



## FEDERAL ELECTION COMMISSION

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

October 30, 1975

Addendum to Compliance Action Report of  
October 29, 1975. .

Request for Guidance on CA-010-75 should read:

See attached report from OGC.

Recommendation/Motion: It is moved that the  
Commission accept the opinion of the OGC and that  
the case be closed. In addition, it is moved  
that the procedure from the attached report from  
OGC and AID be accepted.

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77040010639

FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

October 22, 1975

MEMORANDUM TO: Lan Potter  
Jack Murphy

THROUGH: Drew McKay

FROM: ~~Ø~~ Stephen Schachman

SUBJECT: Termination Report

CA 010-75

Allegation: Senator Cannon's Campaign Committee received campaign contributions from individuals in excess of \$1,000 but not in excess of \$2,000.

Report: Senator Cannon's Campaign Committee has received 12 individual contributions of \$2,000 each. The campaign committee has assumed that each contribution was intended as a \$1,000 contribution for the primary election and \$1,000 for the general election and therefore not in violation of 18 U.S.C. §608. Accordingly, the committee allocated \$1,000 of each contribution to a separate account maintained for the primary election and the remainder to another account for the general election.

Opinion: It is the opinion of the Office of General Counsel that the donation of \$2,000 to the campaign committee, the acceptance of the donation by the campaign committee and the allocation to both the primary and general election are permissible under the Act.

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Recommendation: It is recommended that the case be closed. It is further recommended that the Commission adopt general guidelines for the acceptance, reporting and segregation of contributions intended to be allocated between the primary and general election. The attached memorandum sets forth suggested guidelines for acceptance of contributions similar to those accepted by the Cannon committee.

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77040010641

Attachment

October 22, 1975

MEMORANDUM TO: The Commission

FROM: Peter Roman and Stephen Schachman

SUBJECT: Suggested procedures for and questions raised by campaigns accepting individual contributions of \$2,000.

Obviously, from the attached compliance action report and OC 1975-64, committees have or are already concerned about accepting donations from individuals that exceed \$1,000 but do not exceed \$2,000 and are intended to be allocated between the primary and general election.

We should be aware that in order to run an effective general election campaign it will be necessary in some cases for a candidate and/or his committee to have solicited and received funds prior to the completion of the nominating process. The central question is how does the Commission ensure that donations which are intended to be allocated between the primary and general campaigns are not used expressly for the primary campaign? In order to ensure proper allocation the Commission should require:

(1) Receipt of separate checks or contemporaneous separate writing indicating how the funds are to be allocated. (The preferable method from the viewpoint of enforcement is separate checks but this may be an unworkable requirement from a practical political standpoint.)

(2) Timely deposit into separate primary and general bank accounts.

(3) Receipt of funds or expenses in excess of \$1,000 for the general election trigger the requirement of the committee filing a general election report in addition to its primary election reports.

(4) Additional questions raised (these matters may be more properly discussed in open session).

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A. Transfer of excess funds from primary account to the general election account. This raises problems in determining whether or not excess primary election funds are the result of contributions from individuals who have already contributed \$1,000 to the general election or the combination of the excess funds and the contributions to the general election will be in excess of \$1,000 \$608 limits. (This is similar to the transfer problems we dealt with in the New Hampshire special election.)

B. At the close of a successful primary election the campaign committee is in a deficit position. (This would be a reverse New Hampshire position.)

C. A candidate after receiving funds for a general election is unsuccessful in his bid for his party's nomination--how do we treat the funds in the general election?

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77040010643

October 21, 1975

MEMORANDUM TO: Stephen Schachman  
FROM: Gloria Sulton *G.S.*  
RE: Who has authority to proceed under 437g  
for reports filed on March 10, 1975

77040010644  
The FECA of 1971, as amended, created a Federal Election Commission made up of six voting members and the Secretary of the Senate and Clerk of the House of Representatives as ex officio members without any vote. Under Section 315(d) of the Act, however, the former "supervisory officers" were to "continue to carry out their responsibilities under title I [Campaign Communications] and title III [Disclosure of Federal Campaign Funds] of the Federal Election Campaign Act of 1971 as such titles existed on the day before the date of enactment of this Act" until the six members of the Commission, and the general counsel were appointed and qualified. (2 U.S.C. §437c footnote.) The appointments and transfers of authority were completed on May 30, 1975 (See 40 F.R. 20857, May 13, 1975 and 40 F.R. 23832, June 2, 1975).

Since the above language specifically limited the "supervisory officers" responsibilities to those under titles I and III of the 1971 Act, we must examine those responsibilities and compare them to those of the Commission under the 1974 amendments.

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Since title I of the 1971 Act was substantially repealed, the grant of authority to the supervisory officer concerning this title does not affect the Commission; therefore, our concern is the responsibilities of the "supervisory officers" under title III of the 1971 Act. Title III of the 1971 Act contains the disclosure requirements which are substantially the same under the 1974 Amendments. The supervisory officers are charged with reporting apparent violations of the law to appropriate law enforcement authorities; conducting audits and field investigations with respect to reports filed under title III of the 1971 Act; and investigating complaints and referring same to the Attorney General after investigation for civil enforcement. These responsibilities totally exclude any action by the supervisory officers with reference to the provisions of Title 18 (title II of the 1971 Act). Ergo, I submit that the Commission at all times has jurisdiction to refer a criminal violation to Justice within the period of limitations.

Further, it may be argued that the Commission has the authority to investigate a person it has reason to believe has committed a violation under 2 U.S.C. §437g(a)(2) since

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no such comparable authority was given to the supervisory officers under the 1971 Act. They were required to refer all apparent violations of title III to the appropriate law enforcement authorities including those coming to its attention by way of complaint. On the other hand, the Commission has the power to civilly enforce or refer to Justice for action in similar cases. I would argue that to the extent that the supervisory officers did not refer specific cases to Justice, we have the authority to investigate those matters and institute civil enforcement, if necessary.

With specific reference to late filings or non-filings of the March 10, 1975 reports, these were cases which the Secretary of the Senate automatically referred to Justice. I do not know the procedures used by the Clerk of the House. If this were done, I think we are precluded from any further action. I presume we could get this information from the Justice Department.

Basically, my position is that we cannot act on matters in which the supervisory officers have already acted pursuant to their authority under the 1971 Act but we can act in areas where our authority is the same or it exceeds theirs and they have not acted; and where we have authority to refer Title 18 violations to Justice.

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# FEDERAL ELECTION COMMISSION

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

October 16, 1975

MEMORANDUM TO: Stephen Schachman

FROM: Neal Janey

SUBJECT: CA-010-75

77040010647

You have asked me to consider whether twelve individual contributions of \$2,000 each to the campaign committee of Senator Cannon constitute apparent violations of the 18 U.S.C. §608 ceiling on individual contributions. In this case, Senator Cannon's campaign committee assumed that each contribution was intended for both the primary and general elections. Accordingly, the committee allocated \$1,000 of each contribution to a separate account maintained for the primary election and the remainder to another account maintained for the general election. Under these circumstances, Senator Cannon's campaign committee contends that the contributions were lawful and, when allocated, were not in excess of the \$1,000 individual contribution limitation applicable to the primary and general elections.

I agree that a campaign committee can allocate a single contribution to both the primary and general elections so long as certain conditions are met.

The simplest way for a donor to show his intent in making a contribution in excess of \$1,000 is to indicate in writing that his contribution should be allocated to the primary and general elections. Absence of such a writing accordingly would raise the presumption that the donor made an unlawful contribution in connection with the most proximate election. Of course this presumption could be rebutted in cases where the recipient of the contribution returned it and requested the donor to advise whether the contribution was intended to be allocated to the primary and general elections.



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On the other hand, the recipient may wish to accommodate a donor who makes what appears to be an excessive contribution by allocating the contribution for him. Afterall, the election laws are complex and the average donor may not be aware that he is required to express in writing his intent in making a contribution. He may feel that he can make a \$2,000 contribution to cover both the primary and general elections. As a matter of good relations with a donor, the recipient probably would prefer to allocate an otherwise excessive contribution rather than to return it with a dissertation on the election laws and to have the donor forward it again with a letter of intent.

In order to assure that the intent of a donor is in fact being followed, the recipient, here the campaign committee, should advise the donor in writing of the allocation and why it was made. Thus, if the donor intended to make an excessive contribution in connection with a primary or general election he could simply request a refund of the excess and not run afoul of the law. A letter from the committee may read as follows:

Dear Contributor:

The Committee has received your contribution in the amount of \$ \_\_\_\_\_. Under the Federal election laws, an individual contributor cannot make a political contribution in excess of \$1,000 in connection with a primary and a general election or a contribution in excess of \$2,000 to cover both elections. Accordingly, the Committee has allocated \$ \_\_\_\_\_ of your contribution to the primary election, \$ \_\_\_\_\_ to the general election, and has enclosed a refund of \$ \_\_\_\_\_.

If you object to the allocation and refund made by the Committee, please write within \_\_\_\_\_ days after receipt of this letter and advise as to how you wish your contribution to be handled.

In addition to giving notice, the committee, of course, would be required to segregate accounts for the primary and general elections. Furthermore, the committee would have to maintain appropriate records showing the name and address of the donor, the amount of his contribution, and any allocation of or refunds made from his contribution. The committee simply could keep a copy of its notice to the donor to show the disposition of a contribution.

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The Commission certainly should encourage committees or candidates to accommodate donors and to assist them in complying with the law. When excessive contributions have been made these objectives can be accomplished by permitting committees to allocate such contributions so long as it gives notice and maintains segregated accounts. Although the committee may benefit to some extent by having on hand general election contributions well in advance of the general election, the incidental benefit would be offset by the administrative costs of allocating, giving notice, maintaining separate accounts, and recordkeeping.

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RECEIVED  
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COMMISSION  
September 20, 1975

CA-010-75

'75 OCT 6 AM 11:38

Gordon Andrew McKay  
Assistant Staff Director  
for Disclosure and Compliance  
Federal Election Commission  
1325 K Street, N. W.  
Washington, D. C. 20463

Dear Mr. McKay:

In response to your letter of September 12, I regret that because this communication came to our Committee's post office box, which was cancelled after our affair, it was not delivered until just a few days ago.

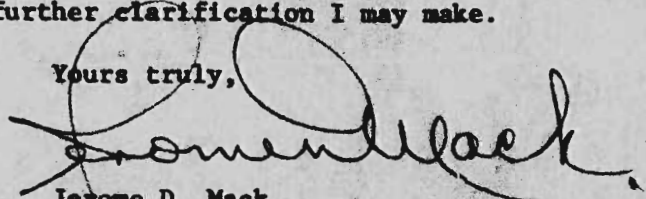
As to the contribution limitation of \$1,000 per individual, per election, I was under the impression, acting on advice by the Democratic Senatorial Campaign Committee, that an individual could contribute \$1,000 to each election. This was the procedure followed by the Committee and we have segregated our net receipts into two certificates of deposit in order that we might segregate primary and general election funds.

We have established an account consisting of \$104,000 in the Valley Bank of Nevada in Las Vegas, Nevada which represents our segregated general election account. The account is kept on a 30-day renewable certificate of deposit, while our other account consists of a \$100,000 certificate of deposit in the National Savings and Trust Company of Washington, D. C., plus a checking account in the same bank which as of October 1 has a balance of \$5,765.34.

I trust this information will clear up the subject matter of your September 12 letter and fully accomplish the requirements set forth under the provision of 18 U.S.C. 608.

Please contact me if there is any further clarification I may make.

Yours truly,



Jerome D. Mack  
Treasurer  
Howard Cannon Dinner Committee

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77040010650

FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

MEMORANDUM TO: DREW MCKAY  
THROUGH : PETER ROMAN *h*  
FROM: BOB COSTA *RPC*  
DATE: SEPTEMBER 30, 1975  
SUBJECT: CA-010-75 Telecon with Mr. Sobsey, Administrative Assistant to Senator Cannon

On September 29, 1975 I received a phone call from Mr. Sobsey requesting information concerning our letter of September 12, 1975 to Mr. Jerome D. Mack, Treasurer, Howard Cannon Dinner Committee (i.e. contributions apparently accepted from individuals in excess of \$1,000).

Mr. Sobsey stated that he had received the letter only a few days ago because it had been sent to a post office box in Las Vegas, Nevada (address of the Committee). Mr. Sobsey wanted to know if he could respond to our letter for Mr. Mack. I advised him that we would have no problem with this, provided he stated so in the letter.

Also, during our conversation, Mr. Sobsey informed me that the Committee had been acting on the advice of Mr. Bob Thompson (DSOC) when the contributions in question were accepted. He further stated that Mr. Thompson suggested that they set up two segregated accounts (primary and general election) and attribute \$1,000 to each account.

At this point I advised Mr. Sobsey to respond to our letter as soon as possible and include any and all information he feels will adequately explain this matter.

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77010651

September 18, 1975

MEMORANDUM TO: Drew McKay  
FROM: Stephen Schachman  
RE: CA 010-75.

I concur that more probably than not the contributions in excess of \$1,000 were to retire past campaign debts. I would, however, write to the individual committees involved and indicate to said committees that we are of the impression that the contributions were to retire past campaign debts and I would inform them of the requirements set forth in AO 6 and the guidelines. I do note that the Paul Laxalt for U.S. Senate Committee does not appear to have any deficit. Did it have said deficit prior to the reporting period March 1, 1975 to June 30, 1975?

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77040010652

FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

September 12, 1975

Certified Mail  
Return Receipt Requested

Mr. Jerome D. Mack, Treasurer  
Howard Cannon Dinner Committee  
Post Office Box 16066  
Las Vegas, Nevada 89101

Dear Mr. Mack:

A review of the July 10, 1975 Report of Receipts and Expenditures filed by your Committee with the Secretary of the U.S. Senate reveals contributions apparently accepted from individuals in excess of \$1,000. Supporting Schedule A for Part 1 of your report discloses the following twelve individual contributions in excess of \$1,000:

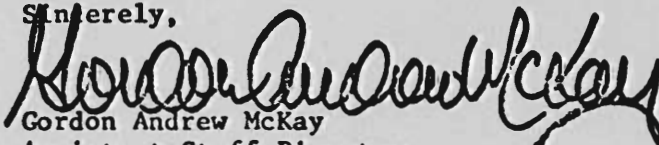
|         |                    |         |
|---------|--------------------|---------|
| 3/29/75 | Jack Curran        | \$2,000 |
| 6/05/75 | Jerome D. Mack     | \$2,000 |
| 6/05/75 | Joyce Mack         | \$2,000 |
| 6/05/75 | Andrew H. Tompkins | \$2,000 |
| 6/06/75 | Frank Rosenthal    | \$2,000 |
| 6/06/75 | Gene Fresch        | \$2,000 |
| 6/06/75 | Allen R. Glick     | \$2,000 |
| 6/06/75 | Herb Tobman        | \$2,000 |
| 6/09/75 | Pat Clark          | \$2,000 |
| 6/09/75 | Benny Binion       | \$2,000 |
| 6/09/75 | Jerry Herbst       | \$2,000 |
| 6/19/75 | R. S. Keyser       | \$2,000 |

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Aggregate contributions from an individual to any candidate with respect to any election for Federal office are limited to \$1,000 under the provisions of 18 U.S.C. 608.

The Commission invites your Committee to submit any information or amended reports which would clarify, explain or correct the disclosures described above. Such information or amended reports should be received by the Commission not later than ten business days after receipt of this letter. Please do not hesitate to write or call (202-382-3484) if you have any questions concerning this matter.

Sincerely,

  
Gordon Andrew McKay  
Assistant Staff Director  
for Disclosure and Compliance

77040010653

FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

August 22, 1975

COMMISSION MEMO #18

MEMORANDUM TO: COMMISSIONERS  
JACK MURPHY

THROUGH: LAN POTTER *J.P.*

FROM: DREW MCKAY *GAM*

SUBJECT: NOTIFICATION OF APPARENT VIOLATIONS -- DRAFT LETTER

Attached please find a draft letter to Mr. Jerome D. Mack. If this draft letter is not objected to by Noon, Tuesday, August 26, a similar letter would be sent to treasurers of political committees whose reports contain comparable apparent violations occurring during 1975, either referred to the Commission by the Clerk or Secretary, or discovered by Commission staff.

This letter is our first notification to the treasurer of an apparent violation; it is intended to prompt an explanation.

Attachment

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77010654

# FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

August 5, 1975

MEMORANDUM TO: DREW MCKAY  
THROUGH PETER ROMAN *R*  
FROM: BOB HAMM *REH*  
SUBJECT: REFERRAL BY THE SECRETARY OF THE U.S. SENATE  
ON JULY 15, 1975 (CA-010-75)

Attached please find a draft letter to Mr. Jerome D. Mack. If this letter is approved, a similar letter could be sent to all candidates and treasurers of political committees whose reports contain apparent violations of 18 U.S.C.608(b)(1), either referred to the Commission by the Clerk or Secretary, or discovered by Commission staff.

Each of these apparent violations occurred during 1975, and therefore do not relate to the jurisdictional question governing matters occurring prior to January 1, 1975. If the draft letter is approved, there are about 7 letters to be sent now with respect to the Secretary's referral of 18 U.S.C.608(b)(1) matters.

Furthermore, in the referral, the Secretary brought to our attention the following other matters which may require further action. These matters are outlined below:

| Committee                                                                                              | Nature of Matter Referred                            | Date                | Amount      |
|--------------------------------------------------------------------------------------------------------|------------------------------------------------------|---------------------|-------------|
| 1. Howard Cannon<br>Dinner Committee                                                                   | Refund of 2 corporate checks                         | 6/24/75-<br>6/28/75 | \$1000 each |
| Note: Our review of the committee's report showed the contributions were originally received on 5/5/75 |                                                      |                     |             |
| 2. Dale Bumpers<br>Campaign Committee                                                                  | Reimbursement of contribution (in excess of \$1,000) | 7/5/75              | \$215       |

Note: Our review showed that the Bumpers for Senate Committee apparently reported the receipt of the contribution on 6/5/74.

(Continued)

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| <u>Committee</u>              | <u>Nature of Matter Referred</u>                  | <u>Date</u> | <u>Amount</u> |
|-------------------------------|---------------------------------------------------|-------------|---------------|
| 3. Finch for Senate Committee | Return of contribution made by a foreign national | 3/31/75     | \$1,000       |

Note: Our review showed that the committee reported the receipt of the contribution on 12/4/74. At that time, it was stated the refund of the contribution would be shown in the next report filed by the committee.

|                                  |                           |                    |         |
|----------------------------------|---------------------------|--------------------|---------|
| 4. John Durkin                   | Business contributions    | 3/29/75            | 13      |
| Committee of the Friends of Reid | Business contributions    | 5/15/75            | 508     |
| Citizens for Senator John Tunney | 15 Business contributions | 6/2/75-<br>6/30/75 | \$9,150 |

Note: The Secretary's office apparently referred these matters as possible corporate contributions although the business establishment or organizations referred were not identified as corporate entities on the report.

|                               |                                    |         |     |
|-------------------------------|------------------------------------|---------|-----|
| 5. McGee for Senate Committee | contribution from union apparently | 3/13/75 | 200 |
|-------------------------------|------------------------------------|---------|-----|

Note: A FEC form letter already adopted to pursue this matter.

With respect to Item 4 above, the AID Staff suggests that the most expeditious manner of resolving this matter would be to contact the Secretaries of State who maintain records of incorporated organizations in their respective states.

Regarding Items 1-3 above, what position, if any, has the Commission taken on the acceptance and subsequent refund of contributions from corporations, union, and foreign nationals, as well as contributions in excess of statutory limitations.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

CA 10  
DRAFT

August 4, 1975  
p 1-2-6  
encl  
Keith

Mr. Jerome D. Mack, Treasurer  
Howard Cannon Dinner Committee  
Post Office Box 16066  
Las Vegas, Nevada 89101

Dear Mr. Mack:

77040010657  
A review of the July 10, 1975 Report of Receipts and Expenditures filed by your Committee with the Secretary of the U.S. Senate reveals contributions apparently accepted from individuals in excess of \$1,000. Supporting Schedule A for Part 1 of your report discloses the following twelve individual contributions in excess of \$1,000.00:

|         |                    |            |
|---------|--------------------|------------|
| 3-29-75 | Jack Curran        | \$2,000.00 |
| 6-5-75  | Jerome D. Mack     | 2,000.00   |
| 6-5-75  | Joyce Mack         | 2,000.00   |
| 6-5-75  | Andrew H. Tompkins | 2,000.00   |
| 6-6-75  | Frank Rosenthal    | 2,000.00   |
| 6-6-75  | Gene Fresch        | 2,000.00   |
| 6-6-75  | Allen R. Glick     | 2,000.00   |
| 6-6-75  | Herb Tobman        | 2,000.00   |
| 6-9-75  | Pat Clark          | 2,000.00   |
| 6-9-75  | Benny Binion       | 2,000.00   |
| 6-9-75  | Jerry Herbst       | 2,000.00   |
| 6-10-75 | R. S. Keyser       | 2,000.00   |

Aggregate contributions from an individual to any candidate with respect to any election for Federal office are limited to \$1,000 under the provisions of 18 U.S.C. 608.

QES02:050  
The Commission invites your Committee to submit any information or amended reports which would clarify, explain or correct the disclosure(s) detailed above. Such information or amended reports should be received by the Commission not later than ten business days after receipt of this letter. However, if you have any questions concerning this matter, please do not hesitate to write or call (202) 382-3484.

Sincerely,

Gordon Andrew McKay  
Assistant Staff Director for  
Disclosure and Compliance

United States Senate

OFFICE OF THE SECRETARY  
WASHINGTON, D.C. 20510

July 29, 1975

RECEIVED  
FEDERAL ELECTION  
COMMISSION

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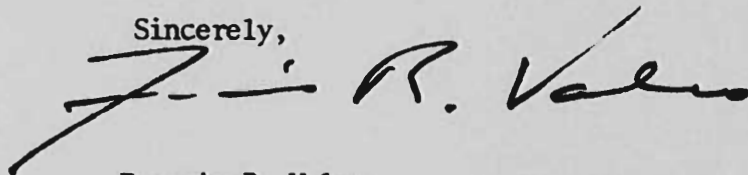
Honorable Thomas Curtis  
Chairman  
Federal Election Commission  
1325 K Street, N. W.  
Washington, D. C. 20463

Dear Mr. Chairman:

I am enclosing pertinent pages from the July 10th quarterly Reports of Receipts and Expenditures filed by candidates for the United States Senate, or political committees active on their behalf, which reveal possible violations of Title 18, Chapter 29 of the United States Code.

This transmittal is being made in line with your letter of June 16, 1975. Any subsequent possible violations of Title 18, Chapter 29 will be expeditiously brought to your attention.

Sincerely,



Francis R. Valeo  
Secretary of the Senate

Enclosure

FEDERAL ELECTION COMMISSION  
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OFFICE OF GENERAL COUNSEL

77040010658

July 18, 1975

MEMORANDUM TO: DREW MCKAY

FROM: BOB COSTA, BOB HAMM, AID

SUBJECT: ANALYSIS OF REFERRAL FROM THE SECRETARY OF THE SENATE  
ON 7/15/75.

This memo is in response to your request to analyze reports transmitted to us from the Secretary of the Senate. In his transmittal of July 15, 1975, the Secretary sent us reports in which his staff had noted several apparent violations. Those matters referred to us included several types of violations. Listed below are the results of our analysis.

| Reporting Candidate/<br>Committee              | Nature of Matter<br>Referred                           | Date and Amount<br>Reported  |
|------------------------------------------------|--------------------------------------------------------|------------------------------|
| Howard Cannon Dinner<br>Committee (NV)         | 12 Individual contributions<br>in excess of limitation | 3/19/75-<br>6/19/75 \$24,000 |
| Howard Cannon Dinner<br>Committee (NV)         | Refund on 2 Corporate<br>checks                        | 6/24/75-<br>5/75 2,000       |
| Paul Laxalt for U. S.<br>Senate Committee (NV) | 3 Individual contributions<br>in excess of limitation  | 3/19/75 7,500                |
| Committee of the Friends<br>for Reid (NV)      | 3 Individual contributions<br>in excess of limitation  | 4/16/75 7,500                |
| Stevens for Senate<br>Campaign Committee (NC)  | 2 Individual contributions<br>in excess of limitation  | 3/3/75 20,000                |
| Robert Morgan for U. S.<br>Senate (NC)         | 1 Individual contribution<br>in excess of limitation   | 6/1/75 1,500                 |
| C. R. Lewis for U. S.<br>Senate Committee (AK) | 1 Individual contribution<br>in excess of limitation   | 4/28/75 1,500                |

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CR 036

| Reporting Candidate/<br>Committee         | Nature of Matter<br>Referred                                                          | Date and Amount<br>Reported |          |
|-------------------------------------------|---------------------------------------------------------------------------------------|-----------------------------|----------|
| Durkin for U. S. Senate<br>Committee (NH) | 1 Individual contribution<br>in excess of limitation                                  | 3/6/75                      | \$18,000 |
| John Durkin (NH)                          | Business Contribution *                                                               | 3/29/75                     | 13       |
| Committee of the<br>Friends for Reid (NV) | Business Contribution *                                                               | 5/15/75                     | 508      |
| Citizens for Senator<br>John Tunney (CA)  | 15 Business Contributions *                                                           | 6/2/75-<br>6/30/75          | 9,150    |
| McGee for Senate<br>Committee (DC)        | Union Contribution                                                                    | 3/13/75                     | 200      |
| Dale Bumpers Campaign<br>Committee (AR)   | Reimbursement of contribution<br>in excess of voluntarily<br>imposed limit of \$1,000 | 3/24/75                     | 215      |
| Finch for Senate<br>Committee (CA)        | Return of contribution made<br>by a foreign national                                  | 3/31/75                     | 1,000    |

\* Apparently no determination made as to whether contributors are incorporated.

Note: In some instances in which individual contributions are reported in excess of the \$1,000 limitation, it appears that such contributions made in 1975 were applied against debts incurred during the 1974 election. Although the FEC has issued no opinion on the legality of such contributions, in discussions with FEC legal staffers we have been informed that such contributions may be considered as legally made.

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FEDERAL ELECTION COMMISSION JURISDICTION  
OVER 1974 VIOLATIONS

77040010661  
Due to the unusual circumstances in which this Commission was established, no precedential legal material can be found to substantiate the Federal Election Commission's (FEC) statutory authority to investigate and prosecute violations of the Federal Campaign Act which occurred prior to the Commission's creation. The Commission is unique in that its authority over pre-existing law has not been transferred from another administrative agency, and jurisdiction over pending complaints and investigations or past infractions may not be naturally implied. Therefore, any examination of the retroactive enforcement authority of other regulatory agencies with independent investigative power can lead only to incomplete analogies.

The Securities and Exchange Commission (SEC), for example, was established by the Securities Exchange Act of 1934, while the laws it enforced were enacted in the Securities Act of 1933. But jurisdiction over any violations of the Securities Act that had occurred during the year interim was transferred to the SEC from the Federal Trade Commission (FTC), which had

FEDERAL ELECTION COMMISSION  
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originally been given regulatory authority over the Act. It must be noted that the enabling legislation for the SEC contained no expressed language of retroactivity. Jurisdiction over pending complaints or investigations and previous violations was implied in the transfer of power from the FTC.

7 7 0 1 0 0 1 0 6 6 2  
In two other notable cases, the FTC has rendered enforcement authority, where enabling legislation was silent on the matter. The Consumer Product Safety Commission (CPSC) has been granted responsibility to enforce the Flammable Fabrics Act, and the Government Accounting Office (GAO) has assumed jurisdiction to investigate reports of independent regulating agencies under the Federal Reports Act. All pending cases and violations within the statute of limitations for prosecution, referred to and pursued by the FTC prior to these Acts, have been impliedly transferred to the jurisdiction of CPSC and GAO.

If the FEC has authority to investigate Title 18 violations which occurred prior to the effective date of P.L. 93-443, it is "at the expense" of no other administrative agency. As the Justice Department alone had jurisdiction over such violations under the Federal Election Campaign Act of 1971 (P.L. 92-225), the FEC would have to imply a similar transfer of power in order to assume jurisdiction. It is questionable whether the FEC may rely upon the precedents noted to justify

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this assumption. Perhaps the most cautious approach to solution of this dilemma, which would receive favorable notice from the federal courts, involves an arrangement with the Attorney General for singular treatment of cases falling within this narrow category.

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77040010663

**United States Senate**

OFFICE OF THE SECRETARY  
WASHINGTON, D.C. 20510

July 15, 1975

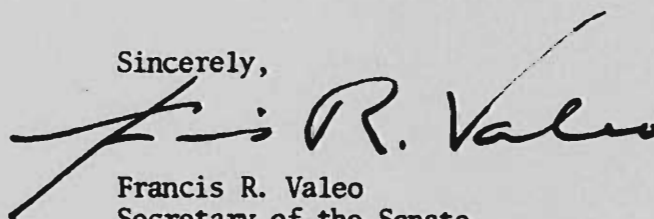
Honorable Thomas Curtis  
Chairman, Federal Election Commission  
1325 K Street, N. W.  
Washington, D. C. 20463

Dear Mr. Chairman:

I am enclosing pertinent pages from the July 10th quarterly Reports of Receipts and Expenditures filed by candidates for the United States Senate, or political committees active on their behalf, which reveal possible violations of Title 18, Chapter 29 of the U. S. Code.

This transmittal is being made in line with your letter of June 16, 1975, and Title II, Section 437 (g)(B) of the Federal Election Campaign Act Amendments of 1974. Any subsequent possible violations of Title 18, Chapter 29 will be expeditiously brought to your attention.

Sincerely,

  
Francis R. Valeo  
Secretary of the Senate

Enclosure

FEDERAL ELECTION COMMISSION  
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77040010664

RECEIVED  
OFFICE OF THE SECRETARY OF THE SENATE  
JAN 10 1975

H.D. 79175  
**UNITED STATES SENATE**

Office of the Secretary of the Senate

**RECEIPTS AND EXPENDITURES REPORT  
OF COMMITTEES**

**SUPPORTING CANDIDATE(S) FOR NOMINATION OR FOR ELECTION  
AS UNITED STATES SENATOR**

Name of Committee Nowak Cannon Dinner Committee  
Address Post Office Box 16666  
Las Vegas, Nevada 89101

Identification Number Assigned by Secretary  
**\$1996**

**NVDEM C565**

NOTE: If you have not yet registered,  
a complete Registration (Senate  
Election Form 1) must accom-  
pany this Report.

**REPORT IDENTITY**

(See Paragraph A under "General Information" on the back of this page.)

- (a) Periodic report due: March 10 \_\_\_\_\_ September 10 \_\_\_\_\_  
(Check one) July 10 ☒ January 31 \_\_\_\_\_
- (b) 1st Preelection report due 15 days before the (c) 2d Preelection report due 5 days before the  
(Check) (Date) (Check) (Date)
- |                               |                               |
|-------------------------------|-------------------------------|
| General Election on _____     | General Election on _____     |
| Special Election on _____     | Special Election on _____     |
| Primary Election on _____     | Primary Election on _____     |
| Runoff Election on _____      | Runoff Election on _____      |
| Caucus or Convention on _____ | Caucus or Convention on _____ |
- In the state(s) of: \_\_\_\_\_
- (d) This is also a: Suspension report \_\_\_\_\_ Termination report \_\_\_\_\_ Amended report \_\_\_\_\_  
(Check only when applicable)

**VERIFICATION BY OATH OR AFFIRMATION OF TREASURER**

State of Nevada  
County of Clark

I, James C. James, Treasurer of the Committee, do hereby depose (affirm) and say  
that this Receipts and Expenditures Report is complete, true, and correct.

Subscribed and sworn to (affirmed) before me this 14 day of January, A.D. 1975

OFFICIAL SEAL  
**BELLE C. JAMES**  
CLERK PUBLIC - STATE OF NEVADA  
COUNTY OF CLARK  
My Comm. Expires Feb. 3, 1978

My Commission Expires Feb. 3, 1978

[SEAL]

**RETURN COMPLETED REPORT AND ATTACHMENTS TO:**

Hon. Francis R. Valeo, Secretary of the Senate, U.S. Capitol, Washington, D.C. 20510

|                                                                  |  |                   |                   |
|------------------------------------------------------------------|--|-------------------|-------------------|
| Part 3. <b>Interest and dividends:</b>                           |  |                   |                   |
| a. Received (see schedule B and accompanying schedule A*)        |  | \$                | \$                |
| b. Unreceived                                                    |  | \$                | \$                |
| Total interest and dividends                                     |  | \$                | \$                |
| Part 4. <b>Other receipts (rents, salaries, interest, etc.):</b> |  |                   |                   |
| a. Received (see schedule A*)                                    |  | \$                | \$                |
| b. Unreceived                                                    |  | \$                | \$                |
| Total other receipts                                             |  | \$                | \$                |
| Part 5. <b>Transfers in:</b>                                     |  |                   |                   |
| a. Received (see schedule A*)                                    |  | \$                | \$                |
| b. Unreceived                                                    |  | \$                | \$                |
| Total transfers in                                               |  | \$                | \$                |
| <b>TOTAL RECEIPTS</b>                                            |  | <b>255,759.45</b> | <b>261,734.45</b> |

**SECTION B—EXPENDITURES:**

|                                                                                       |  |                  |                  |
|---------------------------------------------------------------------------------------|--|------------------|------------------|
| Part 6. <b>Communications media expenditures:</b>                                     |  |                  |                  |
| a. Received (see schedule C*)                                                         |  | \$               | \$               |
| b. Unreceived                                                                         |  | \$               | \$               |
| Total communications media expenditures                                               |  | \$               | \$               |
| Part 7. <b>Expenditures for personal services, salaries, and reimbursed expenses:</b> |  |                  |                  |
| a. Received (see schedule D*)                                                         |  | \$               | \$               |
| b. Unreceived                                                                         |  | \$               | \$               |
| Total expenditures for personal services, salaries, and reimbursed expenses           |  | \$               | \$               |
| Part 8. <b>Loans made:</b>                                                            |  |                  |                  |
| a. Received (see schedule D*)                                                         |  | \$               | \$               |
| b. Unreceived                                                                         |  | \$               | \$               |
| Total loans made                                                                      |  | \$               | \$               |
| Part 9. <b>Non-media and other expenditures:</b>                                      |  |                  |                  |
| a. Received (see schedule C*)                                                         |  | \$               | \$               |
| b. Unreceived                                                                         |  | \$               | \$               |
| Total non-media and other expenditures                                                |  | \$               | \$               |
| Part 10. <b>Transfers out:</b>                                                        |  |                  |                  |
| a. Received (see schedule D*)                                                         |  | \$               | \$               |
| b. Unreceived                                                                         |  | \$               | \$               |
| Total transfers out                                                                   |  | \$               | \$               |
| <b>TOTAL EXPENDITURES</b>                                                             |  | <b>40,162.30</b> | <b>40,162.30</b> |

**SECTION C—CASH BALANCES:**

|                                               |    |            |
|-----------------------------------------------|----|------------|
| Cash on hand at beginning of reporting period | \$ | 5,025.00   |
| Add total receipts (section A above)          | \$ | 255,759.45 |
| Subtotal                                      | \$ | 260,784.45 |
| Subtract total expenditures (section B above) | \$ | 40,162.30  |
| Cash on hand at close of reporting period     | \$ | 220,622.15 |

**SECTION D—DEBTS AND OBLIGATIONS:**

|                                                                               |    |   |
|-------------------------------------------------------------------------------|----|---|
| Part 11. <b>Debts and obligations owed to the committee (see schedule E*)</b> | \$ | 0 |
| Part 12. <b>Debts and obligations owed by the committee (see schedule E*)</b> | \$ | 0 |

**SENATE CAMPAIGN FINANCE COMMITTEE**  
(U.S. House of Representatives or Senate)

Page No. \_\_\_\_\_  
(Use for Matching Parts 1, 2, 3, 4, or 5)

**SEE REVERSE SIDE FOR INSTRUCTIONS**  
(Use separate page(s) for each Matching Part)

| DATE RECEIVED<br>(MM/DD/YY) | NAME, ADDRESS, AND ZIP CODE                                                | ORGANIZATION AND PURPOSE OF CONTRIBUTION, IF ANY (Do not include name of donor) | AMOUNT OF CONTRIBUTION  |
|-----------------------------|----------------------------------------------------------------------------|---------------------------------------------------------------------------------|-------------------------|
| 3/17/75                     | Baron A. Coleman<br>2225 Glen Summit Road<br>Colorado Springs, Colorado    |                                                                                 | This packet<br>\$ 25    |
| 3/17/75                     | J. B. Williams<br>1130 17th Street, N.W.<br>Washington, D.C. 20036         | Attorney<br>Williams & Jenson<br>Washington, D.C.                               | This packet<br>\$ 500   |
| 3/17/75                     | Max Lehrer<br>141 Hamblewood Road<br>Morristown, N.J. 08057                |                                                                                 | This packet<br>\$ 100   |
| 3/17/75                     | William V. Goodwin<br>102 Sussex Drive<br>Cinnaminson, N.J. 08077          |                                                                                 | This packet<br>\$ 50    |
| 3/17/75                     | Lee A. Dubes<br>P. O. Box 9031<br>University Station<br>Reno, Nevada 89507 |                                                                                 | This packet<br>\$ 20    |
| 3/17/75                     | Don W. Briggs<br>945 Joshua Drive<br>Reno, Nevada 89502                    |                                                                                 | This packet<br>\$ 10    |
| 3/17/75                     | Ira H. Lent<br>Route 2 Box 270<br>Fallon, Nevada 89406                     |                                                                                 | This packet<br>\$ 100   |
| 3/19/75                     | Evelyn Dubrow<br>140 D Street, S.E.<br>Washington, D.C. 20003              | Int'l. Garment Workers<br>Union<br>Washington, D.C.                             | This packet<br>\$ 200   |
| 3/19/75                     | Joseph M. Quinn<br>2641 Shuman Road<br>Los Angeles, CA 90027               | Regional Fed. Gov. Mgr.<br>A. B. Dick (Company)<br>Washington, D.C.             | This packet<br>\$ 200   |
| 3/19/75                     | Jack Curran<br>805 16th St., N.W.<br>Washington, D.C. 20006                | Director<br>Laborers' Political Action<br>Washington, D.C.                      | This packet<br>\$ 1,000 |
| 3/20/75                     | Bruce E. Tenell<br>245 Westmont<br>East Hartford, CT 06117                 |                                                                                 | This packet<br>\$ 100   |

**HOWARD GANNON BINDER COMMITTEE**  
(Full Name of Candidate or Committee)

Form No. \_\_\_\_\_  
(Use for Monthly Payments, P. O. A. 10-1)

**SEE REVERSE SIDE FOR INSTRUCTIONS**  
(Use separate page(s) for each numbered Part)

| Date Received<br>(MM, Year) | Full Name, Mailing Address, and ZIP Code                                | Occupational Statement, Place of Business, or "At Home" Address, and ZIP Code    | Amount                  |
|-----------------------------|-------------------------------------------------------------------------|----------------------------------------------------------------------------------|-------------------------|
| 6/4/75                      | Bernard Zeldin<br>5317 Las Vegas Blvd. South<br>Las Vegas, Nevada 89109 | <input type="checkbox"/>                                                         | This period<br>\$ 100   |
| 6/4/75                      | George Madlak<br>2244 Edgewood Drive<br>Las Vegas, Nevada 89101         | Attorney<br>302 E. Carson Avenue<br>Las Vegas, NV<br><input type="checkbox"/>    | This period<br>\$ 200   |
| 6/4/75                      | Marvin J. Gaut<br>6 Pheasant Lane<br>Lexington, Mass. 02173             | <input type="checkbox"/>                                                         | This period<br>\$ 100   |
| 6/4/75                      | Mr. & Mrs. Michael Signorelli<br>735 Oakmont<br>Las Vegas, Nevada 89107 | <input type="checkbox"/>                                                         | This period<br>\$ 25    |
| 6/4/75                      | Mr. & Mrs E. H. Hamdorf<br>533 7th Street<br>Boulder City, Nevada 89005 | <input type="checkbox"/>                                                         | This period<br>\$ 10    |
| 6/5/75                      | R. L. Kanel<br>2595 Market Street<br>Las Vegas, Nevada                  | R. L. Kanel Construction<br>Company<br>Las Vegas, NV<br><input type="checkbox"/> | This period<br>\$ 200   |
| 6/5/75                      | Eugene Warer<br>P. O. Box 1322<br>Las Vegas, Nevada 89101               | <input type="checkbox"/>                                                         | This period<br>\$ 100   |
| 6/5/75                      | Jerome D. Mack<br>2961 Augusta Drive<br>Las Vegas, Nevada               | Banker<br>Valley Bank of Nevada<br>Las Vegas, NV<br><input type="checkbox"/>     | This period<br>\$ 2,000 |
| 6/5/75                      | Joyce Mack<br>2961 Augusta Drive<br>Las Vegas, Nevada                   | Housewife<br>2961 Augusta Drive<br>Las Vegas, NV<br><input type="checkbox"/>     | This period<br>\$ 2,000 |
| 6/5/75                      | Mrs. Katherine Carroll<br>P. O. Box 414<br>Boulder City, Nevada 89005   | <input type="checkbox"/>                                                         | This period<br>\$ 100   |
| 6/5/75                      | Mr. E. O. Carroll<br>P. O. Box 414<br>Boulder City, Nevada 89005        | <input type="checkbox"/>                                                         | This period<br>\$ 100   |

# STATE OF NEVADA

THE NEVADA STATE TAX COMMISSION  
(Department of Revenue)

| DATE<br>6/5/75 | NAME, ADDRESS, CITY AND STATE                                        | TYPE OF BUSINESS                              | AMOUNT   |
|----------------|----------------------------------------------------------------------|-----------------------------------------------|----------|
| 6/5/75         | C. R. Conover<br>1000 Alta Drive<br>Las Vegas, Nevada 89107          | Real Estate<br>Las Vegas, Nevada              | \$ 200   |
| 6/5/75         | Mr. & Mrs. Stephen Glinski<br>107 Corvante<br>Las Vegas, Nevada      | Auto Dealer<br>Las Vegas, NV                  | \$ 200   |
| 6/5/75         | Robert Wright<br>700 Las Vegas Blvd., S.<br>Las Vegas, Nevada 89104  |                                               | \$ 200   |
| 6/5/75         | Andrew H. Tompkins<br>Box 1040<br>Las Vegas, Nevada 89101            | Casino<br>Lady Luck Casino<br>Las Vegas, NV   | \$ 2,000 |
| 6/5/75         | Ed Fountain<br>547 Griffith<br>Las Vegas, Nevada 89104               | Fountain Toyota<br>Las Vegas, Nevada          | \$ 200   |
| 6/5/75         | William F. Radd<br>910 Maplewood Drive<br>Reno, Nevada 89502         |                                               | \$ 50    |
| 6/5/75         | Ruth A. Stringer<br>1115 Arrowhead<br>Las Vegas, Nevada 89104        |                                               | \$ 200   |
| 6/5/75         | Malcolm S. Fuchs<br>1415 South 9th Street<br>Las Vegas, Nevada 89104 | Saleman<br>Cadillac<br>Las Vegas, NV          | \$ 200   |
| 6/5/75         | Walt Featherston<br>2010 West Carey<br>Las Vegas, Nevada             | Auto<br>West Glass Company<br>Las Vegas, NV   | \$ 200   |
| 6/5/75         | Aldon Stewart<br>1415 Vista Drive<br>Las Vegas, Nevada               | Stewart Brothers Company<br>Las Vegas, Nevada | \$ 200   |
| 6/5/75         | Mr. & Mrs. Stewart<br>1415 Vista Drive<br>Las Vegas, Nevada          | Stewart<br>1415 Vista Drive<br>Las Vegas, NV  | \$ 200   |

| Date   | Name, Address, City, State, Zip                                           | Position                                                     | Amount  |
|--------|---------------------------------------------------------------------------|--------------------------------------------------------------|---------|
| 6/6/75 | James P. Shaw<br>2104 Ottawa Drive<br>Las Vegas, Nevada 89109             | Nick I. Shaw<br>2104 Ottawa Drive<br>Las Vegas, NV           |         |
| 6/6/75 | Charles H. Harnett<br>600 Sunset Drive<br>Las Vegas, Nevada 89109         |                                                              |         |
| 6/6/75 | James E. Harnett<br>724 Palmetto Drive<br>Las Vegas, Nevada 89120         | General Manager<br>Starburst Hotel<br>Las Vegas, NV          |         |
| 6/6/75 | James & Charlotte Hill<br>27 Country Club Lane<br>Las Vegas, Nevada 89109 | President<br>Pebble Hotel<br>Las Vegas, NV                   | \$2,000 |
| 6/6/75 | Frank Rosenthal<br>972 Vegas Valley Drive<br>Las Vegas, Nevada 89109      | Executive Consultant<br>Argent Corporation<br>Las Vegas, NV  | \$2,000 |
| 6/6/75 | Gene Freese<br>3156 Montecito Drive<br>Las Vegas, Nevada 89120            | Vice President<br>Argent Corporation<br>Las Vegas, NV        | \$2,000 |
| 6/6/75 | Allen R. Glick<br>Starburst Hotel<br>Las Vegas, Nevada 89109              | Chairman of the Board<br>Argent Corporation<br>Las Vegas, NV | \$2,000 |
| 6/6/75 | Herb Tolman<br>2500 Stock-Lane<br>Las Vegas, Nevada                       | President<br>Starburst Hotel<br>Las Vegas, NV                | \$2,000 |
| 6/6/75 | Rodney W. Reed<br>6830 Fenbury Place<br>Pasadena, California              |                                                              |         |
| 6/6/75 | Barry Holman<br>972 Santa Anita<br>Las Vegas, Nevada 89108                |                                                              |         |
| 6/6/75 | Anthony P. Zacher<br>3000 Flamingo Circle<br>Las Vegas, Nevada            |                                                              |         |

**STATE OF NEVADA - DEPARTMENT OF REVENUE**  
**OFFICE OF THE COMMISSIONER OF REVENUE**

**THE NEVADA STATE LOTTERY AND AMUSEMENT BOARD**  
**(The Nevada Lottery) For each calendar year**

| DATE PAID | NAME AND ADDRESS OF PAYEE                                                        | AMOUNT PAID | REMARKS                                                     |
|-----------|----------------------------------------------------------------------------------|-------------|-------------------------------------------------------------|
| 6/9/75    | Charles Schol<br>11725 Kensington Place<br>Silver Spring, Maryland               | \$100       |                                                             |
| 6/9/75    | Frank S. Harriott<br>9 Cammeroy Road<br>Castle Cove, NSW Australia               | \$100       |                                                             |
| 6/9/75    | John & Mary Alice Stiv<br>1835 Sharon Way<br>Reno, Nevada 89402                  | \$100       |                                                             |
| 6/9/75    | L. B. Spear<br>3145 Las Vegas Boulevard<br>Las Vegas, Nevada 89109               | \$200       | General Manager<br>Robert Inn Country Club<br>Las Vegas, NV |
| 6/9/75    | Burlington Northern Empire<br>Voluntary Good Government<br>Saint Paul, Minnesota | \$100       |                                                             |
| 6/9/75    | Walter Kane<br>424 Nevada Hotel<br>Las Vegas, Nevada                             | \$100       |                                                             |
| 6/9/75    | Mr. E. Milligan<br>P. O. Box 309<br>Las Vegas, Nevada                            | \$100       |                                                             |
| 6/9/75    | Mrs. E. Milligan<br>P. O. Box 309<br>Las Vegas, Nevada                           | \$100       |                                                             |
| 6/9/75    | Perry W. Lieber<br>3427 Eastern Avenue<br>Las Vegas, Nevada 89109                | \$100       |                                                             |
| 6/9/75    | R. Julian Moon<br>1124 Vegas Valley Drive<br>Las Vegas, Nevada 89109             | \$1,000     | President<br>Frontier Fidelity Club<br>Las Vegas, NV        |
| 6/9/75    | Pat Clark<br>2075 E. Sahara Avenue<br>Las Vegas, Nevada 89105                    | \$100       | Nevada Development<br>2036 W. Sahara Ave.<br>Las Vegas, NV  |

# **EXHIBIT A** **FINANCIAL RECORDS—CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS**

**HOWARD CANNON DINNER COMMITTEE**  
 (Full Name of Candidate or Committee)

Part No. \_\_\_\_\_  
 (Use for Naming Part 1, 2, 3, 4, or 5)

**SEE REVERSE SIDE FOR INSTRUCTIONS**  
 (Use separate page(s) for each numbered Part)

| Date (month, day, year) | Full Name, Mailing Address, and ZIP Code                              | Occupation and Filled Place of Business, if any (If self-employed, also check box)     | Amount of Receipt This Period                           |
|-------------------------|-----------------------------------------------------------------------|----------------------------------------------------------------------------------------|---------------------------------------------------------|
|                         |                                                                       |                                                                                        | Aggregate Year-to-Date                                  |
| 6/9/75                  | Jean Z. Weinberger<br>79 Country Club Lane<br>Las Vegas, Nevada 89109 | Housewife<br>79 Country Club Lane<br>Las Vegas, NV <input type="checkbox"/>            | This period \$ 1,000<br>Aggregate Year-to-Date \$ 1,000 |
| 6/9/75                  | Jay E. Leshaw<br>275 Solano Prado<br>Coral Gables, Florida            | Caesar's World<br>880 N.E. 195th<br>Miami, FL <input type="checkbox"/>                 | This period \$ 1,000<br>Aggregate Year-to-Date \$ 1,000 |
| 6/9/75                  | Lewis Kaplan<br>P. O. Box 19218<br>Las Vegas, Nevada 89119            | <input type="checkbox"/>                                                               | This period \$ 100<br>Aggregate Year-to-Date \$ 100     |
| 6/9/75                  | Mark Smith<br>402 Greenbriar Townhouse<br>Las Vegas, Nevada           | <input type="checkbox"/>                                                               | This period \$ 100<br>Aggregate Year-to-Date \$ 100     |
| 6/9/75                  | Ed Tabor<br>2951 Pinehurst Drive<br>Las Vegas, Nevada                 | <input type="checkbox"/>                                                               | This period \$ 100<br>Aggregate Year-to-Date \$ 100     |
| 6/9/75                  | Stephan Wynn<br>2121 Silver Avenue<br>Las Vegas, Nevada 89102         | President<br>Golden Nugget<br>Las Vegas, NV <input type="checkbox"/>                   | This period \$ 1,000<br>Aggregate Year-to-Date \$ 1,000 |
| 6/9/75                  | Benny Binion<br>2040 West Bonanza<br>Las Vegas, Nevada 89106          | Owner<br>Binion's Horseshoe<br>Las Vegas, NV <input checked="" type="checkbox"/>       | This period \$ 2,000<br>Aggregate Year-to-Date \$ 2,000 |
| 6/9/75                  | Michael Gaughn<br>2994 Lindell<br>Las Vegas, Nevada                   | President<br>Royal Inn Hotel<br>Las Vegas, NV <input type="checkbox"/>                 | This period \$ 1,000<br>Aggregate Year-to-Date \$ 1,000 |
| 6/9/75                  | Ivan Carson<br>1000 Mohawk Drive<br>Las Vegas, Nevada                 | Owner<br>Carson Construction Co.<br>Las Vegas, NV <input checked="" type="checkbox"/>  | This period \$ 200<br>Aggregate Year-to-Date \$ 200     |
| 6/9/75                  | Carl L. Apple<br>1131 Homasels<br>Las Vegas, Nevada 89102             | Accountant<br>1209 South Commerce<br>Las Vegas, NV <input checked="" type="checkbox"/> | This period \$ 200<br>Aggregate Year-to-Date \$ 200     |
| 6/9/75                  | I. R. Ashleman<br>925 Desert Inn Road<br>Las Vegas, Nevada            | Attorney<br>Same address<br><input checked="" type="checkbox"/>                        | This period \$ 1,000<br>Aggregate Year-to-Date \$ 1,000 |

**TOTAL THIS PERIOD**  
 (Last page of this Part only)

# **SCHEDULE A**

## **ITEMIZED RECEIPTS—CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS**

**HOWARD CANNON DINNER COMMITTEE**  
(Full Name of Candidate or Committee)

Part No. \_\_\_\_\_  
(Use for itemizing Part 1, 2, 3, 4, or 5)

**SEE REVERSE SIDE FOR INSTRUCTIONS**

(Use separate page(s) for each numbered Part)

| Date (month, day, year) | Full Name, Mailing Address, and ZIP Code                        | Occupation and Principal Place of Business, if any (If self-employed, also check box)<br><div>Aggregate Year-to-Date \$</div> | Amount of Receipt This Period |
|-------------------------|-----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-------------------------------|
| 6/9/75                  | Mike Corrigan<br>3004 Lantern Lane<br>Las Vegas, Nevada 89107   | President<br>Wm. Stanwell Company<br>Las Vegas, NV<br><div>Aggregate Year-to-Date \$ 200</div>                                | This period \$ 200            |
| 6/9/75                  | Harley E. Harmon<br>P. O. Box 2748<br>Las Vegas, Nevada         | President<br>Harley Harmon Insurance Agency<br>Las Vegas, NV<br><div>Aggregate Year-to-Date \$ 200</div>                      | This period \$ 200            |
| 6/9/75                  | Walter Felgar<br>806 Campbell Avenue<br>Las Vegas, Nevada 89107 | <input type="checkbox"/><br><div>Aggregate Year-to-Date \$ 100</div>                                                          | This period \$ 100            |
| 6/9/75                  | Anna Felgar<br>806 Campbell Avenue<br>Las Vegas, Nevada         | <input type="checkbox"/><br><div>Aggregate Year-to-Date \$ 100</div>                                                          | This period \$ 100            |
| 6/9/75                  | Dick Rottman<br>13305 Mahogany Drive<br>Reno, Nevada            | <input type="checkbox"/><br><div>Aggregate Year-to-Date \$ 100</div>                                                          | This period \$ 100            |
| 6/9/75                  | Bill Smith<br>3005 W. Bryant<br>Las Vegas, Nevada               | <input type="checkbox"/><br><div>Aggregate Year-to-Date \$ 100</div>                                                          | This period \$ 100            |
| 6/9/75                  | Frank Kerestesi<br>2613 Mason<br>Las Vegas, Nevada              | <input checked="" type="checkbox"/><br><div>Aggregate Year-to-Date \$ 100</div>                                               | This period \$ 100            |
| 6/9/75                  | Ed Maybe<br>3111 Bel Air<br>Las Vegas, Nevada                   | <input type="checkbox"/><br><div>Aggregate Year-to-Date \$ 100</div>                                                          | This period \$ 100            |
| 6/9/75                  | Jerry Herbst<br>500 Shetland<br>Las Vegas, Nevada 89107         | Owner<br>Terrible Herbst Gas Station<br>Las Vegas, NV<br><div>Aggregate Year-to-Date \$ 2,000</div>                           | This period \$ 2,000          |
| 6/9/75                  | Ralph Denton<br>1260 Beaver Street<br>Boulder City, Nevada      | Attorney<br>880 East Sahara Avenue<br>Las Vegas, NV<br><div>Aggregate Year-to-Date \$ 200</div>                               | This period \$ 200            |
| 6/9/75                  | Robert Mahon<br>3523 Cackale Lane<br>Las Vegas, Nevada          | Owner - Marina<br>Leisure Industries<br>Las Vegas, NV<br><div>Aggregate Year-to-Date \$ 1,000</div>                           | This period \$ 1,000          |

**TOTAL THIS PERIOD**  
(Last page of this Part only)

# **SCHEDULE A**

## **REVENUE RECEIPTS—CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS**

**HOWARD CANNON DINNER COMMITTEE**

(Full Name of Candidate or Committee)

Part No. \_\_\_\_\_

(Use for Numbering Part 1, 2, 3, 4, or 5)

**SEE REVERSE SIDE FOR INSTRUCTIONS**

(Use separate page(s) for each numbered Part)

| Date (month, day, year) | Full Name, Mailing Address, and ZIP Code                                      | Occupation and Principal Place of Business, if any (If self-employed, also check box)<br><div>Aggregate Year-to-Date \$</div>    | Amount of Receipt This Period |
|-------------------------|-------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|-------------------------------|
| 6/19/75                 | Martin Ornitz<br>5025 Fifth Avenue<br>Pittsburgh, PA 15232                    | President<br>Crucible Steel Box 226<br>Midland, PA<br><input type="checkbox"/><br><div>Aggregate Year-to-Date \$ 200</div>       | This period \$ 200            |
| 6/19/75                 | T. G. Soper, Jr.<br>Route 1, Box 300<br>Elizabethtown, Kentucky 42701         | <input type="checkbox"/><br><div>Aggregate Year-to-Date \$ 100</div>                                                             | This period \$ 100            |
| 6/19/75                 | Fletcher Jones<br>444 South Decatur Blvd.<br>Las Vegas, Nevada                | Fletcher Jones Chevrolet<br>Las Vegas, Nevada<br><input checked="" type="checkbox"/><br><div>Aggregate Year-to-Date \$ 200</div> | This period \$ 200            |
| 6/19/75                 | Larry Fisher<br>6005 Grandada<br>Las Vegas, Nevada                            | All State Coin Machine<br>Las Vegas, Nevada<br><input checked="" type="checkbox"/><br><div>Aggregate Year-to-Date \$ 200</div>   | This period \$ 200            |
| 6/19/75                 | R. S. Keyser<br>56 Country Club Drive<br>Las Vegas, Nevada                    | DeLuca Importing Company<br>Box 14870<br>Las Vegas, NV<br><input type="checkbox"/><br><div>Aggregate Year-to-Date \$ 2,000</div> | This period \$ 2,000          |
| 6/24/75                 | Jack A. Meich<br>1845 Wesley Drive<br>Reno, Nevada 89503                      | <input type="checkbox"/><br><div>Aggregate Year-to-Date \$ 10</div>                                                              | This period \$ 10             |
| 6/24/75                 | John Alexander<br>4233 Sunybrae Drive<br>Bellevue, Washington                 | <input type="checkbox"/><br><div>Aggregate Year-to-Date \$ 25</div>                                                              | This period \$ 25             |
| 6/24/75                 | Peter Bush<br>1732 Lae Washington Blvd.<br>Seattle, WA 98122                  | <input type="checkbox"/><br><div>Aggregate Year-to-Date \$ 50</div>                                                              | This period \$ 50             |
| 6/24/75                 | James H. Anderson<br>18225 8th Street, S.W.<br>Seattle, Washington            | <input type="checkbox"/><br><div>Aggregate Year-to-Date \$ 50</div>                                                              | This period \$ 50             |
| 6/24/75                 | Raymond A. Cox<br>No-Si-Ka Bay<br>Route 1, Box 800/32<br>Evanston, Washington | <input type="checkbox"/><br><div>Aggregate Year-to-Date \$ 50</div>                                                              | This period \$ 50             |
| 6/24/75                 | John M. Barker<br>4441 139th S.E.<br>Bellevue, Washington                     | <input type="checkbox"/><br><div>Aggregate Year-to-Date \$ 25</div>                                                              | This period \$ 25             |

**TOTAL THIS PERIOD**  
(Last page of this Part only)

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## ITEMIZED EXPENDITURES—COMMUNICATIONS AND NON-MEDIA OR OTHER EXPENDITURES

HOWARD CANNON DINNER COMMITTEE

(Full Name of Candidate or Committee)

Part No. 1

(Use for Numbering Part 6 or 9)

SEE REVERSE SIDE FOR INSTRUCTIONS

(Use separate page (s) for each numbered Part)

| DATE<br>EXPENSE<br>MADE | PAYER<br>(Receipt of Payment)                                       |                                                                                                   | PURPOSE OF EXPENDITURE<br>(For communications media<br>expenditures, also specify<br>date(s) of use) | CHECK (✓)<br>EXPENDITURE<br>TYPE BY<br>ELECTION |  |  |  |  | AMOUNT<br>OF<br>EXPENDITURE<br>THIS<br>PERIOD | ALLOCATE EXPENDITURE<br>BY CANDIDATE<br>(To be completed only by Committee<br>supporting more than one candidate) |                         |
|-------------------------|---------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|-------------------------------------------------|--|--|--|--|-----------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-------------------------|
|                         | Full Name, Mailing Address,<br>and ZIP Code                         | Occupation and Principal<br>Place of Business,<br>if any<br>(If self-employed, also<br>check box) |                                                                                                      |                                                 |  |  |  |  |                                               | Full Name, Congressional<br>District (if applicable),<br>State and Party                                          | Amount<br>of<br>Expense |
| 5/18/75                 | The Postmaster<br>Washington, D.C.                                  | <input type="checkbox"/>                                                                          | Rental expense on<br>post office box                                                                 | x                                               |  |  |  |  | \$ 25.00                                      |                                                                                                                   |                         |
| 5/23/75                 | RAR Advertising<br>Ltd.<br>824 East Oakley<br>Las Vegas, NV         | <input type="checkbox"/>                                                                          | Printing of<br>dinner brochures                                                                      | x                                               |  |  |  |  | \$ 496.80                                     |                                                                                                                   |                         |
| 5/23/75                 | Creel Printing Co.<br>2650 S. Westwood<br>Las Vegas, NV 89109       | <input type="checkbox"/>                                                                          | Printing of<br>dinner brochures                                                                      | x                                               |  |  |  |  | \$1,400.00                                    |                                                                                                                   |                         |
| 5/28/75                 | Dot's Flower &<br>Gift Shop<br>808 Las Vegas Blvd.<br>Las Vegas, NV | <input type="checkbox"/>                                                                          | Flowers for dinner                                                                                   | x                                               |  |  |  |  | \$ 660.85                                     |                                                                                                                   |                         |
| 5/24/75                 | Donald Malcolm<br>1458 Airport Blvd.<br>San Jose, CA                | President of<br>Air Nevada<br>Same address<br><input type="checkbox"/>                            | Refund on corporate<br>check                                                                         | x                                               |  |  |  |  | \$ 1,000.00                                   | ✓                                                                                                                 |                         |
| 5/25/75                 | Robert Mahou<br>P.O. Box 11068<br>Las Vegas, NV                     | President<br>Leisure Industries<br>Inc.<br><input type="checkbox"/> Same address                  | Refund on corporate<br>check                                                                         | x                                               |  |  |  |  | \$ 1,000.00                                   | ✓                                                                                                                 |                         |
| 5/18/75                 | Nevada Bell<br>P. O. Box 10900<br>Reno, NV                          | Telephone company<br><input type="checkbox"/>                                                     | Telephone expenses                                                                                   | x                                               |  |  |  |  | \$ 7.91                                       |                                                                                                                   |                         |

TOTAL THIS PERIOD  
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