



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 691

Date Filmed 4/25/79 Camera No. --- 2

Cameraman BPC



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20461

October 19, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire
Sedam and Herge
7600 Old Springhouse Road
McLean, Virginia 22101

Re: MUR 691(78)

Dear Mr. Herge:

On October 16, 1978, the Commission determined that there was reasonable cause to believe that the National Conservative Political Action Committee violated 2 U.S.C. 441a.(1)(2)(A) by exceeding the \$5000 limitation imposed thereon on contributions to a candidate or committee by a multi-candidate political committee.

However, based on your voluntary efforts to expeditiously correct the violation, the Commission has also determined to take no further action and is closing its file in this matter.

If you have any questions, please feel free to contact Gary D. Lipkin, the attorney assigned to this matter at 523-4529.

Thank you for your cooperation.

Sincerely yours

William C. Oldaker
General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 691 (78)
National Conservative Political)
Action Committee)

CERTIFICATION

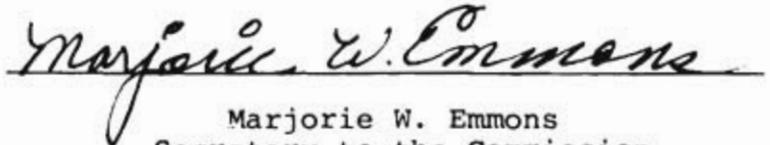
I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on October 16, 1978, the Commission determined by a vote of 6-0 to adopt the following recommendations, as set forth in the General Counsel's Report dated October 10, 1978, regarding the above-captioned matter:

1. Find reasonable cause to believe that NCPAC violated 2 U.S.C. 441a(a)(2)(A), but take no further action and close the file.
2. Send the letter attached to the above-named report.

Attest:

10/16/78

Date


Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: 10-12-78, 12:40
Circulated on 48 hour vote basis: 10-12-78, 4:00

7904011503

October 12, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 691

Please have the attached General Counsel's Report on MUR 691 distributed to the Commission on a 48 hour tally basis.

Thank you.

79040115033

RECEIVED
OFFICE OF THE
COMMISSIONER

BEFORE THE FEDERAL ELECTION COMMISSION
October 10, 1978.

78 OCT 12 P12:40

In the Matter of the)
)
National Conservative Political) MUR 691 (78)
Action Committee)

GENERAL COUNSEL'S REPORT

SUMMARY OF ALLEGATIONS

70040110602
This internally generated matter was referred to the Office of the General Counsel on August 17, 1978 by the Reports Analysis Division, because it appeared that the respondent, the National Conservative Political Action Committee (hereinafter, NCPAC) had exceeded the \$5000 contribution limitation established by 2 U.S.C. 441a(a)(2)(A) in making a combination of loans and contributions to the Friends of Don Lyons Committee. Our analysis of NCPAC's reports showed that for the period between January 26 and February 21, 1978, NCPAC exceeded the \$5000 limitation by \$994.50. Accordingly, on September 13, 1978, the Commission found reason to believe that 2 U.S.C. 441a(a)(2)(A) was violated.

PERTINENT FACTS

NCPAC's reports set out the series of transactions involved here. These transactions were discussed in our First General Counsel's Report of September 11, 1978. In response to the Commission's finding of reason to believe, NCPAC, through counsel, has submitted evidence, which, while not showing that no violation occurred, did show that the violation involved a smaller amount of money over a shorter period of time.

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NCPAC has not denied the substance of the allegations or challenged the amounts of the loan and contributions. In compiling the materials necessary to file NCPAC's January, 1978 reports, the treasurer realized that \$50 of the salary paid to a NCPAC worker had to be allocated to the Lyons campaign as a contribution. Realizing that this contribution placed them in excess of their permissible \$5000 contribution limit, the treasurer and chairman of NCPAC made arrangements during the first week of February to have a portion of the January 26th \$5000 postage loan to the Lyons campaign repaid (see affidavit). Accordingly, the Lyons campaign, on February 7, 1978 drew a check, payable to the order of NCPAC, for \$1500 (see affidavit and check, attached). This check was received by NCPAC on or about February 11, 1978 but was not deposited until February 21, 1978. According to AO 1975-22, physical control of a check by the treasurer of a political committee establishes receipt of the proceeds. Thus for the 16 days between the making of the \$5000 loan and NCPAC's receipt of the \$1500 check from the Lyons committee, the respondent exceeded the \$5000 limit on contributions by just \$50.

ANALYSIS

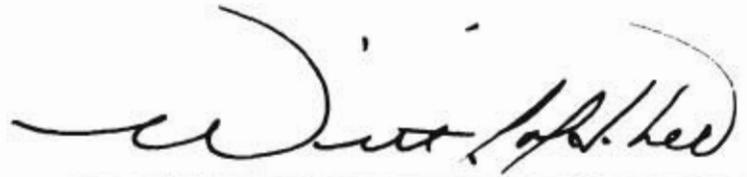
In light of the advisory opinion noted above (AO 75-22) it is clear that NCPAC voluntarily returned to full compliance with the Act by February 11, 1978. NCPAC's contention that this incident was "innocent and inadvertent" gains credence when one considers the speed with which it was corrected and the full reporting thereof. In light of the de minimus nature of the violation and NCPAC's voluntary attempt to comply with the Act,

we recommend that the Commission find reasonable cause to believe a violation did occur but take no further action and close the file.

RECOMMENDATION

1. Find reasonable cause to believe that NCPAC violated 2 U.S.C. 441a(a)(2)(A), but take no further action and close the file.
2. Approve the attached letter.

10/11/28
Date


William C. Oldaker
General Counsel

ATTACHMENTS

1. Letter from counsel for NCPAC
2. Affidavit
3. Copy of check
4. Letter

79040113030

SEDAM & HERGE

ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
MCLEAN, VIRGINIA 22101

(703) 821-1000

RECEIVED
FEDERAL ELECTION
COMMISSION

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806578
LIPKIN
2

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1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE

THOMAS M. DAVIS, III
MICHAEL D. HUGHES
ROBERT R. SPARKS, JR.
CHRISTOPHER M. WAS

September 27, 1978

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

Re: MUR 691(78)

Dear Mr. Oldaker:

This letter is written in response to your letter to Miss Becki A. Cecil, Treasurer of National Conservative Political Action Committee, dated September 15, 1978, in which it was noted that the Federal Election Commission had found reason to believe that that Committee may have violated 2 U.S.C. 441a(a)(2)(A) by making a combination of loans and contributions to the Friends of Don Lyon Committee in excess of \$5,000.00. We have been engaged by the National Conservative Political Action Committee (hereinafter "NCPAC") to represent it in this matter, which you have designated MUR 691(78).

As set forth in the attached affidavit of Miss Cecil, the facts of this matter are, as follows:

1. NCPAC is a political committee as defined in the Federal Election Campaign Act of 1971, as amended (hereinafter the Act), which has registered with the Federal Election Commission and which has qualified as a multi-candidate committee under the Act.
2. NCPAC files its reports of receipts and expenditures monthly. 2 U.S.C. 434(a)(3).
3. On January 26, 1978, NCPAC paid the sum of \$5,000.00 to the United States Postmaster, that sum being intended to be applied toward the cost of postage expenses to be incurred by the Friends of Don Lyon in connection with a mass mailing program. This sum was a loan from NCPAC to Friends of Don Lyon and, as such, was an in-kind contribution. 2 U.S.C. 431(e) and 441a(a)(2)(A).

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4. Subsequently, in compiling the material necessary to prepare NCPAC's report of receipts and expenditures for the month of January, 1978, it was discovered that a portion (\$50.00) of the salary paid by NCPAC to Carolyn Ferrell in January had to be properly allocated to Friends of Don Lyon as an in-kind contribution. As a result, the aggregate in-kind contribution made by NCPAC to Friends of Don Lyon totaled \$5,050.00.

5. The Treasurer of NCPAC promptly called this error to the attention of the Chairman of NCPAC, John T. Dolan. Mr. Dolan then made arrangements with a representative of Friends of Don Lyon to have a portion of the \$5,000.00 loan repaid to NCPAC. Upon information and belief, those arrangements were made during the first week of February, 1978.

6. On February 7, 1978, Friends of Don Lyon drew a check in favor of NCPAC in the amount of \$1,500.00 in partial repayment of the \$5,000.00 loan. A copy of that check is attached to the affidavit of Miss Cecil as Exhibit A. [Upon information and belief, Friends of Don Lyon recorded in its report to the Commission that that check was disbursed to NCPAC on February 7, 1978.]

7. To the best of Miss Cecil's recollection, the \$1,500.00 check from Friends of Don Lyon was received by Miss Cecil on or about the 11th day of February, 1978 and, in any event, prior to February 13, 1978. As a result, the aggregate in-kind contribution made by NCPAC to Friends of Don Lyon had been reduced to \$3,550.00 by February 13, 1978.

8. On February 13, 1978, NCPAC paid the sum of \$944.50 to Promotional Creations, Inc. for the production of a television program for Friends of Don Lyon. That payment constituted an in-kind contribution to Friends of Don Lyon.

It is evident from the foregoing statement of facts that no additional action is justified or warranted in this matter. On January 26, 1978, NCPAC made an in-kind contribution to Friends of Don Lyon in the form of a \$5,000.00 loan. It was not until the close of the January, 1978 reporting period that NCPAC came to the realization that an incidental portion of an individual's salary also had to be allocated as an in-kind contribution to Friends of Don Lyon. Upon that realization, NCPAC immediately got in touch with representatives of Friends of Don Lyon and arranged for the prompt repayment of a portion of the \$5,000.00 loan. That

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repayment, in the amount of \$1,500.00, was drawn on February 7, 1978 and received by NCPAC on or about February 11, 1978. Thus, it must be assumed that corrective action was properly taken within the framework and time period prescribed by the Commission in 11 CFR §103.3(b).

By reason of the reimbursement of \$1,500.00, the aggregate contribution made by NCPAC to Friends of Don Lyon prior to February 13, 1978 was \$3,550.00. The fact that that check was not deposited by the Treasurer of NCPAC until February 21, 1978 does not change this conclusion. Physical control of a check by the treasurer of a political committee establishes receipt of the proceeds. See AO 1975-22, 40 FR 45295, October 1, 1975. Furthermore, 11 CFR §103.3(a) requires that payments be deposited within ten days of the treasurer's receipt thereof. The \$1,500.00 check from Friends of Don Lyon to NCPAC was deposited within the requisite ten-day period of receipt.

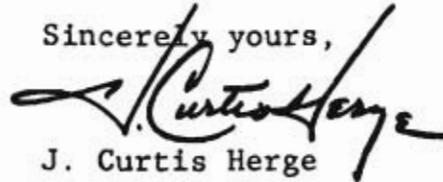
As a consequence, when NCPAC made the \$944.50 payment to Promotional Creations, Inc. on February 13, 1978, which payment constituted an in-kind contribution to Friends of Don Lyon, it did so with the knowledge that its aggregate contribution to Friends of Don Lyon thereupon amounted to \$4,494.50.

In reviewing this matter, it is respectfully requested that the Federal Election Commission do so in light of the applicable and relevant policy considerations. When NCPAC discovered at the close of its January, 1978 reporting period that it had inadvertently made in-kind contributions to Friends of Don Lyon which totaled \$5,050.00, the mistake was corrected promptly and straightforwardly in accordance with the advice given by the Commission to candidates and political committees in its various publications. The mistake was fully and openly reported and corrective action was taken within the framework prescribed in 11 CFR §103.3(b). The fact that the mistake was innocent and inadvertent can be appreciated when one considers that part of the contribution was made by drawing a check (the direct act of the Treasurer) and that the balance of the contribution was in the nature of services rendered by another (an act which did not come to the attention of the Treasurer until after the close of the reporting period). It is suggested, therefore, that the corrective actions taken by NCPAC under the circumstances are actions that should be encouraged by the Commission without penalty.

William C. Olden, Esq.
Page Four
September 27, 1978

We appreciate this opportunity to respond to your letter and look forward to being of further assistance to you should you require any additional information.

Sincerely yours,



J. Curtis Herge

Attachment

cc: Gary D. Lipkin, Esq.
Federal Election Commission

79040113041

STATE OF VIRGINIA)
COUNTY OF FAIRFAX) SS:

BECKI A. CECIL, being duly sworn, deposes and says:

1. That she is Treasurer of National Conservative Political Action Committee (hereinafter "NCPAC") and that she makes this statement of her own free will to assist the Federal Election Commission in its consideration of the matter which has been designated as MUR 691(78).

2. That NCPAC is a political committee as defined in the Federal Election Campaign Act of 1971, as amended, which has registered with the Federal Election Commission and which has qualified as a multi-candidate committee under the Act.

3. That NCPAC files its reports of receipts and expenditures with the Federal Election Commission on a monthly basis.

4. That, on January 26, 1978, NCPAC paid the sum of \$5,000.00 to the United States Postmaster, such sum being a loan to Friends of Don Lyon for use by that committee in meeting the postage expenses of a mass mailing program.

5. That, in the first week of February, 1978, when compiling the material necessary to prepare the NCPAC report of receipts and expenditures for the month of January, 1978, it came to my attention that the sum of \$50.00 had to be allocated as an in-kind contribution by NCPAC to Friends of Don Lyon, such sum being a portion of the salary paid by NCPAC to Carolyn Ferrell in January, 1978.

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6. That, upon realization of the facts set forth in paragraph 5, I called the matter to the attention of the Chairman of NCPAC, John T. Dolan, who, upon information and belief, made arrangements to have Friends of Don Lyon immediately repay a portion of the \$5,000.00 loan described in paragraph 4.

7. That, to the best of my recollection, on or about February 11, 1978, I received the check of Friends of Don Lyon dated February 7, 1978, drawn to the order of NCPAC and in the amount of \$1,500.00, representing a partial repayment of the loan described in paragraph 4. A copy of that check is attached hereto as Exhibit A.

8. That, in any event, the check described in paragraph 7 was in my custody and under my control prior to February 13, 1978.

9. That, on February 13, 1978, NCPAC paid the sum of \$944.50 to Promotional Creations, Inc., such sum being an in-kind contribution to Friends of Don Lyon.

10. That the check described in paragraph 7 was deposited in the NCPAC depository account on February 21, 1978.

IN WITNESS WHEREOF, you deponent has executed this affidavit on the 27 day of September, 1978.

Becki A. Cecil
Becki A. Cecil

Sworn to before me this
27th day of September, 1978.

[Signature]
Notary Public

My commission expires 8/8/80

79040115011

FRIENDS OF DO. LYON
 P. O. BOX 2507
 LOVES PARK, ILL. 61111

315
 70-2251
 719
 AIR 2/7 1978
 \$1500 -
 DOLLARS

UNITED BANK of Loves Park
 North Second and
 Riverside Avenues
 Loves Park, IL 61111

0000050000

PAY TO ORDER OF
 NATIONAL CONCERNATIVE
 POLITICAL ACTION COMMITTEE

MEMO
 0000050000

11051101067

FOR DEPOSIT ONLY
 National Concernative
 Political Action Committee
 Account No. 0-00-99-260

071000
 FRB CHICAGO
 FEB 22 1978
 FB '78' 23
 PAY ANY BANK
 THE RIGGS NAT'L BANK
 WASHINGTON, D.C.

635
 69176

EXHIBIT A



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire
Sedam and Herge
7600 Old Springhouse Road
McLean, Virginia 22101

Re: MUR 691(78)

Dear Mr. Herge:

On October , 1978, the Commission determined that there was reasonable cause to believe that the National Conservative Political Action Committee violated 2 U.S.C. 441a(a)(2)(A) by exceeding the \$5000 limitation imposed therein on contributions to a candidate or committee by a multicandidate political committee.

However, based on your voluntary efforts to expeditiously correct the violation, the Commission has also determined to take no further action and is closing its file in this matter.

If you have any questions, please feel free to contact Gary D. Lipkin, the attorney assigned to this matter at 523-4529.

Thank you for your cooperation.

Sincerely yours,

William C. Oldaker
General Counsel

79040115011

William C. Oldaker, Esq.
Page Two
September 27, 1978

4. Subsequently, in compiling the material necessary to prepare NCPAC's report of receipts and expenditures for the month of January, 1978, it was discovered that a portion (\$50.00) of the salary paid by NCPAC to Carolyn Ferrell in January had to be properly allocated to Friends of Don Lyon as an in-kind contribution. As a result, the aggregate in-kind contribution made by NCPAC to Friends of Don Lyon totaled \$5,050.00.

5. The Treasurer of NCPAC promptly called this error to the attention of the Chairman of NCPAC, John T. Dolan. Mr. Dolan then made arrangements with a representative of Friends of Don Lyon to have a portion of the \$5,000.00 loan repaid to NCPAC. Upon information and belief, those arrangements were made during the first week of February, 1978.

6. On February 7, 1978, Friends of Don Lyon drew a check in favor of NCPAC in the amount of \$1,500.00 in partial repayment of the \$5,000.00 loan. A copy of that check is attached to the affidavit of Miss Cecil as Exhibit A. [Upon information and belief, Friends of Don Lyon recorded in its report to the Commission that that check was disbursed to NCPAC on February 7, 1978.]

7. To the best of Miss Cecil's recollection, the \$1,500.00 check from Friends of Don Lyon was received by Miss Cecil on or about the 11th day of February, 1978 and, in any event, prior to February 13, 1978. As a result, the aggregate in-kind contribution made by NCPAC to Friends of Don Lyon had been reduced to \$3,550.00 by February 13, 1978.

8. On February 13, 1978, NCPAC paid the sum of \$944.50 to Promotional Creations, Inc. for the production of a television program for Friends of Don Lyon. That payment constituted an in-kind contribution to Friends of Don Lyon.

It is evident from the foregoing statement of facts that no additional action is justified or warranted in this matter. On January 26, 1978, NCPAC made an in-kind contribution to Friends of Don Lyon in the form of a \$5,000.00 loan. It was not until the close of the January, 1978 reporting period that NCPAC came to the realization that an incidental portion of an individual's salary also had to be allocated as an in-kind contribution to Friends of Don Lyon. Upon that realization, NCPAC immediately got in touch with representatives of Friends of Don Lyon and arranged for the prompt repayment of a portion of the \$5,000.00 loan. That

William C. Oldaker, Esq.
Page Four
September 27, 1978

We appreciate this opportunity to respond to your letter and look forward to being of further assistance to you should you require any additional information.

Sincerely yours,



J. Curtis Herge

Attachment

cc: Gary D. Lipkin, Esq.
Federal Election Commission

70040113011

STATE OF VIRGINIA)
COUNTY OF FAIRFAX) SS:

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1. That she is Treasurer of National Conservative Political Action Committee (hereinafter "NCPAC") and that she makes this statement of her own free will to assist the Federal Election Commission in its consideration of the matter which has been designated as MUR 691(78).

2. That NCPAC is a political committee as defined in the Federal Election Campaign Act of 1971, as amended, which has registered with the Federal Election Commission and which has qualified as a multi-candidate committee under the Act.

3. That NCPAC files its reports of receipts and expenditures with the Federal Election Commission on a monthly basis.

4. That, on January 26, 1978, NCPAC paid the sum of \$5,000.00 to the United States Postmaster, such sum being a loan to Friends of Don Lyon for use by that committee in meeting the postage expenses of a mass mailing program.

5. That, in the first week of February, 1978, when compiling the material necessary to prepare the NCPAC report of receipts and expenditures for the month of January, 1978, it came to my attention that the sum of \$50.00 had to be allocated as an in-kind contribution by NCPAC to Friends of Don Lyon, such sum being a portion of the salary paid by NCPAC to Carolyn Ferrell in January, 1978.

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6. That, upon realization of the facts set forth in paragraph 5, I called the matter to the attention of the Chairman of NCPAC, John T. Dolan, who, upon information and belief, made arrangements to have Friends of Don Lyon immediately repay a portion of the \$5,000.00 loan described in paragraph 4.

7. That, to the best of my recollection, on or about February 11, 1978, I received the check of Friends of Don Lyon dated February 7, 1978, drawn to the order of NCPAC and in the amount of \$1,500.00, representing a partial repayment of the loan described in paragraph 4. A copy of that check is attached hereto as Exhibit A.

8. That, in any event, the check described in paragraph 7 was in my custody and under my control prior to February 13, 1978.

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10. That the check described in paragraph 7 was deposited in the NCPAC depository account on February 21, 1978.

IN WITNESS WHEREOF, you deponent has executed this affidavit on the 21 day of September, 1978.

Becki A. Cecil
Becki A. Cecil

Sworn to before me this 27th day of September, 1978.
[Signature]
Notary Public
My commission expires 8/8/80

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FIRST CLASS



78 SEP 29 A 9: 59

REC'D
FEDERAL SYSTEM

<p>SEDAM & HERGE ATTORNEYS AT LAW 7600 OLD SPRINGHOUSE ROAD MCLEAN VIRGINIA 22101</p>	<p>To: William C. Olgaler, esq. General Counsel Federal Election Commission 1325 K Street, N.W. Washington, D. C. 20463</p>	<p>FIRST CLASS MAIL</p>
--	---	--------------------------------

APPEEVED
FEDERAL ELECTION
COMMISSION

SEDAM & HERGE

ATTORNEYS AT LAW
7800 OLD SPRINGHOUSE ROAD
MCLEAN, VIRGINIA 22101

78 SEP 29 A 9:59

(703) 821-1000

1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D. C. 20006
(202) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE

THOMAS M. DAVIS, III
MICHAEL D. HUGHES
ROBERT R. SPARKS, JR.
CHRISTOPHER M. WAB

September 27, 1978

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

Collection

Fidelity Re: MUR 691(78)

Dear Mr. Oldaker:

This letter is written in response to your letter to Miss Becki A. Cecil, Treasurer of National Conservative Political Action Committee, dated September 15, 1978, in which it was noted that the Federal Election Commission had found reason to believe that that Committee may have violated 2 U.S.C. 441a(a)(2)(A) by making a combination of loans and contributions to the Friends of Don Lyon Committee in excess of \$5,000.00. We have been engaged by the National Conservative Political Action Committee (hereinafter "NCPAC") to represent it in this matter, which you have designated MUR 691(78).

As set forth in the attached affidavit of Miss Cecil, the facts of this matter are, as follows:

1. NCPAC is a political committee as defined in the Federal Election Campaign Act of 1971, as amended (hereinafter the Act), which has registered with the Federal Election Commission and which has qualified as a multi-candidate committee under the Act.
2. NCPAC files its reports of receipts and expenditures monthly. 2 U.S.C. 434(a)(3).
3. On January 26, 1978, NCPAC paid the sum of \$5,000.00 to the United States Postmaster, that sum being intended to be applied toward the cost of postage expenses to be incurred by the Friends of Don Lyon in connection with a mass mailing program. This sum was a loan from NCPAC to Friends of Don Lyon and, as such, was an in-kind contribution, 2 U.S.C. 431(e) and 441a(a)(2)(A).

79040115053

4. Subsequently, in compiling the material necessary to prepare NCFAC's report of receipts and expenditures for the month of January, 1978, it was discovered that a portion (\$50.00) of the salary paid by NCFAC to Carolyn Ferrell in January had to be properly allocated to Friends of Don Lyon as an in-kind contribution. As a result, the aggregate in-kind contribution made by NCFAC to Friends of Don Lyon totaled \$5,050.00.

5. The Treasurer of NCFAC promptly called this error to the attention of the Chairman of NCFAC, John T. Dolan. Mr. Dolan then made arrangements with a representative of Friends of Don Lyon to have a portion of the \$5,000.00 loan repaid to NCFAC. Upon information and belief, those arrangements were made during the first week of February, 1978.

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8. On February 13, 1978, NCFAC paid the sum of \$944.50 to Promotional Creations, Inc. for the production of a television program for Friends of Don Lyon. That payment constituted an in-kind contribution to Friends of Don Lyon.

It is evident from the foregoing statement of facts that no additional action is justified or warranted in this matter. On January 26, 1978, NCFAC made an in-kind contribution to Friends of Don Lyon in the form of a \$5,000.00 loan. It was not until the close of the January, 1978 reporting period that NCFAC came to the realization that an incidental portion of an individual's salary also had to be allocated as an in-kind contribution to Friends of Don Lyon. Upon that realization, NCFAC immediately got in touch with representatives of Friends of Don Lyon and arranged for the prompt repayment of a portion of the \$5,000.00 loan. That

79040115054

William C. Oldaker, Esq.
Page Three
September 27, 1978

repayment, in the amount of \$1,500.00, was drawn on February 7, 1978 and received by NCPAC on or about February 11, 1978. Thus, it must be assumed that corrective action was properly taken within the framework and time period prescribed by the Commission in 11 CFR §103.3(b).

By reason of the reimbursement of \$1,500.00, the aggregate contribution made by NCPAC to Friends of Don Lyon prior to February 13, 1978 was \$3,550.00. The fact that that check was not deposited by the Treasurer of NCPAC until February 21, 1978 does not change this conclusion. Physical control of a check by the treasurer of a political committee establishes receipt of the proceeds. See AD 1975-22, 40 FR 45295, October 1, 1975. Furthermore, 11 CFR §103.3(a) requires that payments be deposited within ten days of the treasurer's receipt thereof. The \$1,500.00 check from Friends of Don Lyon to NCPAC was deposited within the requisite ten-day period of receipt.

As a consequence, when NCPAC made the \$944.50 payment to Promotional Creations, Inc. on February 13, 1978, which payment constituted an in-kind contribution to Friends of Don Lyon, it did so with the knowledge that its aggregate contribution to Friends of Don Lyon thereupon amounted to \$4,494.50.

In reviewing this matter, it is respectfully requested that the Federal Election Commission do so in light of the applicable and relevant policy considerations. When NCPAC discovered at the close of its January, 1978 reporting period that it had inadvertently made in-kind contributions to Friends of Don Lyon which totaled \$5,050.00, the mistake was corrected promptly and straightforwardly in accordance with the advice given by the Commission to candidates and political committees in its various publications. The mistake was fully and openly reported and corrective action was taken within the framework prescribed in 11 CFR §103.3(b). The fact that the mistake was innocent and inadvertent can be appreciated when one considers that part of the contribution was made by drawing a check (the direct act of the Treasurer) and that the balance of the contribution was in the nature of services rendered by another (an act which did not come to the attention of the Treasurer until after the close of the reporting period). It is suggested, therefore, that the corrective actions taken by NCPAC under the circumstances are actions that should be encouraged by the Commission without penalty.

7 9 0 4 0 1 1 5 0 5 5

Willis C. Oldaker, Esq.
Page Four
September 27, 1978

We appreciate this opportunity to respond to your letter and look forward to being of further assistance to you should you require any additional information.

Sincerely yours,

(Sgd) J. Curtis Herge

J. Curtis Herge

79040115056

Attachment

cc: Gary D. Lipkin, Esq.
Federal Election Commission

STATE OF VIRGINIA }
COUNTY OF FAIRFAX } SS:

BECKI A. CECIL, being duly sworn, deposes and says:

1. That she is Treasurer of National Conservative Political Action Committee (hereinafter "NCPAC") and that she makes this statement of her own free will to assist the Federal Election Commission in its consideration of the matter which has been designated as MUR 691(78).

2. That NCPAC is a political committee as defined in the Federal Election Campaign Act of 1971, as amended, which has registered with the Federal Election Commission and which has qualified as a multi-candidate committee under the Act.

3. That NCPAC files its reports of receipts and expenditures with the Federal Election Commission on a monthly basis.

4. That, on January 26, 1978, NCPAC paid the sum of \$5,000.00 to the United States Postmaster, such sum being a loan to Friends of Don Lyon for use by that committee in meeting the postage expenses of a mass mailing program.

5. That, in the first week of February, 1978, when compiling the material necessary to prepare the NCPAC report of receipts and expenditures for the month of January, 1978, it came to my attention that the sum of \$50.00 had to be allocated as an in-kind contribution by NCPAC to Friends of Don Lyon, such sum being a portion of the salary paid by NCPAC to Carolyn Ferrall in January, 1978.

79040113057

79040115053

6. That, upon realization of the facts set forth in paragraph 5, I called the matter to the attention of the Chairman of NCPAC, John T. Dolan, who, upon information and belief, made arrangements to have Friends of Don Lyon immediately repay a portion of the \$5,000.00 loan described in paragraph 4.

7. That, to the best of my recollection, on or about February 11, 1978, I received the check of Friends of Don Lyon dated February 7, 1978, drawn to the order of NCPAC and in the amount of \$1,500.00, representing a partial repayment of the loan described in paragraph 4. A copy of that check is attached hereto as Exhibit A.

8. That, in any event, the check described in paragraph 7 was in my custody and under my control prior to February 13, 1978.

9. That, on February 13, 1978, NCPAC paid the sum of \$944.50 to Promotional Creations, Inc., such sum being an in-kind contribution to Friends of Don Lyon.

10. That the check described in paragraph 7 was deposited in the NCPAC depository account on February 21, 1978.

IN WITNESS WHEREOF, you deponent has executed this affidavit on the 27 day of September, 1978.

Becki A. Cecil
Becki A. Cecil

Sworn to before me this 27th day of September, 1978.

[Signature]
Notary Public
My commission expires 8/8/80

FRIENDS OF DOG LION
 P. O. BOX 2507
 LOVES PARK, ILL. 61111

315
 70-2251
 719
 APR 27 1978
 \$1500 -
 DOLLARS

PAY TO THE ORDER OF
 ACPPAC
 [Signature]

UNITED BANK of Loves Park
 North Second and
 Riverside Boulevard
 Loves Park, IL 61111

MEMO FOR DEPOSIT ONLY
 POLITICAL ACTION COMMITTEE

0000150000

FB 0710-00
 FRB CHICAGO
 APR 27 1978
 FB 78 23
 PAY ANY BANK
 THE RIGGS NAT'L BANK
 WASHINGTON, D.C.

FOR DEPOSIT ONLY
 National Conservative
 Political Action Committee
 Account No. 0-00-99-260

635
 635
 635

EXHIBIT A

7 9 0 4 0 1 1 5 0 6 0



FIRST CLASS

SEDAM & HERGE

ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
MCLEAN VIRGINIA 22101

To:

Gary D. Lipkin, Esquire
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

FIRST CLASS MAIL

SEP 29 9:59

600#
5025

SEDAM & HERGE
ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
MCLEAN, VIRGINIA 22101
(703) 881-1000

RECEIVED
FEDERAL ELECTION
COMMISSION

'78 SEP 26 AM 11:54
1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D. C. 20006
(202) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE

THOMAS M. DAVIS, III
MICHAEL D. HUGHES
ROBERT R. SPARKS, JR.
CHRISTOPHER M. WAS

September 25, 1978

806521

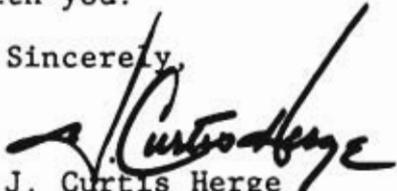
Gary D. Lipkin, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

Re: MUR 691(78)

Dear Mr. Lipkin:

This letter will serve to confirm the substance of our conversation over the telephone on Monday, September 25, 1978, at which time I advised you that this firm has been engaged as counsel to National Conservative Political Action Committee in connection with MUR 691(78).

As soon as we have an opportunity to review this matter, we will be in touch with you.

Sincerely,

J. Curtis Herge

cc: Miss Becki A. Cecil
Treasurer

7001011303

SEDAM & HERGE

ATTORNEYS AT LAW

3901 OLD SPRINGHOUSE ROAD

MGLEAN, VIRGINIA 22101

Gary D. Lipkin, Esq.
Office of the 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

September 15, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Becki A. Cecil, Treasurer
National Conservative Political
Action Committee
1500 Wilson Boulevard
Suite 513
Arlington, Virginia 22209

Re: MUR 691 (78)

Dear Mrs. Cecil:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your organization (NCPAC) may have violated 2 U.S.C. 441a(a)(2)(A) by making a combination of loans and contributions to the Friends of Don Lyons Committee in excess of \$5,000.

Specifically, it appears from your reports of receipts and expenditures on file with the Commission that between January 26, 1978 and February 21, 1978, NCPAC exceeded this limit by \$994.50. The transactions which led to this excess are set out in the copies of your report forms which are attached.

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

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after receipt of this notification.

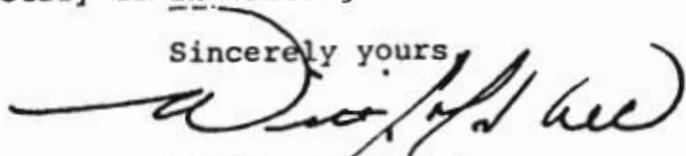
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This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation made public.

If you have any questions, please feel free to call Gary D. Lipkin, the attorney assigned to this matter, at 523-4529.

If you intend to be represented by counsel, please have such counsel so notify us in writing.

Sincerely yours,



William C. Oldaker
General Counsel

7201113051

Name of Candidate or Committee in full

National Conservative Political Action Committee

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of expenditure this period
Wiland & Associates	Computer Services In-Kind Contribution to VCPAC	1-10-78	67.45
Wiland & Associates	Computer services & In-Kind Contribution to Durette	1-10-78	69.00
Wiland & Associates	Computer Services In-kind Contribution to Statz for Va. Del.	1-10-78	50.00
U. S. Postmaster	Postage for Meter	1-12-78	500.00
Carolyn Ferrell 216 Maryland Ave. #101 Washington, D.C. 20002	Salary	1-13-78	416.00
Carolyn Ferrell	Salary - In-Kind Contribution to Don Lyon, IL.	1-13-78	50.00
Ralph Galliano 6109 Garfield St. Hollywood, Fla. 33024	Salary	1-13-78	368.00
Office World 1911 No. Ft. Myer Dr. Arlington, Va. 22209	Office Supplies	1-16-78	18.00
Subtotal of expenditures this page (optional)			\$
Total this period (last page, this line number only)			\$

Name of Candidate or Committee in full

National Conservative Political Action Committee

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of expenditure this period
National Defense Council 2121 P St. N.W. Suite 232 Washington, D.C. 20037	Loan	1-10-78	5,000.00
Metro Printing & Mailing 8446 Lee Highway Fairfax, Va. 22030	Advanced Postage Loan to Stump For Congress Arizona.	1-20-78	2,600.00
U. S. Postmaster	Advanced Postage to Don Lyon	1-26-78	5,000.00
Metro Printing & Mailing	Advanced Postage Loan to Stump for Congress Arizona.	1-27-78	500.00
Friends of George Roche Ford Rd. Outer Drive Dierborn Heights, MI	Loan	1-10-78	2,000.00

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Subtotal of expenditures this page (optional) > \$

Total this period (Post paid this line number only) > \$ 15,100.00

Name of Candidate or Committee in full		Amount of Original Debt, Contract, Agreement, or Promise	Cumulative Payment To Date	Outstanding Balance Close of this year
National Conservative Political Action Committee				
Full Name, mailing address and ZIP code, and nature of obligation U. S. Postmaster for Friends of Don Lyon 7702 North Main St. Rockford, IL 61103	Date (month, day, year) 1/26/78	\$ 5000.00 (postage loan)	\$ -0-	\$ 5000.00
Full Name, mailing address and ZIP code, and nature of obligation Metro Printing & Mailing for Bob Stump for Congress Committee	Date (month, day, year) 1/27/78	\$ 500.00 (postage loan)	\$ -0-	\$ 500.00
Full Name, mailing address and ZIP code, and nature of obligation Friends of George Roche Ford Rd. Outer Dr. Dierborn Heights, MI	Date (month, day, year) 1/10/78	\$ 2000.00	\$ -0-	\$ 2000.00
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Subtotal this period this page (optional)		\$	\$	\$
Total this period (last page this line number only)		\$ 32,600.00	\$ 5,500.00	\$ 27,100.00
Carry outstanding balance only, to appropriate line of summary.				

Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 23, and/or 24 of FEC Form 3

(see instructions on back)

LINE NUMBER 20

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

National Conservative Political Action Committee

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
C&P Telephone Co. of VA P.O. Box 27272 Richmond, VA. 23272	Telephone service	2/6/78	\$592.61
Washington Post Co. 1150 15th St., N.W. Washington, D.C. 20005	Classified advertising	2/6/78	\$85.62
U.S. Postmaster Rosslyn Station Arlington, VA. 22209	Fee to renew BRE permit	2/7/78	\$30.00
U.S. Postmaster	Business reply accounting fee	2/7/78	\$75.00
U.S. Postmaster	Postage for Meter	2/8/78	\$1,000.00
Promotional Creations, Inc. 3734 N. Pershing Dr. Arlington, VA 22203	Advertising Productions	2/13/78	\$1148.50
Promotional Creations, Inc.	Television spot Production-In-Kind contribution to Friends of Don Lyon	2/13/78	\$944.50
Prep Inc. 2611 Shirlington Rd. Arlington, Va. 22206	Printing services In-kind to NJ-CPAC	2/13/78	\$788.27

Subtotal of expenditures this page (optional)	\$
Total this period (last page this line number only)	\$

Name of Candidate or Committee in full		Amount of Original Debt, Contract, Agreement, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
National Conservative Political Action Comm.				
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Taxpayer's Action Fund 153 E. St. SE Washington, DC 20003	10/13/78	2000.00 (loan)	1500.00	500.00
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Florida Conservative Union 324 Datura St. #214 West Palm Beach, FL	12/8/76	3000.00 (loan)	3000.00	-0-
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Livingston for Congress 4650 General DeGaulle Dr. #210 New Orleans, LA 70114	8/8/77	5000.00 (loan)	2000.00	3000.00
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Garn for Senate Committee P.O. Box 11998 Salt Lake City, UT 84147	8/15/77	3500.00 (loan)	-0-	3500.00
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
U. S. Postmaster for Avi Nelson Campaign 89 State St. #220 Boston, MA 02109	12/19/77	2500.00 (postage loan)	-0-	2500.00
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
National Defense Council 2121 P St. NW #232 Washington, DC 20037	1/10/78	5000.00 (loan)	-0-	5000.00
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Metro Printing & Mailing for Bob Stump for Congress Comm. P.O. Box F Tolleson, AZ 85353	1/20/78	2600.00	-0-	2600.00
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
U. S. Postmaster for Friends of Don Lyon 1702 North Main St. Rockford, IL 61103	1/26/78	5000.00 (postage loan)	1500.00	3500.00
Subtotal this period this page (optional) ▶		\$	\$	\$
Total this period (last page this line number only) ▶		\$	\$	\$
Carry outstanding balance only, to appropriate line of summary				

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Name of Candidate or Committee in full		Date (month, day, year)	Amount of receipt this period
National Conservative Political Action Committee			
Full Name, mailing address and ZIP code Friends of Don Lyon 1702 North Main St. Rockford, IL 61103		2/21/78	\$1500.00
Principal place of business Same	Occupation Campaign Committee <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date > \$		
Full Name, mailing address and ZIP code Florida Conservative Union 324 Datura St. #314 West Palm Beach, Fl. 33401			
Principal place of business Same	Occupation Political Action Committee <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date > \$	2/22/78	\$2500.00
Full Name, mailing address and ZIP code Friends of George Roche Suite 100, 755 West Big Beaver Troy, MI 48084		2/5/78	\$2000.00
Principal place of business Same	Occupation Campaign Committee <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date > \$		
Full Name, mailing address and ZIP code			
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date > \$		
Full Name, mailing address and ZIP code			
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date > \$		
Full Name, mailing address and ZIP code			
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date > \$		
Subtotal of receipts this page (optional)			\$
Total this period (last page this line number only)			\$

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
of FEC FORM 3

(Use Separate Schedules for each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full

National Conservative Political Action Committee

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Friends of Don Lyon 1702 North Main St. Rockford, IL 61103	1-26-78	5,000.00	5,000.00	-0-
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):

Loan extinguished - \$3,500 balance converted to contribution.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Bob Stump for Congress Committee	1-27-78	500.00	-0-	500.00
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):

Postage Loan

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Friends of Dick Obenshain P.O. Box 13208 Richmond, VA 23225	2-2-78	3,000.00	-0-	3,000.00
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):

Loan

SUBTOTALS this period this page (optional)	\$	\$	\$
TOTAL this period (last page this line number only)	\$	\$	\$

Carry outstanding balance only to appropriate line of Summary

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
The National Conservative) MUR 691 (78)
Political Action Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on September 13, 1978, the Commission determined by a vote of 5-0 to adopt the following recommendations of the General Counsel, as set forth in the First General Counsel's Report dated September 8, 1978 regarding the above-captioned matter:

1. Find reason to believe that NCPAC violated 2 U.S.C. §441a(a)(2)(A).
2. Approve the letter attached to the above-named Report.

Voting for these determinations were Commissioners Harris, Springer, Staebler, Thomson, and Tiernan.

790401150 /
9/14/78

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: 9-8-78, 5:06
Circulated on 48 hour vote basis: 9-11-78, 4:00

September 8, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 691

Please have the attached First General Counsel's Report on MUR 691 distributed to the Commission on a 48 hour tally basis.

Thank you.

7904011507J

FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION SEP 8 1978

MUR NO. 691
STAFF MEMBER(S) Lipkin

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: National Conservative Political Action
Committee (NCPAC)

RELEVANT STATUTE: 2 U.S.C. §441a(a)(2)(A)

INTERNAL REPORTS CHECKED: Reports of NCPAC and recipient (Friends of
Don Lyons)

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

This matter was referred by the Reports Analysis Division to the Office of the General Counsel on August 17, 1978. The referral notes that reports for the period January 1, 1978 to February 2, 1978 show that NCPAC made a combination of loans and contributions to the Friends of Don Lyons Committee that exceeded the \$5,000 limitation established by 2 U.S.C. §441a(a)(2)(A). (See attached referral memo).

Specifically, on January 13, 1978, NCPAC made a \$50 salary payment to a campaign worker; on January 26, 1978, it advanced \$5,000 to the campaign as a loan for postage; and on February 13, 1978 it contributed \$944.50 to the campaign by paying this amount for the production of a television spot. The reports of NCPAC further show that on February 21, 1978, \$1,500 of the \$5,000 postage loan was paid back by the Lyons Committee and the \$3,500 balance was converted to a contribution and forgiven. (See attachments).

PRELIMINARY LEGAL ANALYSIS

NCPAC is a multicandidate political committee, which is defined by the Act as a political committee that receives contributions from more than 50 individuals and makes contributions to more than 5 candidates for federal office 2 U.S.C. §441a(a)(4); See also Reg. §100.14(a)(3). Section 441a(a)(2)(A) provides that such a committee may not make contributions to a candidate and his committee for any federal election which in the aggregate, exceeds \$5,000.

The total amount at issue herein is \$5,994.50 of which \$5,000 was a loan. While \$1,500 of the amount was paid back to NCPAC on February 21, 1978 (and the \$3,500 balance converted to a contribution), the Commission's regulations make a loan a contribution to the extent that it is outstanding (Reg. §100.4(a)(1)(i)). Consequently, for the period between January 26 and February 21, 1978, NCPAC was in violation of the \$5,000 contribution limit imposed by §441a(a)(2)(A).

RECOMMENDATION

Find reason to believe that NCPAC violated 2 U.S.C. §441a(a)(2)(A) and approve the attached letter.

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Attachments

1. Referral Memo
2. NCPAC reports (7 pages)
3. Certification
4. Letter to Respondent

REPORTS ANALYSIS REFERRAL SHEET

DATE August 17, 1978 ANALYST _____

TO: OFFICE OF GENERAL COUNSEL TEAM CHIEF Steve Mims *SH*

THROUGH: STAFF DIRECTOR ^{B.L. Cur} _{O.B.P.} COMPLIANCE REVIEW _____

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *EDH*

CANDIDATE/COMMITTEE: NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE

TREASURER: Becki A. Cecil

ADDRESS: 1500 Wilson Blvd.
Suite 513
Arlington, VA 22209

AFFILIATE(S):
 None pertinent to allegation

ALLEGATION(S):	CITE:	ATTACHMENT(S)
Excessive contributions and/or loans to the Friends of Don Lyons	441a (a) (2) (A)	2,3,4,5

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review, AND DATE: 3/22/78

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM January 1, 1978 TO February 28, 1978

TOTAL RECEIPTS \$ 192,684.58 TOTAL EXPENDITURES \$ 234,793.59

CASH ON HAND \$ 21,720.56 DEBTS \$ 110,417.25 (owed by) \$31,100 (owed to)

HISTORY:

RESULTS OF REVIEW: ATTACHMENT
Reports for the period 1/1/78 to 2/28/78 disclose excessive loans and/or contributions made to the Friends of Don Lyons. RAD initiated 6,7,8
Surface Violation letter which was sent on 4/20/78. Committee reported partial loan repayment on 2/21/78.

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT

None other than noted above

REASON(S) FOR REFERRAL: ATTACHMENT
Contributions/loans exceeded 441a (a) (2) (A) limitation for a period of 26 days before the partial loan repayment was received.

**Campaign Fundraising, Loans, and Transfers
 for Lines 20, 22, 23, and/or 24 of FEC Form 3**

(see instructions on back)

LINE NUMBER 20

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

National Conservative Political Action Committee

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Wiland & Associates	Computer Services In-Kind Contribution to VCPAC	1-10-78	67.45
Wiland & Associates	Computer services & In-Kind Contribution to Durette	1-10-78	69.00
Wiland & Associates	Computer Services In-kind Contribution to Statz for Va. Del.	1-10-78	50.00
U. S. Postmaster	Postage for Meter	1-12-78	500.00
Carolyn Ferrell 216 Maryland Ave. #101 Washington, D.C. 20002	Salary	1-13-78	416.04
Carolyn Ferrell	Salary - In-Kind Contribution to Don Lyon, Il.	1-13-78	50.00
Ralph Galliano 6109 Garfield St. Hollywood, Fla. 33024	Salary	1-13-78	368.95
Office World 1911 No. Ft. Myer Dr. Arlington, Va. 22209	Office Supplies	1-16-78	18.20

Subtotal of expenditures this page (optional) ▷ \$

Total this period (last page this line number only) ▷ \$

Political Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

LINE NUMBER 22

(Use separate schedule(s) for each numbered line)

(see instructions on back)

Name of Candidate or Committee in full

National Conservative Political Action Committee

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
National Defense Council 2121 P St. N.W. Suite 232 Washington, D.C. 20037	Loan	1-10-78	5,000.00
Metro Printing & Mailing 8446 Lee Highway Fairfax, Va. 22030	Advanced Postage Loan to Stump For Congress Arizona	1-20-78	2,600.00
U. S. Postmaster	Advanced Postage to Don Lyon	1-26-78	5,000.00
Metro Printing & Mailing	Advanced Postage Loan to Stump for Congress Arizona	1-27-78	500.00
Friends of George Roche Ford Rd. Outer Drive Dierborn Heights, MI	Loan	1-10-78	2,000.00

Subtotal of expenditures this page (optional) ▷ \$
Total this period (last page this line number only) ▷ \$ 15,100.00

Module C

1976
Federal Election Commission
11 K Street, N.W.
Washington, D.C. 20463

Debts and Obligations for
Line Number 26 and/or 27 of FEC Form 3

Page 2 of 2 for
LINE NUMBER 26
(Use separate schedule(s) for each numbered line)

(see instructions on back)

Name of Candidate or Committee in full		Amount of Original Debt, Contract, Agreement, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
National Conservative Political Action Committee				
Full Name, mailing address and ZIP code, and nature of obligation U. S. Postmaster for Friends of Don Lyon 1702 North Main St. Rockford, IL 61103	Date (month, day, year) 1/26/78	\$ 5000.00 (postage loan)	\$ -0-	\$ 5000.00
Full Name, mailing address and ZIP code, and nature of obligation Metro Printing & Mailing for Bob Stump for Congress Committee	Date (month, day, year) 1/27/78	\$ 500.00 (postage loan)	\$ -0-	\$ 500.00
Full Name, mailing address and ZIP code, and nature of obligation Friends of George Roche Ford Rd. Outer Dr. Dierborn Heights, MI	Date (month, day, year) 1/10/78	\$ 2000.00	\$ -0-	\$ 2000.00
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Subtotals this period this page (optional)		\$	\$	\$
Total this period (last page this line number only)		\$ 32,600.00	\$ 5,500.00	\$ 27,100.00
Carry outstanding balance only, to appropriate line of summary.				

Itemized Expenditures

**Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3**

Page 8 of 16 for

LINE NUMBER 20

(Use separate schedule(s) for each numbered line)

State Commission
Washington, D.C. 20463

(see instructions on back)

Name of Candidate or Committee in full

National Conservative Political Action Committee

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
C&P Telephone Co. of VA P.O. Box 27272 Richmond, VA. 23272	Telephone service	2/6/78	\$592.61
Washington Post Co. 1150 15th St., N.W. Washington, D.C. 20005	Classified advertising	2/6/78	\$85.62
U.S. Postmaster Rosslyn Station Arlington, VA. 22209	Fee to renew BRE permit	2/7/78	\$30.00
U.S. Postmaster	Business reply accounting fee	2/7/78	\$75.00
U.S. Postmaster	Postage for Meter	2/8/78	\$1,000.00
Promotional Creations, Inc. 3734 N. Pershing Dr. Arlington, VA 22203	Advertising Productions	2/13/78	\$1148.50
Promotional Creations, Inc.	Television spot Production-In-Kind contribution to Friends of Don Lyon	2/13/78	\$944.50
Prep Inc. 2611 Shirlington Rd. Arlington, Va. 22206	Printing services In-kind to NJ-CPAC	2/13/78	\$788.27

Subtotal of expenditures this page (optional) \$

Total this period (last page in this line number only) \$

Debts and Obligations for

Line Numbers 26 and/or 27 of FEC Form 3

LINE NUMBER 26

(Use separate schedule(s) for each numbered line)

Joe C
Election Commission
Street, N.W.
Washington, D.C. 20463

(see instructions on back)

Name of Candidate or Committee in full		Amount of Original Debt, Contract, Agreement, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
National Conservative Political Action Comm.				
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Taxpayer's Action Fund 153 E. St. SE Washington, DC 20003	10/13/78	2000.00 (loan)	1500.00	500.00
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Florida Conservative Union 324 Datura St. #214 West Palm Beach, FL	12/8/76	3000.00 (loan)	3000.00	-0-
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Livingston for Congress 4650 General DeGaulle Dr. #210 New Orleans, LA 70114	8/8/77	5000.00 (loan)	2000.00	3000.00
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Garn for Senate Committee P.O. Box 11998 Salt Lake City, UT 84147	8/15/77	3500.00 (loan)	-0-	3500.00
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
U. S. Postmaster for Avi Nelson Campaign 89 State St. #220 Boston, MA 02109	12/19/77	2500.00 (postage loan)	-0-	2500.00
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
National Defense Council 2121 P St. NW #232 Washington, DC 20037	1/10/78	5000.00 (loan)	-0-	5000.00
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Metro Printing & Mailing for Bob Stump for Congress Comm. P.O. Box F Tolleson, AZ 85353	1/20/78	2600.00	-0-	2600.00
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
U. S. Postmaster for Friends of Don Lyon 1702 North Main St. Rockford, IL 61103	1/26/78	5000.00 (postage loan)	1500.00	3500.00
Subtotals this period this page (optional)		\$	\$	\$
Total this period (last page this line number only)		\$	\$	\$

Carry outstanding balance only, to appropriate line of summary.

**Itemized Receipts,
 Contributions, Ticket Purchases, Loans,
 Rebates, and Transfers for Line
 Numbers 15, 16, 17 and/or 18 of FEC Form 3**
 (see instructions on back)

Name of Candidate or Committee in full
National Conservative Political Action Committee

Full Name, mailing address and ZIP code Friends of Don Lyon 1702 North Main St. Rockford, IL 61103	Date (month, day, year) 2/21/78	Amount of each receipt this period \$1500.00
Principal place of business Same	Occupation Campaign Committee	
	<input type="checkbox"/> Check if Contributor is self-employed	
	Aggregate Year-to-date ▶ \$	

Full Name, mailing address and ZIP code Florida Conservative Union 324 Datura St. #314 West Palm Beach, FL 33401	Date (month, day, year) 2/22/78	Amount of each receipt this period \$2500.00
Principal place of business Same	Occupation Political Action Committee	
	<input type="checkbox"/> Check if Contributor is self-employed	
	Aggregate Year-to-date ▶ \$	

Full Name, mailing address and ZIP code Friends of George Roche Suite 100, 755 West Big Beaver Troy, MI 48084	Date (month, day, year) 2/5/78	Amount of each receipt this period \$2000.00
Principal place of business Same	Occupation Campaign Committee	
	<input type="checkbox"/> Check if Contributor is self-employed	
	Aggregate Year-to-date ▶ \$	

Full Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation	
	<input type="checkbox"/> Check if Contributor is self-employed	
	Aggregate Year-to-date ▶ \$	

Full Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation	
	<input type="checkbox"/> Check if Contributor is self-employed	
	Aggregate Year-to-date ▶ \$	

Full Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation	
	<input type="checkbox"/> Check if Contributor is self-employed	
	Aggregate Year-to-date ▶ \$	

Subtotal of receipts this page (optional) ▶	\$
Total this period (last page this line number only) ▶	\$ 6000.00

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
of FEC FORM 3

Page 3 of 5 for

Line Number 12

(Use Separate Schedules for
each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full

National Conservative Political Action Committee

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Friends of Don Lyon 1702 North Main St. Rockford, IL 61103	1-26-78	5,000.00	5,000.00	-0-
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
		\$	\$	\$

NATURE OF OBLIGATION (Details of Debt):

Loan extinguished - \$3,500 balance converted to contribution.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Bob Stump for Congress Committee	1-27-78	500.00	-0-	500.00
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
		\$	\$	\$

NATURE OF OBLIGATION (Details of Debt):

Postage Loan

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Friends of Dick Obenshain P.O. Box 13208 Richmond, VA 23225	2-2-78	3,000.00	-0-	3,000.00
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
		\$	\$	\$

NATURE OF OBLIGATION (Details of Debt):

Loan

SUBTOTALS this period this page (optional)	\$	\$	\$
TOTAL this period (last page this line number only)	\$	\$	\$

Carry outstanding balance only to appropriate line of summary.



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Becki A. Cecil, Treasurer
National Conservative Political
Action Committee
1500 Wilson Boulevard
Suite 513
Arlington, Virginia 22209

Re: MUR 691 (78)

Dear Mrs. Cecil:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your organization (NCPAC) may have violated 2 U.S.C. 441a(a)(2)(A) by making a combination of loans and contributions to the Friends of Don Lyons Committee in excess of \$5,000.

Specifically, it appears from your reports of receipts and expenditures on file with the Commission that between January 26, 1978 and February 21, 1978, NCPAC exceeded this limit by \$994.50. The transactions which led to this excess are set out in the copies of your report forms which are attached.

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

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after receipt of this notification.

7991015094

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation made public.

If you have any questions, please feel free to call Gary D. Lipkin, the attorney assigned to this matter, at 523-4529.

If you intend to be represented by counsel, please have such counsel so notify us in writing.

Sincerely yours,

William C. Oldaker
General Counsel

7901011303

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING,

REPORTS ANALYSIS REFERRAL SHEET

DATE August 17, 1978 ANALYST _____
TO: OFFICE OF GENERAL COUNSEL TEAM CHIEF Steve Mims *SH*
THROUGH: STAFF DIRECTOR ^{B.L. Cur} _{O.B.P.} COMPLIANCE REVIEW _____
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *JKH*

CANDIDATE/COMMITTEE: NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE

TREASURER: Becki A. Cecil

ADDRESS: 1500 Wilson Blvd.
Suite 513
Arlington, VA 22209

AFFILIATE(S):
None pertinent to allegation

ALLEGATION(S): Excessive contributions and/or loans to the Friends of Don Lyons
CITE: 441a (a) (2) (A)
ATTACHMENT(S): 2,3,4,5

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review, AND DATE: 3/22/78
ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM January 1, 1978 TO February 28, 1978

TOTAL RECEIPTS \$ 192,684.58 TOTAL EXPENDITURES \$ 234,793.59
CASH ON HAND \$ 21,720.56 DEBTS \$ 110,417.25 (owed by) \$31,100 (owed to)

HISTORY:

RESULTS OF REVIEW: Reports for the period 1/1/78 to 2/28/78 disclose excessive loans and/or contributions made to the Friends of Don Lyons. RAD initiated Surface Violation letter which was sent on 4/20/78. Committee reported partial loan repayment on 2/21/78. *ATTACHMENT 6,7,8*

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: None other than noted above. *ATTACHMENT*

REASON(S) FOR REFERRAL: Contributions/loans exceeded 441a(a) (2) (A) limitation for a period of 26 days before the partial loan repayment was received. *ATTACHMENT*

OTHER PENDING ACTIONS INITIATED BY RAD: None. *ATTACHMENT*

OTHER RELEVANT INFORMATION: Similar pattern of excessive contributions/loans to the Bell for Senate committee appear in subsequent reports. This division is preparing a Surface Violation letter for this matter (excessive by \$165.68 since 3/21/78).

PREVIOUS REFERRALS TO OGC/AUDIT:

Information forwarded to Investigation Division on 7/27/76, 11/11/76, and 3/2/77 regarding reporting discrepancies and expenditures. *RAD Form 1 August 1978*

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FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 16AUG78

PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE								
CONNECTED ORGANIZATION: NONE								
ID# C00024687								
	1977 STATEMENT OF ORGANIZATION- AMENDMENT					17JAN77	1	77FEC/045/4629
	MISCELLANEOUS TRANSACTION FROM F.E.C.					30JAN77	1	77FEC/050/2030
	STATEMENT OF ORGANIZATION- AMENDMENT					18MAY77	2	77FEC/053/3870
	STATEMENT OF ORGANIZATION- AMENDMENT					25MAY77	1	77FEC/053/5005
	1978 STATEMENT OF ORGANIZATION- AMENDMENT					9MAR78	2	78FEC/048/0871
	1977 FEBRUARY MONTHLY	34,356		61,336		1JAN77 -31JAN77	28	77FEC/048/3802
	REQUEST FOR ADDITIONAL INFORMATION					1JAN77 -31JAN77	2	77FEC/047/3518
	FEBRUARY MONTHLY - AMENDMENT					1JAN77 -31JAN77	4	77FEC/049/0603
	FEBRUARY MONTHLY - AMENDMENT					1JAN77 -31JAN77	1	77FEC/056/4805
	MARCH MONTHLY	140,112		129,992		1FEB77 -28FEB77	34	77FEC/049/4124
	REQUEST FOR ADDITIONAL INFORMATION					1FEB77 -28FEB77	2	77FEC/050/0210
	MARCH MONTHLY - AMENDMENT					1FEB77 -28FEB77	1	77FEC/049/5371
	MARCH MONTHLY - AMENDMENT					1FEB77 -28FEB77	3	77FEC/051/2808
	MARCH MONTHLY - AMENDMENT					1FEB77 -28FEB77	1	77FEC/056/4807
	MARCH MONTHLY - AMENDMENT					1FEB77 -28FEB77	1	77FEC/059/3641
	APRIL MONTHLY	307,789		220,583		1MAR77 -31MAR77	39	77FEC/051/2769
	APRIL MONTHLY - AMENDMENT	307,789		220,583		1MAR77 -31MAR77	10	77FEC/052/3676
	APRIL MONTHLY - AMENDMENT					1MAR77 -31MAR77	1	77FEC/056/4809
	APRIL MONTHLY - AMENDMENT					1MAR77 -31MAR77	2	77FEC/059/3645
	MAY MONTHLY	43,114		94,357		1APR77 -30APR77	31	77FEC/053/2494
	REQUEST FOR ADDITIONAL INFORMATION					1APR77 -30APR77	2	77FEC/053/5312
	MAY MONTHLY - AMENDMENT	43,144		94,446		1APR77 -30APR77	3	77FEC/054/1572
	MAY MONTHLY - AMENDMENT					1APR77 -30APR77	2	77FEC/054/1569
	MAY MONTHLY - AMENDMENT	43,144		94,446		1APR77 -30APR77	5	77FEC/056/4520
	MAY MONTHLY - AMENDMENT					1APR77 -30APR77	2	77FEC/056/4508
	MAY MONTHLY - AMENDMENT					1APR77 -30APR77	1	77FEC/056/4811
	MAY MONTHLY - AMENDMENT					1APR77 -30APR77	1	77FEC/059/3645
	JUNE MONTHLY	145,181		175,646		1MAY77 -31MAY77	53	77FEC/054/1580
	REQUEST FOR ADDITIONAL INFORMATION					1MAY77 -31MAY77	3	77FEC/056/4656
	JUNE MONTHLY - AMENDMENT					1MAY77 -31MAY77	2	77FEC/056/4511
	JUNE MONTHLY - AMENDMENT					1MAY77 -31MAY77	1	77FEC/056/4813
	JUNE MONTHLY - AMENDMENT					1MAY77 -31MAY77	1	77FEC/059/3642
	REQUEST FOR ADDITIONAL INFORMATION					1JUL77 -31JUL77	3	77FEC/057/4900
	JULY MONTHLY	174,809		162,214		1JUN77 -30JUN77	32	77FEC/056/0766
	REQUEST FOR ADDITIONAL INFORMATION					1JUN77 -30JUN77	2	77FEC/056/4639
	JULY MONTHLY - AMENDMENT					1JUN77 -30JUN77	5	77FEC/056/4514
	JULY MONTHLY - AMENDMENT	174,809		162,214		1JUN77 -30JUN77	31	77FEC/056/4476
	JULY MONTHLY - AMENDMENT					1JUN77 -30JUN77	1	77FEC/059/3643
	AUGUST MONTHLY	72,441		74,058		1JUL77 -31JUL77	31	77FEC/057/2328
	AUGUST MONTHLY - AMENDMENT					1JUL77 -31JUL77	1	77FEC/059/3644
	SEPTEMBER MONTHLY	94,984		119,191		1AUG77 -31AUG77	47	77FEC/058/0868
	SEPTEMBER MONTHLY - AMENDMENT					1AUG77 -31AUG77	37	77FEC/058/3050
	OCTOBER MONTHLY	79,996		54,341		1SEP77 -30SEP77	59	77FEC/058/3794
	NOVEMBER MONTHLY	57,920		57,146		1OCT77 -31OCT77	33	77FEC/051/4042
	DECEMBER MONTHLY	103,553		117,569		1NOV77 -30NOV77	31	77FEC/052/4342
	DECEMBER MONTHLY - AMENDMENT					1NOV77 -30NOV77	32	78FEC/057/0374
	RECEIVED FROM	330,800		181,600		1NOV77 -30NOV77	116	78FEC/056/0511

Revised

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FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 16AUG78
PAGE 2

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
1978	YEAR END REPORT			223,509		1DEC77 -31DEC77	5	78FEC/067/4427
	REQUEST FOR ADDITIONAL INFORMATION			89,565		1JAN78 -31JAN78	32	78FEC/067/2924
	REQUEST FOR ADDITIONAL INFORMATION					1JAN78 -31JAN78	4	78FEC/068/2520
	REQUEST FOR ADDITIONAL INFORMATION					1JAN78 -31JAN78	2	78FEC/075/0278
	FEBRUARY MONTHLY					1J-4DEC/075/4222		
	FEBRUARY MONTHLY - AMENDMENT					1JAN78 -31JAN78	44	78FEC/075/3223
	MARCH MONTHLY			103,118		1FEB78 -28FEB78	29	78FEC/069/0972
	REQUEST FOR ADDITIONAL INFO 2ND				113,299	1JAN78 -28FEB78	2	78FEC/072/3825
	MARCH MONTHLY - AMENDMENT					1FEB78 -28FEB78	9	78FEC/072/5186
	MARCH MONTHLY - AMENDMENT					1FEB78 -28FEB78	2	78FEC/073/0781
	APRIL MONTHLY			182,134		1MAR78 -31MAR78	45	78FEC/072/5018
	APRIL MONTHLY - AMENDMENT				180,297	1MAR78 -31MAR78	4	78FEC/073/5261
	APRIL MONTHLY - AMENDMENT					1MAR78 -31MAR78	19	78FEC/074/2626
	MAY MONTHLY			62,904		1APR78 -30APR78	44	78FEC/075/0092
	MAY MONTHLY			84,863		1MAY78 -31MAY78	41	78FEC/077/1203
JUNE MONTHLY			84,863		1MAY78 -31MAY78	14	78FEC/081/4090	
JULY MONTHLY			74,037		1JUN78 -30JUN78	42	78FEC/081/2512	
	TOTAL		2,075,535	0	2,106,764	0	1046	TOTAL PAGES

1978 Reports Reviewed

To Be Reviewed
have been reviewed
regarding this
matter

Schedule B

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see instructions on back)

Page 6 of 16 for

LINE NUMBER 20

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

National Conservative Political Action Committee

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Wiland & Associates	Computer Services In-Kind Contribution to VCPAC	1-10-78	67.45
Wiland & Associates	Computer services & In-Kind Contribution to Durette	1-10-78	69.00
Wiland & Associates	Computer Services In-kind Contribution to Statz for Va. Del.	1-10-78	50.00
U. S. Postmaster	Postage for Meter	1-12-78	500.00
Carolyn Ferrell 216 Maryland Ave. #101 Washington, D.C. 20002	Salary	1-13-78	416.04
Carolyn Ferrell	Salary - In-Kind Contribution to Don Lyon, Il.	1-13-78	50.00
Ralph Galliano 6109 Garfield St. Hollywood, Fla. 33024	Salary	1-13-78	368.95
Office World 1911 No. Ft. Myer Dr. Arlington, Va. 22209	Office Supplies	1-16-78	18.20
Subtotal of expenditures this page (optional)			S
Total this period (last page this line number only)			S

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Schedule B

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see instructions on back)

Page 1 of 1 for

LINE NUMBER 22

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

National Conservative Political Action Committee

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
National Defense Council 2121 P St. N.W. Suite 232 Washington, D.C. 20037	Loan	1-10-78	5,000.00
Metro Printing & Mailing 8446 Lee Highway Fairfax, Va. 22030	Advanced Postage Loan to Stump For Congress Arizona	1-20-78	2,600.00
U. S. Postmaster	Advanced Postage to Don Lyon	1-26-78	5,000.00
Metro Printing & Mailing	Advanced Postage Loan to Stump for Congress Arizona	1-27-78	500.00
Friends of George Roche Ford Rd. Outer Drive Dierborn Heights, MI	Loan	1-10-78	2,000.00

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Subtotal of expenditures this page (optional)	▷	\$
Total this period (last page this line number only)	▷	\$ 15,100.00

Schedule C

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Debts and Obligations for
Line Numbers 26 and/or 27 of FEC Form 3

Page 2 of 2 for

LINE NUMBER 26

(Use separate schedule(s) for each numbered line)

(see instructions on back)

Name of Candidate or Committee in full		Amount of Original Debt, Contract, Agreement, or Promise	Cumulative Payment To Date	Outstanding Balance Close of This Period
National Conservative Political Action Committee				
Full Name, mailing address and ZIP code, and nature of obligation U. S. Postmaster for Friends of Don Lyon 1702 North Main St. Rockford, IL 61103	Date (month, day, year) 1/26/78	\$ 5000.00 (postage loan)	\$ -0-	\$ 5000.00
Full Name, mailing address and ZIP code, and nature of obligation Metro Printing & Mailing for Bob Stump for Congress Committee	Date (month, day, year) 1/27/78	\$ 500.00 (postage loan)	\$ -0-	\$ 500.00
Full Name, mailing address and ZIP code, and nature of obligation Friends of George Roche Ford Rd. Outer Dr. Dierborn Heights, MI	Date (month, day, year) 1/10/78	\$ 2000.00	\$ -0-	\$ 2000.00
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Subtotals this period this page (optional) ▶		\$	\$	\$
Total this period (last page this line number only) ▶		\$ 32,600.00	\$ 5,500.00	\$ 27,100.00
Carry outstanding balance only, to appropriate line of summary.				

Itemized Expenditures

Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

Page 8 of 16 for

LINE NUMBER 20

(Use separate schedule(s) for each numbered line)

(see instructions on back)

Commission
Street, N.W.
Washington, D.C. 20463

Name of Candidate or Committee in full

National Conservative Political Action Committee

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
C&P Telephone Co. of VA P.O. Box 27272 Richmond, VA. 23272	Telephone service	2/6/78	\$592.61
Washington Post Co. 1150 15th St., N.W. Washington, D.C. 20005	Classified advertising	2/6/78	\$85.62
U.S. Postmaster Rosslyn Station Arlington, VA. 22209	Fee to renew BRE permit	2/7/78	\$30.00
U.S. Postmaster	Business reply accounting fee	2/7/78	\$75.00
U.S. Postmaster	Postage for Meter	2/8/78	\$1,000.00
Promotional Creations, Inc. 3734 N. Pershing Dr. Arlington, VA 22203	Advertising Productions	2/13/78	\$1148.50
Promotional Creations, Inc.	Television spot Production-In-Kind contribution to Friends of Don Lyon	2/13/78	\$944.50
Prep Inc. 2611 Shirlington Rd. Arlington, Va. 22206	Printing services In-kind to NJ-CPAC	2/13/78	\$788.27

Subtotal of expenditures this page (optional) ▶ \$

Total this period (last page this line number only) ▶ \$

Debts and Obligations for

Line Numbers 26 and/or 27 of FEC Form 3

Page 1 of 1 for

LINE NUMBER 26

(Use separate schedule(s) for each numbered line)

(see instructions on back)

Electoral Commission
K Street, N.W.
Washington, D.C. 20463

Name of Candidate or Committee in full		Amount of Original Debt, Contract, Agreement, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
National Conservative Political Action Comm.				
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Taxpayer's Action Fund 153 E. St. SE Washington, DC 20003	10/13/78	2000.00 (loan)	1500.00	500.00
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Florida Conservative Union 324 Datura St. #214 West Palm Beach, FL	12/8/76	3000.00 (loan)	3000.00	-0-
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Livingston for Congress 4650 General DeGaulle Dr. #210 New Orleans, LA 70114	8/8/77	5000.00 (loan)	2000.00	3000.00
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Garn for Senate Committee P.O. Box 11998 Salt Lake City, UT 84147	8/15/77	3500.00 (loan)	-0-	3500.00
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
U. S. Postmaster for Avi Nelson Campaign 89 State St. #220 Boston, MA 02109	12/19/77	2500.00 (postage loan)	-0-	2500.00
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
National Defense Council 2121 P St. NW #232 Washington, DC 20037	1/10/78	5000.00 (loan)	-0-	5000.00
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Metro Printing & Mailing for Bob Stump for Congress Comm. P.O. Box F Tolleson, AZ 85353	1/20/78	2600.00	-0-	2600.00
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
U. S. Postmaster for Friends of Don Lyon 1702 North Main St. Rockford, IL 61103	1/26/78	5000.00 (postage loan)	1500.00	3500.00
Subtotals this period this page (optional) ▶		\$	\$	\$
Total this period (last page this line number only) ▶		\$	\$	\$

Carry outstanding balance only, to appropriate line of summary.

Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(see instructions on back)

Name of Candidate or Committee in full
National Conservative Political Action Committee

Full Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period
Friends of Don Lyon 1702 North Main St. Rockford, IL 61103 Principal place of business: Same Occupation: Campaign Committee <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	2/21/78	\$1500.00
Florida Conservative Union 324 Datura St. #314 West Palm Beach, Fl. 33401 Principal place of business: Same Occupation: Political Action Committee <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	2/22/78	\$2500.00
Friends of George Roche Suite 100, 755 West Big Beaver Troy, MI 48084 Principal place of business: Same Occupation: Campaign Committee <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	2/5/78	\$2000.00
Full Name, mailing address and ZIP code Principal place of business Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	Date (month, day, year)	Amount of each receipt this period
Full Name, mailing address and ZIP code Principal place of business Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	Date (month, day, year)	Amount of each receipt this period
Full Name, mailing address and ZIP code Principal place of business Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	Date (month, day, year)	Amount of each receipt this period
Full Name, mailing address and ZIP code Principal place of business Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	Date (month, day, year)	Amount of each receipt this period
Subtotal of receipts this page (optional) ▶		\$
Total this period (last page this line number) ▶		\$ 6000.00



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR #

691

Date Filmed 4/25/79 Camera No. --- 2

Cameraman

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