 THROUGH 3/31/77,  
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

Our review of the report indicates that additional information is needed in order to be considered complete. Please  
return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

- Coverage Dates  omitted or  incorrect
- Signature  omitted or  incorrect
- Summary Page Line(s)  Column(s)  Totals  omitted or  incorrect
- Detailed Summary (Page 2) Line(s)  Column(s)  Totals  omitted or  incorrect
- Schedule Totals  disagree with Detailed Summary (Page 2) or  omitted
- Date(s)  omitted or  inadequate for Schedule(s)  Line(s)
- Full Name(s) Omitted for Schedule(s)  Line(s)
- Mailing Address(es)  omitted or  inadequate for Schedule(s)  Line(s)
- Occupational Descriptions  omitted or  inadequate for Schedule(s) A Line(s) 15 \*
- Principal Place(s) of Business  omitted or  inadequate for Schedule(s) A Line(s) 15 \*
- Aggregate Year-to-date Totals  omitted or  inadequate for Schedule(s)  Line(s)
- Nature or Purpose of Expenditure  omitted or  inadequate for Schedule(s)  Line(s)
- Nature or Purpose of Receipt  omitted or  inadequate for Schedule(s)  Line(s)
- Inadequate Description of  proceeds  dates  events  location of Schedule
- Other:  The Commission recognizes your efforts in obtaining this information.

However, we must continue to cite these omissions.

Your initial submission(s), together with this request for additional information, has been made available for  
public inspection. The Commission urges you to file the additional submission(s) promptly to the above address.  
If you have any questions regarding this request, please call the Disclosure Division toll free at (800) 424-9530.  
The local Washington, D.C. telephone number is (202) 523-4048.

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St.,  
N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of  
Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20461  
July 29, 1977

George Olmsted, Treasurer  
National Republican Congressional Committee-Contributions  
Room 510 HOBA #1  
Washington, D.C.  
20515

Dear Mr. Olmsted:

This letter is prompted by our interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended.

During review of the July 10 Quarterly  
Report of Receipts and Expenditures, we noticed that you omitted information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within (10) days of receipt of this letter. If you have any questions, please do not hesitate to contact David U. Greevy (202-523-4048) our Reports Analyst assigned to you.

Sincerely,

*Orlando B. Potter*

Orlando B. Potter  
Staff Director

Attachment :

12



79040460001031

TO: National Republican Congressional Committee- DATE: July 29, 1977  
Contributions  
I.D. NO.: C00002931

REQUEST FOR ADDITIONAL INFORMATION FOR THE July 10 Quarterly REPORT OF RECEIPTS  
AND EXPENDITURES COVERING THE PERIOD 4/1/77 THROUGH 6/30/77,  
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

- Coverage Dates  omitted or  incorrect
- Signature  omitted or  incorrect
- Summary Page Line(s)  Column(s)  Totals  omitted or  incorrect
- Detailed Summary (Page 2) Line(s)  Column(s)  Totals  omitted or  incorrect
- Schedule Totals  disagree with Detailed Summary (Page 2) or  omitted
- Date(s)  omitted or  inadequate for Schedule(s)  Line(s)
- Full Name(s) Omitted for Schedule(s)  Line(s)
- Mailing Address(es)  omitted or  inadequate for Schedule(s)  Line(s)
- Occupational Descriptions  omitted or  inadequate for Schedule(s) A Line(s) 15 \*
- Principal Place(s) of Business  omitted or  inadequate for Schedule(s) A Line(s) 15 \*
- Aggregate Year-to-date Totals  omitted or  inadequate for Schedule(s)  Line(s)
- Nature or Purpose of Expenditure  omitted or  inadequate for Schedule(s)  Line(s)
- Nature or Purpose of Receipt  omitted or  inadequate for Schedule(s)  Line(s)
- Inadequate Description of  proceeds  dates  events  location of Schedule
- Other: \* The Commission recognizes your efforts in obtaining this information.

However, we must continue to cite these omissions.

Please See Page Two

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Disclosure Division toll free at (800) 424-9530. The local Washington, D.C. telephone number is (202) 523-4048.

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463  
November 23, 1977

George Olmsted, Treasurer  
National Republican Congressional Committee-Contributions  
Room 510, House Office Building Annex #1  
Washington, D.C.  
20515

Dear Mr. Olmsted:

This letter is prompted by our interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended.

October 10 Quarterly &

During review of the October 10 Quarterly-Amendment Report of Receipts and Expenditures, we noticed that you omitted information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within (10) days of receipt of this letter. If you have any questions, please do not hesitate to contact David U. Greevy (800-424-9530) our Reports Analyst assigned to you.

Sincerely,

Orlando B. Potter  
Staff Director

Attachment

12

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7 9 0 4 0 1 2 1 0 3 3



FEDERAL ELECTION COMMISSION

1325 K Street, N.W.  
Washington, D.C. 20463

DG/3

TO: National Republican Congressional Committee- DATE: November 23, 1977

Contributions I.D. NO.: C00002931

October 10 Quarterly-

REQUEST FOR ADDITIONAL INFORMATION FOR THE Amendment REPORT OF RECEIPTS  
AND EXPENDITURES COVERING THE PERIOD 7/1/77 THROUGH 9/30/77,  
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

Coverage Dates  omitted or  incorrect

Signature  omitted or  incorrect

Summary Page Line(s)  Column(s)  Totals  omitted or  incorrect

Detailed Summary (Page 2) Line(s)  Column(s)  Totals  omitted or  incorrect

Schedule Totals  disagree with Detailed Summary (Page 2) or  omitted

Date(s)  omitted or  inadequate for Schedule(s)  Line(s)

Full Name(s) Omitted for Schedule(s)  Line(s)

Mailing Address(es)  omitted or  inadequate for Schedule(s)  Line(s)

Occupational Descriptions  omitted or  inadequate for Schedule(s)  Line(s) 15

Principal Place(s) of Business  omitted or  inadequate for Schedule(s)  Line(s) 15

Aggregate Year-to-date Totals  omitted or  inadequate for Schedule(s)  Line(s)

Nature or Purpose of Expenditure  omitted or  inadequate for Schedule(s)  Line(s)

Nature or Purpose of Receipt  omitted or  inadequate for Schedule(s)  Line(s)

Inadequate Description of  proceeds  dates  events  location of Schedule

Other: Please See Page Two

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Disclosure Division toll free at (800) 424-9530. The local Washington, D.C. telephone number is (202) 523-4048.

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.



# National Republican Congressional Committee

P.O. BOX 1999 • WASHINGTON, D. C. 20013 • TELEPHONE (202) 225-1800

March 1, 1978

Mr. Frank N. Thomas  
143 Hind Drive  
Honolulu, Hawaii 96821

Dear Mr. Thomas:

Thank you very much for your recent contribution to the National Republican Congressional Committee. As Chairman, I can report that it couldn't have come at a better time.

Because of your help, we will be able to continue the extensive campaign programs of electing and re-electing Republicans to the U.S. House of Representatives that I wrote you about. It goes without saying that none of this would be possible without your past support and I am extremely grateful for your help.

However, in reviewing our records of your last contribution, we found them incomplete and I would appreciate it if you could take a moment and print the information needed in the space at the bottom of this letter, and then return the entire letter to me so that we can complete our records. I've enclosed an envelope for your convenience.

If you have any questions about our Committee, please feel free to use the envelope for that too. Thank you again for your help.

Sincerely,

*Guy Vander Jagt*  
Guy Vander Jagt, M.C.  
Chairman

GVJ/lb

The Federal Election Law requires us to request the following information:

Occupation Insurance Agent (Commission)

Place of Business Ins'l Ins. Co of Hawaii, Honolulu Hawaii  
(Please include city and state)

Please check if self employed

96821 THMS143F

79040121035



FEDERAL ELECTION COMMISSION

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

April 19, 1978

MEMORANDUM TO: CHARLES STEELE  
FROM: MARJORIE W. EMMONS *mwe*  
SUBJECT: MUR 501 (78) - Interim Report dated 4-14-78  
Received in Office of Commission  
Secretary: 4-14-78, 2:13

The above-mentioned document was circulated to the Commissioners at 10:00 a.m., April 18, 1978, on a 24 hour no-objection basis.

As of 10:00 a.m., this date, no objections have been received in the Office of Commission Secretary to the Interim Report.

Commissioner Staebler commented on the misspelled word in line four of the report. "principle" should be "principal." A copy of his vote sheet is attached.

78040081167  
79040121036

78 APR 27 P 6:03

FEDERAL ELECTION COMMISSION

'78 APR 28 AM 6:47

FROM:

**National Republican Congressional Committee**  
512 House Office Building Annex  
Washington, D.C. 20515

TO:

FEDERAL ELECTION COMMISSION  
OFFICE OF LEGAL COUNSEL  
attn. Clare Lindsay

78040081166  
79040121037

April 14, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 501

Please have the attached Interim Report on MUR 501 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

78040081168  
79040121038

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
National Republican  
Congressional Committee

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MUR 501(78)

INTERIM REPORT

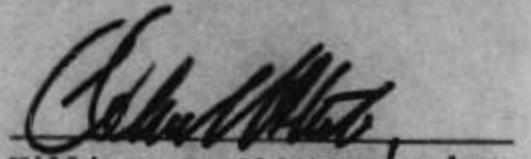
78040081169  
79040121039

On March 21, 1978, the Commission found reason to believe the National Republican Congressional Committee violated 2 U.S.C. § 434(b) (2) by failing to provide the occupation and principle place of business of certain of its contributors.

At this time, the Office of General Counsel is still awaiting the response of the National Republican Congressional Committee to the Commission's letter of notification which was delivered on April 3, 1978. A member of the staff has contacted the Committee and was informed that the Committee's response will be in the mail by April 13, 1978.

14 April 1978

DATE



William C. Oldaker *for Lucas*  
General Counsel

Hand delivered 4-18-78  
ACC # 3282 akw



# National Republican Congressional Committee

812 HOUSE OFFICE BLDG. ANNEX • WASHINGTON, D.C. 20515 • TELEPHONE (202) 225-1900

CHAIRMAN  
Guy Vander Jagt, M.C., Michigan  
EXECUTIVE DIRECTOR  
Steven Stockmayer

April 17, 1978

Dear Clare:

Pursuant to our telephone conversation, the National Republican Congressional Committee is preparing its response to the Commission regarding MUR 501.

The Committee hopes to submit its reply to the Commission by the end of this week or certainly by the beginning of next week.

Sincerely,

*Tom Josefjak*

Tom Josefjak  
Legal Counsel

78040081170  
79040121040

Weerah Bond  
25% COTTON FIBER

Ms. Clare Lindsay  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

TJ/aid

VICE CHAIRMEN

William L. Armstrong, M.C., Colorado  
Lawrence Coughlin, M.C., Pennsylvania  
Norman Lent, M.C., New York  
Trent Lott, M.C., Mississippi  
Joel Pritchard, M.C., Washington  
John Roussetot, M.C., California

SECRETARY

John Paul Hammerschmidt, M.C., Arkansas

EXECUTIVE COMMITTEE

Garry Brown, M.C., Michigan  
J. Herbert Burke, M.C., Florida  
David F. Emery, M.C., Maine  
Edwin B. Forsythe, M.C., New Jersey  
James G. Martin, M.C., North Carolina  
John T. Myers, M.C., Indiana  
Charles Thoms, M.C., Nebraska  
David C. Treen, M.C., Louisiana  
Paul S. Trible, Jr., M.C., Virginia  
Larry Winn, Jr., M.C., Kansas



National Republican Congressional Committee

512 HOUSE OFFICE BLDG. ANNEX WASHINGTON, D.C. 20515

Ms. Clare Lindsay  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

4003277

STILLWATER MEDICAL ASSOCIATES

1809 WEST 8TH

STILLWATER, OKLAHOMA 74074

(405) 372-2820

TIM K. SMALLEY, M.D.

SAM L. EARNEST, M.D.

APR 17 11:05

April 13, 1978

78040081172

Clare Lindsay  
Federal Election Commission  
1325 K Street N.W.  
Washington, D.C. 20463

801866

RE: MUR 502 (78)

Dear Mrs. Lindsay,

I called your office, April 11, 1978, and you were out for the day. The ladies told me to write you a letter and point out that Stillwater Medical Associates is not a corporation. We are a simple partnership.

Sincerely,

Tim K. Smalley, M.D.

TKS/sc

STILLWATER MEDICAL ASSOCIATES

1309 WEST 8TH

STILLWATER, OKLAHOMA 74074



178 APR 11 PM 1:06

Clare Lindsay  
Federal Election Commission  
1325 K Street N.W.  
Washington, D.C. 20463

780400810  
790401210



FEDERAL ELECTION COMMISSION

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

March 29, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

George Olmsted, Treasurer  
National Republican Congressional Committee  
512 House Office Building Annex  
Washington, D. C. 20515

Re: MUR 501

Dear Mr. Olmsted:

This letter is to notify you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has determined that it has reason to believe that a violation of 2 U.S.C. §434(b)(2) has occurred in that your Committee has failed to itemize the occupation and principle place of business of certain contributors, as brought to your attention by the Commission's Disclosure Division on September 23, 1976 and February 14, 1977.

Under 2 U.S.C. §434(b)(2) a committee's reports of receipts and expenditures must disclose the full name, mailing address, occupation and principle place of business of each person who contributes in excess of \$100 aggregate to that committee within the calendar year.

Upon making a determination that there is reason to believe that a violation has occurred, the Commission is required to make an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide evidence of your Committee's efforts to obtain the missing information that the Commission's Disclosure Division has requested of you.

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79040121044



We would appreciate your response within 10 days of receipt of this letter, as well as any factual or legal materials which you deem relevant to the Commission's investigation of this matter.

This letter of notification shall remain confidential in accordance with 2 U.S.C. §437g(a) (3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, (telephone number 202-523-4040 or toll free 800-424-9530.)

Sincerely yours,

*William C. Oldaker*

William C. Oldaker  
General Counsel

78040081175  
79040121045

75 Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

**Mr. 601 Lindsay**

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

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

2. ARTICLE ADDRESSED TO:  
**George Olmstead, Treas.  
 Natl Rep Cong Comm**

3. ARTICLE DESCRIPTION:  
 REGISTERED NO. CERTIFIED NO. INSURED NO.  
**943394**

(Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE  Addressee  Authorized agent  
*[Signature]*

4. DATE OF DELIVERY  
**3/31/78**

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS  
**SM**

WASHINGTON, DC  
 APR 1 1978  
 MAIL ROOM  
 NO. 2

☆ 609-182-O-234-337

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
National Republican )  
Congressional Committee ) MUR 501(78)  
 )

CERTIFICATION

78040081176  
79040121045

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on March 21, 1978, the Commission accepted the General Counsel's recommendations as follows:

1. Find reason to believe the National Republican Congressional Committee has violated 2 U.S.C. §434 (b) (2) by failing to provide the occupation and principle place of business of certain of its contributors.
2. Send the proposed letter attached to the First General Counsel's Report.

Commissioner Springer recused himself in this matter.

*Marjorie W. Emmons*  
Marjorie W. Emmons  
Secretary to the Commission

Date: 3-22-78

Report dated:	3-17-78
Received in Commission Secretary's Office:	3-17-78, 4:08
Circulated on 24 hour no-objection basis:	3-20-78, 4:30

March 17, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 501

Please have the attached 7 day report on MUR 501 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

78040081177  
79040121047

FEDERAL ELECTION COMMISSION  
1325 K Street N.W.  
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION MAR 17 1978

MUR NO. 501  
DATE COMPLAINT RECEIVED  
BY OGC \_\_\_\_\_

ATTORNEY Lindsay

COMPLAINANT'S NAME: Internal (Audit)

RESPONDENT'S NAME: National Republican Congressional Committee

RELEVANT STATUTE: 2 U.S.C. §434(b)(2)

INTERNAL REPORTS CHECKED: Audit findings

FEDERAL AGENCIES CHECKED:

SUMMARY OF ALLEGATIONS

That the National Republican Congressional Committee failed to exercise its best efforts to itemize contributor occupation and principle place of business on contributions in excess of \$100, in violation of 2 U.S.C. § 434(b)(2).

PRELIMINARY LEGAL ANALYSIS

During the course of auditing the National Republican Congressional Committee, ("the Committee"), the auditors found the Committee was not consistently reporting the occupation and principle place of business of contributors giving in excess of \$100 per year as required by 2 U.S.C. § 434 (b)(2). The audit staff estimated, on the basis of a 100% review of contributions, that no occupation was reported for 57.5% of contributors and no principle place of business was reported for 73.9% of contributors.

Furthermore, the Committee had no follow-up procedure to obtain missing information.

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Requests for additional information were made to the Committee by the Disclosure Division in September, 1976 and February, 1977. No response was received other than that the Committee was incapable of providing the information omitted on the 1975 and 1976 reports without entailing great expense and that their computer is being programmed now to store this information for future disclosure.

This case was originally handled by the Disclosure Division but, when the audit was initiated, Disclosure discontinued compliance action pending the Committee's inability to provide the required information being made part of the audit findings.

RECOMMENDATION

Find reason to believe the National Republican Congressional Committee has violated 2 U.S.C. § 434(b)(2) by failing to provide the occupation and principle place of business of its contributors. See attached letter.

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*Browning*  
A-170

MUR 501



FEDERAL ELECTION COMMISSION

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

February 15, 1978

MEMORANDUM

TO: WILLIAM C. OLDAKER  
THROUGH: ORLANDO B. POTTER *OBP*  
FROM: *RKC* BOB COSTA/JOANNE MCSORLEY *JMS*  
SUBJECT: AUDIT REPORT OF THE NATIONAL REPUBLICAN  
CONGRESSIONAL COMMITTEE

On October 25, 1977, the Audit Division received a legal analysis from your office on the National Republican Congressional Committee audit report (copy attached). The analysis indicated that an audit finding concerning the non-reporting of occupation and principal place of business for contributors contributing in excess of \$100 was under consideration for possible compliance treatment. To date, the Audit Division has not been notified that a MUR has been initiated. Please inform the Audit Division of the course of action being taken on this matter so that it can be appropriately noted in the final audit report.

If you have any questions, please contact Joanne McSorley or Ray Lisi at Extension 3-4155.

Attachment as stated

78040081100  
79040121050





FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20463

October 25, 1977

MEMORANDUM

TO: The Commission

THRU: Orlando B. Potter *OB.P.*

FROM: William C. Oldaker *W.C.O.*

SUBJECT: Audit Report of the National Republican  
Congressional Committee

The Office of General Counsel has reviewed the report by the Audit Division concerning an audit of the National Republican Congressional Committee conducted pursuant to 2 U.S.C. §438(a)(8), and has the following comments on the matters discussed therein.

The audit disclosed a Committee checking account called REACH (Republican Extra Assistance for Communications Help) which expended almost \$300,000 during 1975, most of which was to defray recording service expenses for Republican members of the House of Representatives. The activities of the REACH account were not included in the Committee's reports filed in 1975, although the Committee has now filed amended reports (in May of 1977) which contain this information. While we concur in the recommendation of the Audit Division that no further action is required, we believe that the Committee's failure to report such a large amount of financial activity in a timely manner is of potential seriousness, and this matter should therefore be noted in the cover letter to the Committee which will accompany the audit report.

The report states that during the period covered by the audit the Committee was provided free office space and furnishings in a Government office building which it did not report as an in-kind contribution; the Audit Division recommends that the Committee either report the fair market value of the space and furnishings, or reimburse the contributor in this amount. With this situation before it, the Commission determined on September 22, 1977 that the Federal Government did not have the capacity



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to make a "contribution" as defined by the Act. Accordingly, we recommend that the Committee not be required to report or repay the fair market value of its free Government office space and furnishings.

The audit report further states that the Committee is not reporting the occupation and principal place of business of contributors in excess of \$100 during a calendar year, as required by 2 U.S.C. §434(b)(2). Upon our request to the audit staff for the approximate percentage of the Committee's reported contributors which did not have this information, we understand that a 100% review was undertaken, which disclosed the following percentages of non-reported information: in the case of contributor occupation, 57.5%; in the case of principal place of business, 73.9%. (We suggest that these figures be included in the audit report.) If required contributor information was not received, the Committee did not request the contributor to supply the missing information, by letter or any other manner. The determination of the Audit Division is that the Committee is not using its best efforts to obtain the missing information, and therefore it is recommended that the Committee send follow-up letters requesting the missing information, and file amended reports containing the information received. This Office does not believe the Committee has made any efforts at all, much less the "best efforts" required by 2 U.S.C. §434(b), to obtain and report the required contributor information. This matter is under consideration by our enforcement section for possible compliance treatment.

In the case of the non-itemization of expenditures over \$100 and the non-reporting of petty cash funds as cash on hand, we concur in the recommendations of the Audit Division that, since the Committee has filed amended reports correcting these errors, no further action is necessary.

We believe that the existence of a compliance matter involving the Committee (MUR 306(76)) should be noted in the audit report, perhaps under the category of "Other Matters".

78040081182  
79040121052



FEDERAL ELECTION COMMISSION

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

sent to OC-C  
June 23, 1977

FEDERAL ELECTION COMMISSION  
REPORT OF THE AUDIT DIVISION  
ON THE  
National Republican Congressional Committee

I. Background

This report covers an audit of the National Republican Congressional Committee ("the Committee"), undertaken by the Audit Division of the Federal Election Commission in accordance with the Commission's audit policy to determine whether there has been compliance with the provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The audit was conducted pursuant to 2 U.S.C. 438(a)(8) which directs the Commission to "make from time to time audits and field investigations with respect to reports and statements filed under the provisions of this chapter . . ."

The Committee registered with the Clerk of the U.S. House of Representatives on April 17, 1972. The principal officers of the Committee at the time of the audit were the Honorable Guy Vander Jagt, Chairman, and George Olmsted, Treasurer. The Committee maintains its headquarters in Washington, D.C.

The audit covered the period January 1, 1975 through January 31, 1977, the final coverage date of the latest report filed by the Committee at the time of the audit. During the period the Committee reported \$348,824.56 in beginning cash, total receipts of \$12,574,609.92, total expenditures of \$9,250,520.46 and ending cash of \$3,672,914.02.

This audit report is based on documents and working papers supporting each of its factual statements. They form part of the record upon which the Commission will base its decisions on the matters in this report and are available to Commissioners and appropriate staff for review.

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79040121053



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During the course of the audit, it was determined that the Committee is provided office furniture and quarters in Cannon House Office Building, Annex #1 at no cost. Providing services of this nature would normally constitute a contribution in-kind to the Committee from the organization owning or occupying the building.

Recommendation

The staff recommends that the Committee be required to assign a reasonable value to the use of this office space and furnishings for the period January 1, 1975 until the time of relocation and report it as a contribution in-kind in accordance with Section 434(b)(2) of the Act or compensate the contributor in an amount equal to the assigned value.

\* (c) Occupation and Principal Place of Business Not Reported

Section 434(b)(2) of Title 2 United States Code requires that a committee report the full name and mailing address (occupation and principal place of business, if any) of each person who has made one or more contributions to or for such committee within the calendar year in an aggregate amount in excess of \$100.00.

A review of contributor records and reports filed by the Committee reveals that occupation and principal place of business are not being disclosed as required by the Act. The Committee explained that all solicitation material requested occupation and principal place of business. When a contributor did not provide the information, a follow-up letter was not sent requesting the missing information. Committee officials explained that the contributor would be solicited again in the future using the same type of solicitation form. In addition, the Committee's computer program at the time of the audit did not provide a position for principal place of business but they indicated it would be programed to include it as of May 1, 1977.

Recommendation

Based on this information it is our determination that the Committee is not using its best efforts to obtain the missing information. We recommend that the Committee send follow up letters to the contributors requesting the missing information and file amended reports to include the information received.

78040081184  
79040121054



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

George Olmsted, Treasurer  
National Republican Congressional Committee  
512 House Office Building Annex  
Washington, D. C. 20515

Re: MUR 501

Dear Mr. Olmsted:

This letter is to notify you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has determined that it has reason to believe that a violation of 2 U.S.C. §434(b)(2) has occurred in that your Committee has failed to itemize the occupation and principle place of business of certain contributors, as brought to your attention by the Commission's Disclosure Division on September 23, 1976 and February 14, 1977.

Under 2 U.S.C. §434(b)(2) a committee's reports of receipts and expenditures must disclose the full name, mailing address, occupation and principle place of business of each person who contributes in excess of \$100 aggregate to that committee within the calendar year.

Upon making a determination that there is reason to believe that a violation has occurred, the Commission is required to make an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide evidence of your Committee's efforts to obtain the missing information that the Commission's Disclosure Division has requested of you.



79040121055

We would appreciate your response within 10 days of receipt of this letter, as well as any factual or legal materials which you deem relevant to the Commission's investigation of this matter.

This letter of notification shall remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, (telephone number 202-523-4040 or toll free 800-424-9530.)

Sincerely yours,

William C. Oldaker  
General Counsel

79040121056



FEDERAL ELECTION COMMISSION

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

February 15, 1978

MEMORANDUM

TO: WILLIAM C. OLDAKER

THROUGH: ORLANDO B. POTTER *OBP*

FROM: *RC* BOB COSTA/JOANNE MCSORLEY *JMS*

SUBJECT: AUDIT REPORT OF THE NATIONAL REPUBLICAN  
CONGRESSIONAL COMMITTEE

78040061187  
79040121057

On October 25, 1977, the Audit Division received a legal analysis from your office on the National Republican Congressional Committee audit report (copy attached). The analysis indicated that an audit finding concerning the non-reporting of occupation and principal place of business for contributors contributing in excess of \$100 was under consideration for possible compliance treatment. To date, the Audit Division has not been notified that a MUR has been initiated. Please inform the Audit Division of the course of action being taken on this matter so that it can be appropriately noted in the final audit report.

If you have any questions, please contact Joanne McSorley or Ray Lisi at Extension 3-4155.

Attachment as stated





FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20463

October 25, 1977

MEMORANDUM

TO: The Commission

THRU: Orlando B. Potter *OBP.*

FROM: William C. Oldaker *W.C. Oldaker*

SUBJECT: Audit Report of the National Republican  
Congressional Committee

The Office of General Counsel has reviewed the report by the Audit Division concerning an audit of the National Republican Congressional Committee conducted pursuant to 2 U.S.C. §438(a)(8), and has the following comments on the matters discussed therein.

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The report states that during the period covered by the audit the Committee was provided free office space and furnishings in a Government office building which it did not report as an in-kind contribution; the Audit Division recommends that the Committee either report the fair market value of the space and furnishings, or reimburse the contributor in this amount. With this situation before it, the Commission determined on September 22, 1977 that the Federal Government did not have the capacity



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79040121058

to make a "contribution" as defined by the Act. Accordingly, we recommend that the Committee not be required to report or repay the fair market value of its free Government office space and furnishings.

The audit report further states that the Committee is not reporting the occupation and principal place of business of contributors in excess of \$100 during a calendar year, as required by 2 U.S.C. §434(b)(2). Upon our request to the audit staff for the approximate percentage of the Committee's reported contributors which did not have this information, we understand that a 100% review was undertaken, which disclosed the following percentages of non-reported information: in the case of contributor occupation, 57.5%; in the case of principal place of business, 73.9%. (We suggest that these figures be included in the audit report.) If required contributor information was not received, the Committee did not request the contributor to supply the missing information, by letter or any other manner. The determination of the Audit Division is that the Committee is not using its best efforts to obtain the missing information, and therefore it is recommended that the Committee send follow-up letters requesting the missing information, and file amended reports containing the information received. This Office does not believe the Committee has made any efforts at all, much less the "best efforts" required by 2 U.S.C. §434(b), to obtain and report the required contributor information. This matter is under consideration by our enforcement section for possible compliance treatment.

In the case of the non-itemization of expenditures over \$100 and the non-reporting of petty cash funds as cash on hand, we concur in the recommendations of the Audit Division that, since the Committee has filed amended reports correcting these errors, no further action is necessary.

We believe that the existence of a compliance matter involving the Committee (MUR 306(76)) should be noted in the audit report, perhaps under the category of "Other Matters".

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79040121059



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 501

Date Filmed 4/26/79 Camera No. --- 2

Cameraman SPC

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