



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1044

Date Filmed 2/2/80 Camera No. --- 2

Cameraman bpc

60040180165



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 24, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Paul J. Manafort
Vorys, Sater, Seymour and Pease
1800 M Street, N.W.
Suite 800 South
Washington, D.C. 20036

Re: MUR 1044

Dear Mr. Manafort:

This is to confirm our receipt of your letter dated January 3, 1980 in connection with the Commission's investigation in the captioned matter. After considering the information you provided and other evidence available, the Commission determined, on January 18, 1980 to take no further action against your client, the Memphis Young Republican National Convention '77. Accordingly the Commission has closed its file on this matter.

Should you have any questions, please contact Marybeth Tarrant at 523-4175.

Sincerely,


Charles R. Wigglesworth
General Counsel

60040180166

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Paul J. Manafort
Terry, Sater, Seymour and Posen
1800 M Street, N.W.
Suite 900 South
Washington, D.C. 20036

Re: HR 1016

Dear Mr. Manafort:

This is to confirm our receipt of your letter dated January 3, 1980 in connection with the Commission's investigation in the captioned matter. After considering the information you provided and other evidence available, the Commission determined on , 1980 to take no further action against your client, the Memphis Young Republican National Convention '77. Accordingly the Commission has closed its file on this matter.

Should you have any questions, please contact Marybeth Tarrant at 523-4175.

Sincerely,

Charles W. Sizala
General Counsel

MT
1/21/80

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Memphis Young Republican)
National Convention '77)

MUR 1044

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on January 18, 1980, the Commission decided by a vote of 5-0 to take the following actions regarding the above-captioned matter:

1. Take no further action against the Convention Committee and close the file.
2. Send the letter attached to the General Counsel's January 14, 1980 report.

Voting for this determination were Commissions Aikens, Fridersdorf, Harris, McGarry, and Tiernan.

Attest:

1-18-80

Date

Margaret E. Chaney
for Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 1-15-80, 4:46
Circulated on 48 hour vote basis: 1-16-80, 11:00

00040180168

January 13, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Carr
SUBJECT: MUR 1044

Please have the attached General Counsel's Report
on MUR 1044 distributed to the Commission on a 48 hour
tally basis.

Thank you.

00040180169

BEFORE THE FEDERAL ELECTION COMMISSION
January 14, 1980

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

80 JAN 15 P4: 48

In the Matter of)
)
Memphis Young Republican)
National Convention '77)

MUR 1044

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter involves the possible violation of 2 U.S.C. §433 and §434 by the Memphis Young Republican National Convention '77 (the Convention Committee) due to \$4,976.11 in reimbursements that committee made to the Young Republican National Federation (YRNF), a registered political committee. As the purpose of the convention, the source of its funds and the reasons for discrepancies in the YRNF's reporting of the \$4,976.11 transfer were unclear, the Commission, on December 7, 1979, determined to send a letter with questions to Mr. Paul Manafort, attorney for the respondent. The letter went out on December 10, 1979.

II. EVIDENCE/ANALYSIS

On December 19, 1979, Mr. Manafort called this office and agreed to respond by January 4, 1980, which he did.

Mr. Manafort's explanation for the discrepancies surrounding the \$4,976.11 in reimbursements was that the first set of figures (Mr. Byrne's) was based on receipts which represented part of the payment received by the YRNF for expenditures it had incurred on behalf of the Convention Committee. The figures supplied by Mr. Manafort were based

00040180170

solely on YRNF staff expenses. He further claimed that the \$4,976.11 in question is the money he was referring to when he made the statement that "approximately" \$5,000 was transferred to the YRNF.

Additionally, Mr. Manafort stated that the Convention Committee, which is now dissolved, was established solely for the purpose of running the convention and that it did not conduct any business under the jurisdiction of the FECA. Also, he verified the fact that the source of its funds came solely from convention registration fees.

Thus, even though it is apparent that the YRNF encountered some reporting problems regarding the \$4,976.11, it appears that the Convention Committee did legitimately reimburse the YRNF for various expenditures it had incurred, and, therefore, it should not be considered a political committee, subject to reporting requirements. Accordingly, the file should be closed.

III. RECOMMENDATION

1. Take no further action against the Convention Committee and close the file.
2. Send the attached letter.

15 January 1980
Date


Charles N. Steele
General Counsel

ATTACHMENTS

1. Letter from Manafort dated January 3, 1980
2. Proposed letter

VORYS, SATER, SEYHOOR AND PEASE

1800 M STREET, N. W.
SUITE 800 SOUTH
WASHINGTON, D. C. 20036

TELEPHONE
202-296-2929
CABLE ADDRESS
VORYSATER

55 EAST GAY STREET
COLUMBUS, OHIO 43215
TELEPHONE
614-464-6400

January 3, 1980

Tarrant
Attachment 1

Mary Beth Tarrant
Federal Election Commission
1325 K Street, N.W.
Washington, D.C.

Re: MUR 1044

Dear Ms. Tarrant:

Pursuant to your request for information,
I have enclosed your questionnaire.

I trust that these responses answer your
inquiry.

Sincerely,

Paul J. Manafort
Paul J. Manafort

PJM/lvh
enclosure

cc: Richard Abell
James Byrnes

30 JAN 3 3:43

RECEIVED
JAN 3 1980
FEDERAL ELECTION COMMISSION

QUESTIONS

In view of the inconsistent explanations offered by the Young Republican National Federation (the Federation) for the reimbursement of \$4,976.00 from the Convention Committee (see attached letters), please answer the following questions.

See Attachment 1

1. Explain the discrepancy between the breakdown of the \$5,802.06 debt (later amended to \$4,976.11) given by James Byrnes and your subsequent itemization of the debt given April 27, 1979.

See Attachment 1

2. In a conversation with Doug Greevy of our Reports Analysis Division on October 11, 1977, you stated that \$5,000 had been transferred to the Federation by the Convention Committee. You further stated this was the contract price paid by the Convention Committee for the right to sponsor the convention and that the money consisted of registration fees paid by individuals attending the convention. A list of these individuals was to be provided (see your letter of October 11, 1977). Please explain why such a transfer was never reported and why this list of individuals was never provided.

See Attachment 1

3. Please state the purpose of the convention.

See Attachment 1

4. Please provide information regarding the Convention Committee's source of funds used to reimburse the Federation.

See Attachment 1.

5. Please provide copies of any bills, statements, memoranda, etc. in connection with the above questions.

See Attachment 2.

00040180173

ANSWERS TO QUESTIONS ---MUR 1044

- A. 1. Mr. Byrnes figures include receipts representing a part of the payment for expenditures made by the YRNF on behalf of the operation of convention activities.

Mr. Manafort's figures do not include receipted figures, only expenses incurred by the YRNF staff related to the convention.

- A. 2. The statement was that "approximately" \$5000 was transferred. This transfer was reported on Schedule A of the October 1977 FEC report in the amounts of \$330, \$1000, and \$3646.11.

- A. 3. The only purpose of the convention was to comply with the constitutional provisions of the YRNF which relate to the election of its officers at a biannual convention.

"Conventions of the Federation shall be held at least every two (2) years during the period of June 1 to July 15 in the odd numbered years, beginning June, 1943, at a place fixed by the Executive Committee, and each chartered group of Young Republicans shall be notified thereof at least sixty (60) days in advance of the date which shall be fixed by said Executive Committee."
(YRNF Constitution, Article XI, Section 1)

The Convention Committee, which had a limited existence and presently is dissolved, was established for only one purpose, to operate the convention. No business was conducted at the Convention, or by the Convention Committee, which is governed by the Federal Election Laws or regulations.

- A. 4. Convention registration fees which were based on expected costs of the convention.
- A. 5. YRNF Constitution, Article XI, Section 1 is attached.

00010180174

Section 4. The Young Republican National Committee shall have all the powers of the Federation in all matters except that it shall not have the power to change or vary any action or decision of a Convention of the Federation.

Section 5. Any action taken by the Young Republican National Committee may be appealed to the next Convention of the Federation, provided that written notice of such appeal shall have been mailed by a chartered state organization of Young Republicans by registered mail to the Secretary of the Federation at least thirty (30) days prior to such Convention. Upon receiving such notification, the Secretary of the Federation shall mail notice to the Secretary of each chartered state organization of Young Republicans of such appeal at least twenty (20) days prior to the Convention at which such appeal is to be considered.

Section 6. National Committeemen and National Committeewomen shall be chosen in the manner and for the term specified by their respective States, provided, however, the selection by the respective States shall be by election. Vacancies shall be filled between such elections as provided in the state Constitutions.

ARTICLE XI

CONVENTIONS

Section 1. Conventions of the Federation shall be held at least every two (2) years during the period of June 1 to July 15 in the odd numbered years, beginning June, 1943, at a place fixed by the Executive Committee, and each chartered group of Young Republicans shall be notified thereof at least sixty (60) days in advance of the date which shall be fixed by said Executive Committee.

Section 2. The chartered State organizations and District of Columbia of Young Republicans in good standing in each state shall be entitled to delegates equal in number to one for each 75,000, or major fraction thereof, votes cast for the Republican candidate for President at the last preceding election, plus four (4), and in addition, one delegate for each member of the Executive Committee who was a resident of the state at the time of his or her election or appointment; in the case of Puerto Rico, the votes cast for the Republican candidate for Resident Commissioner to Congress will be counted for apportionment of delegates.

The determination as to the number of delegates to which the States are entitled shall be based on those serving on the Executive Committee as of April 1 of the year of the Convention. The States shall be notified not later than sixty (60) days before the convening of the Convention as to the number of delegates to which they are entitled, and the determination shall not be altered due to any changes occurring after April 1. A college student shall be deemed to be a resident of the State in which his or her college shall be located.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Attachment 2

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Paul J. Manafort
Vorys, Sater, Seymour and Pease
1800 M Street, N.W.
Suite 800 South
Washington, D.C. 20036

Re: MUR 1044

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Should you have any questions, please contact Marybeth Tarrant at 523-4175.

Sincerely,

Charles N. Steele
General Counsel

00040180176

900-11992
VORYS, SATER, SEYMOUR AND PEASE

1800 M STREET, N. W.
SUITE 800-SOUTH
WASHINGTON, D. C. 20036

TELEPHONE
202-296-2929
CABLE ADDRESS
VORYSATER

52 EAST GAY STREET
COLUMBUS, OHIO 43215
TELEPHONE
614-464-6400

January 3, 1980

Mary Beth Tarrant
Federal Election Commission
1325 K Street, N.W.
Washington, D.C.

Re: MUR 1044

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I trust that these responses answer your
inquiry.

Sincerely,


Paul J. Manafort

PJM/lvh
enclosure

cc: Richard Abell
James Byrnes

30 JAN 3 3:43

RECEIVED
FEB 11 1980
U.S. DEPT. OF JUSTICE

QUESTIONS

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See Attachment 2.

00040180178

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LAW OFFICES OF
VORYS, SATER, SEYMOUR & PEASE
1800 M STREET, N.W.
SUITE 800-SOUTH
WASHINGTON, D. C. 20036

Mary Beth Tarrant
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
7th Floor
Washington, D.C.



REAGAN for PRESIDENT

FEDERAL ELECTION
COMMISSION

79 DEC 21 AM 8:58

1628 L Street, N.W.
Suite 801
Washington, D.C. 20006
202/861-5000

005431

December 19, 1979

Mary Beth Tarrant
Federal Election Commission
1325 K Street, NW
Washington, D.C.

Re: MUR 1044

Dear Ms. Tarrant:

This is to confirm our conversation of December 19, 1979 whereby we agreed upon an extension of the time within which to reply to your inquiry. As we discussed in that conversation, we will respond no later than January 4, 1980.

Thank you for your cooperation in this matter. I look forward to getting the questions resolved expeditiously.

Sincerely,

Paul J. Manafort
Paul J. Manafort

PJM/lvh

12:01 12030 67

GENERAL COUNSEL

0049180183

REAGAN for PRESIDENT

1828 L Street, N.W.

Suite 201

Washington, D.C. 20036



Mary Beth Tarrant
Federal Election Commission
1325 K Street, N.W.
Washington, D.C.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 10, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Paul Manafort
Vorys, Sater, Seymour
and Pease
Suite 800
1800 M Street, N.W.
Washington, D.C.

Re: MUR 1044

Dear Mr. Manafort:

As you are aware, the Federal Election Commission previously found reason to believe that your clients, the Memphis Young Republican National Convention '77, Inc. (the Convention Committee), may have violated sections 433 and 434 of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that the Convention Committee, in transferring \$4,976 to the Young Republican National Federation, may have qualified as a political committee and therefore would be required to register and report as such.

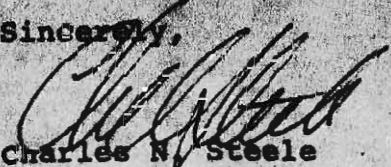
The matter has now been referred to the Office of General Counsel and is numbered MUR 1044. Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your client. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Additionally, please submit answers to the enclosed questions. Where appropriate, statements should be submitted under oath. In this connection, we have already considered your letters of October 11, 1977 and April 27, 1979 and your numerous phone calls to the Commission. We request your response to be submitted within two weeks after your receipt of this notification.

If you have any questions, please contact Marybeth Tarrant, the staff member now assigned to this matter, at 202-523-4175.

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

Sincerely,


Charles N. Steele
General Counsel

Enclosures

Questions
Letters

00040180185

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Paul Manafort
Vorys, Sater, Seymour
and Pene
Suite 500
1800 K Street, N.W.
Washington, D.C.

Re: MUR 1044

Dear Mr. Manafort:

As you are aware, the Federal Election Commission previously found reason to believe that your client, the Memphis Young Republican National Convention, Inc. (the Convention Committee), may have violated sections 433 and 434 of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that the Convention Committee, in transferring \$4,976 to the Young Republican National Education, may have qualified as a political committee and therefore would be required to register and report as such.

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

Sincerely,

Charles M. Steele
Acting General Counsel

Enclosure

12/1/79

MT
12/1/79

QUESTIONS

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1. Explain the discrepancy between the breakdown of the \$5,802.06 debt (later amended to \$4,976.11) given by James Byrnes and your subsequent itemization of the debt given April 27, 1979.
2. In a conversation with Doug Greevy of our Reports Analysis Division on October 11, 1977, you stated that \$5,000 had been transferred to the Federation by the Convention Committee. You further stated this was the contract price paid by the Convention Committee for the right to sponsor the convention and that the money consisted of registration fees paid by individuals attending the convention. A list of these individuals was to be provided (see your letter of October 11, 1977). Please explain why such a transfer was never reported and why this list of individuals was never provided.
3. Please state the purpose of the convention.
4. Please provide information regarding the Convention Committee's source of funds used to reimburse the Federation.
5. Please provide copies of any bills, statements, memoranda, etc. in connection with the above questions.

00040180189

Young Republican National Federation

RECEIVED
FEDERAL ELECTION
COMMISSION

77 AUG 22 AM 9:12

#5

August 19, 1977

Roger J. Stone, Jr.
Chairman, Virginia

Ann Quirk
Co-Chairman, Texas

Sherril Gordon
Secretary, Utah

Lou Barnett
Treasurer, California

Linda Wilson Reed
Assistant Secretary,
South Carolina

Ed Stanley
Auditor, Washington

Martha McCrery
National Vice Chairman-
At-Large, Illinois

Neal Acker
General Counsel, Alabama

James Byrnes
Executive Director,
Pennsylvania

Kay Ford
Assistant to the Chairman

310 First Street, S.E.
Washington, D.C. 20003
(202) 484-6680

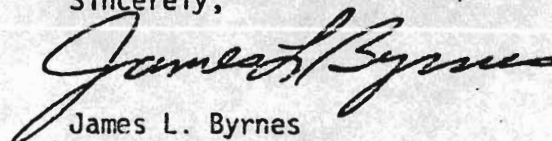
Federal Election Commission
1325 K Street NW
Washington, D. C. 20003

Dear Mr. Potter:

Enclosed is the information that you requested in
your letter of August 11, 1977.

If there is any additional information that you
need, please feel free to contact me.

Sincerely,


James L. Byrnes
Executive Director

JLB/kef

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

DG/3

Young Republican National Federation

DATE: Aug. 11, 1977

I.D. NO.: C00060046

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

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

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

☐ Coverage Dates ☐ omitted or ☐ incorrect

☐ Signature ☐ omitted or ☐ incorrect

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

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

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

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

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

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

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

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

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

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

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

☐ Inadequate Description of ☐ proceeds ☐ dates ☐ events ☐ location of Schedule ☐

☐ Other: Please See Page Two

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

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

Young Republican National Federation
July 10 Quarterly-Amendment Report-1977

The entries of debts and obligations owed to the Young Republican National Federation by Memphis Young Republican National Convention, Inc., itemized on Schedule C, Line 26, Page 1 of 1, indicate expenditures made by Young Republican National Federation for which reimbursements or loan repayments will be made by Memphis Young Republican National Convention, Inc. Please supply information regarding these debts, contracts, agreements, or promises, and provide itemization of these expenditures on Schedule B as necessary.

2
0
1
6
1
9
8
4
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0

RECEIVED
FEDERAL ELECTION
COMMISSION

'77 AUG 22 AM 9:12

Young Republican National Federation

August 19, 1977

Roger J. Stone, Jr.
Chairman, Virginia

Ann Quirk
Co-Chairman, Texas

Sherril Gordon
Secretary, Utah

Lou Barnett
Treasurer, California

Linda Wilson Reed
Assistant Secretary,
South Carolina

Ed Stanley
Auditor, Washington

Martha McCrery
National Vice Chairman-
At-Large, Illinois

Neal Acker
General Counsel, Alabama

James Byrnes
Executive Director,
Pennsylvania

Kay Ford
Assistant to the Chairman

310 First Street, S.E.
Washington, D.C. 20003
(202) 484-6680

\$333.00 is for suite rental at the National Convention in Memphis

2,470.26 is for printing and mailing costs for promotion of the convention in Memphis.

2,998.80 is the approximate percentage of the YRNF is to receive from the Convention registrants.

VC, IS. SAFER, SEYMOUR AND

ATTORNEYS AT LAW

52 EAST GAY STREET

POST OFFICE BOX 1008

COLUMBUS, OHIO 43216

614-484-8400
CABLE VORYSETER

WRITER'S DIRECT DIAL NUMBER

614-484-

October 11, 1977

RECEIVED
OCT 14 1977
10:55
CITY OF COLUMBUS
1800 N. STREET, R.M.
302-200-2020

#7

Mr. David Greevy
Federal Election Commission
1325 K. Street, N.W.
Washington, D. C. 20463

Dear Mr. Greevy:

Pursuant to our conversation today, YRNF is compiling a list of registrants to its 1977 convention in Memphis that will total the amount paid to the YRNF by Young Republican National Convention, Inc., the sponsoring committee.

YRNF shall submit the list as soon as it is complete and such submission, as I understand your comments, will fulfill YRNF's reporting responsibility. If this is not correct, please notify me immediately.

Sincerely,

Paul Manafort
Paul Manafort

PM/pr

cc: Mr. Roger Stone

00040180193
77030603533

VORTS, SATER, SEYMOUR AND PENSE

1800 M STREET, N. W.

SUITE 800-SOUTH

WASHINGTON, D. C. 20036

RECEIVED
FEDERAL ELECTION
COMMISSION

TELEPHONE
202-296-2929
CABLE ADDRESS
VORYSATER

178 EAST BAY STREET
COLUMBUS, OHIO 43212
TELEPHONE
614-464-6400

2:04

#16

April 27, 1979

Re: 3SV1-78-33

David Greevy
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear David:

As I have indicated to you in previous conversations, I had the Executive Director of the YRNF collect the information representing the transfers from YRNC '79 to the Young Republican National Federation. I have enclosed a list of the expenses incurred by the YRNF at the Memphis convention. You will notice that this total corresponds with the total amount of payments made by YRNC '77 to the YNRF.

I assume this answers your inquiry regarding the transfer. If you have any other questions, please contact me.

Sincerely,

Paul J. Manafort

Paul J. Manafort

PJM/pg

00040180194

Young Republican National Federation

Expenses Incurred by YRNF Staff at Memphis Convention

Roger J. Stone, Jr.
Chairman, Virginia

Ann Quirk
Co-Chairman, Texas

Sherrill Gordon
Secretary, Utah

Lou Barnett
Treasurer, California

Linda Wilson Reed
Assistant Secretary,
South Carolina

Ed Stanley
Auditor, Washington

Martha McCreary Brunnelle
National Vice Chairman-
At-Large, Illinois

James Turner
Assistant Treasurer, Ohio

Noal Acker, Esq.
General Counsel, Alabama

James L. Byrnes, Esq.
Executive Director,
Pennsylvania

Kay Ford
Assistant to the Chairman

310 First Street, S.E.
Washington, D.C. 20003
(202) 484-5680

B. Black's salary	\$763.06
Brasington's salary	499.50
B. Holz's salary	50.14
C. Leonard's salary	196.48
Brasington's expenses	405.28
Holz's bill at Holiday Inn	31.38
Brasington " "	238.76
Leonard " "	103.87
Black " "	342.51
Black's expenses	75.00
Black's airfare to Memphis	358.95
Black per diem	377.00
C. Neideffer-parking & consulting	450.00
Brasington-airfare to Memphis	300.00
Brasington-additional chg. airfare	24.00
Brasington per diem	120.00
Leonard airfare & per diem	270.00
B. Holz per diem	105.00
Leonard expenses	100.00
B. Holz expenses	16.38
Leonard expenses	100.00
Black mileage to Memphis	40.80

\$4,976.11

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Young Republican National Federation)

MJR 1044

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on December 7, 1979, the Commission determined by a vote of 5-1 to send the letter with questions attached to the General Counsel's First Report on MJR 1044.

Commissioners Friedersdorf, Harris, McGarry, Reiche, and Tiernan voted affirmatively for the action; Commissioner Aikens dissented.

Attest:

12/7/79

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

00040180196



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*

FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*

DATE: NOVEMBER 28, 1979

SUBJECT: MUR 1044 - Comments

Attached is a copy of Commissioner Reiche's
vote sheet with comments regarding MUR 1044.

This MUR had previously been objected to and has
been placed on the agenda for December 5, 1979.

ATTACHMENT:
Copy of Vote Sheet

60040180197



FEDERAL ELECTION COMMISSION

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

Date and Time Transmitted: 11-28-79

2:00

Commissioner FRIEDERSDORF, AIKENS, TIERNAN, McGARRY, REICHE, HARRISRETURN TO OFFICE OF COMMISSION SECRETARY BY: 11-27-79

2:00

MUR No. 1044 First General Counsel's Report dated 11-21-79.

- (☒) I approve the recommendation
() I object to the recommendation

COMMENTS:

Query -- were the services which
the Convention Committee paid for billed
to them at commercial rates?

Date: 11/27/79Signature: Frank P. Reiche

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



86108101000



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *LF*

DATE: NOVEMBER 27, 1979

SUBJECT: MUR 1044

The above-named document was circulated to the Commission on a 48-hour basis at 2:00 p.m., November 23, 1979.

Commissioner Aikens submitted an objection at 3:19 p.m., November 27, 1979, thereby placing MUR 1044 on the Executive Session agenda for December 5, 1979.

10040180190

November 21, 1979

MEMORANDUM TO: Marjorie W. Ramona

FROM: Elissa T. Carr

SUBJECT: MUR 8044

Please have the attached First GC Report on MUR 1244

distributed to the Commission on a 15 hour tally.

Thank you

00040180300

FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION

11-21-79

79 NOV 21

MUR. No. 1044
STAFF MEMBER(S)

Tarrant

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENT'S NAME:

Memphis Young Republican National Convention '77,
Inc., Memphis, TN

RELEVANT STATUTE:

2 U.S.C. §433, §434

INTERNAL REPORTS CHECKED: Young Republican National Federation

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

On October 10, 1979, the Memphis Young Republican National Convention '77, Inc. (the Convention Committee) was referred to the Office of General Counsel by the Reports Analysis Division (RAD) for failure to register and report as a political committee, in violation of 2 U.S.C. §433 and §434.

EVIDENCE

The problem here arises out of the inconsistent explanations offered by the Young Republican National Federation (the Federation), a registered political committee, for "reimbursements" received from the Convention Committee.

On its July 10, 1977 Quarterly Report, the Federation disclosed a receipt of \$1,963.00 from the Convention Committee. Both committees, in response to surface violation letters, stated the money was a reimbursement for postage.

This report was also later amended to include an outstanding debt of \$5,802.06 owed to the Federation by the Convention Committee. In response to a Request for Additional Information (RAI) regarding this debt, the Federation itemized the \$5,802.06 as follows:

- \$333.00 - suite rental at the National Convention in Memphis
- \$2,470.26 - printing and mailing costs for promotion of Memphis Convention
- \$2,998.80 - approximate percentage the Federation was to receive from the Convention registrants

On October 11, 1977, Mr. Paul Manafort, attorney for the Federation, called RAD and explained that the October 10, 1977 Quarterly Report would be showing a \$5,000 transfer from the Convention Committee. He stated that the \$5,000 was the contract price paid by a subordinate committee such as the Convention Committee for the right to sponsor the bi-annual national convention. He further stated that this money consisted of registration fees paid by the individuals attending the convention. (See Attachment 6 of Referral)

Mr. Manafort was advised by RAD to obtain the list of those individuals. Mr. Manafort agreed and sent a letter to the Commission that same day stating the list would be submitted as soon as possible. Such a list was never provided.

However, as disclosed in the October 10, 1977 Quarterly Report filed by the Federation, a \$4,976.11 loan repayment was received from the Convention Committee. Due to the discrepancy between this figure and the previously reported outstanding debt of \$5,802.06, a RFAI was sent by RAD to the Federation. As no response was received, the Commission found reason to believe the Federation was in violation of 2 U.S.C. §434 on February 28, 1978.

On March 7, 1978, James Byrnes, Executive Director of the Federation, responded by amending the July 10 Report to show a change in the debt figure. He explained that the previous amount reported (\$5,802.06) was an estimation and that due to the differences in some bills, the final amount of the debt should read \$4,976.11.

Because this repayment was over \$1,000, another surface violation was sent to the Convention Committee informing them they may be a political committee under the Act. Mr. Ryder responded by saying the matter was being referred to the Federation's General Counsel. Due to the inadequacy of this response, the Commission found reason to believe the Convention Committee may be in violation of 2 U.S.C. §433 and §434.

Mr. Manafort responded by letter on March 20, 1979 saying the information regarding the transfers was being collected. This information was provided on April 27, 1979. This time, however, the reimbursed expenses listed were different than those previously provided. (See Attachment 16 of Referral)

PRELIMINARY ANALYSIS

In Re: AOR 1976-43, the Commission held that reimbursement for administrative support services from a non-Federal political committee to a registered political committee were not to be considered contributions under the Act provided such payments were not in excess of any amounts that the non-Federal committee would be required to pay if it had obtained similar services from another source. (See MUR 413) In addition, repayments of this nature had to be made from an account which did not contain any prohibited funds.

However, due to the fact that the Federation has provided three different sets of reasons for the reimbursements and since there is not complete information regarding the Convention Committee's source of funds, the Office of

General Counsel recommends that further questions be asked of the respondent. As reason to believe has already been found, this office recommends the attached letter be sent.

RECOMMENDATION

Send the attached letter with questions.

ATTACHMENTS

1. Referral
2. Proposed letter

00040180203

D
RAD

492
91-161

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 10/10/79

ANALYST Dug Greevy

TO: Office of General Counsel

TEAM CHIEF Bobby Werfel

THROUGH: STAFF DIRECTOR

COMPLIANCE REVIEW CB/PS

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE: Memphis Young Republican National Convention '77, Inc

TREASURER: John L. Ryder, Chairman

ADDRESS: P.O. Box 3893
Memphis, TN 38103

AFFILIATE(S):

ALLEGATION(S):	CITE:	ATTACHMENT(S)
Unregistered Political Committee	2 U.S.C. 433 & 434	1,8

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review, AND DATE: 5/2/78

ATTACHMENT

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

PERIOD COVERED FROM nla TO nla

TOTAL RECEIPTS \$ nla TOTAL EXPENDITURES \$ nla

CASH ON HAND \$ nla DEBTS \$ nla

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

3SV1/78-33, dated 10/17/78

12

3SV2/78-33, dated 2/27/79 (for inadequate response)

14

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

Telecon: Greevy with Manafort, 3/19/79

REASON(S) FOR REFERRAL:

ATTACHMENT

Response from Ryder, dated 10/30/78

13

Response from Manafort, dated 3/20/79

15

Response from Manafort, dated 4/27/79 (Question of adequacy)

16

Note: Payments made for recipient committee staff salary and expenses

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

NONE

OTHER RELEVANT INFORMATION:

3SV1/77-132, dated 9/27/77

2

Response from Manafort, dated 10/11/77, to 3SV1/77-132

3

3SV1/77-133, dated 9/27/77

2

Response from Ryder, dated 10/5/77, to 3SV1/77-133

3

Telecon: Greevy with Manafort regarding 3SV1/77-132+133 and transfer noted in 3SV1/78-33, 10/11/77

6

Manafort letter of 10/11/77 re: Part 3, Telecon of 10/11/77

RAD Form 1
August 1978
7

Schedule A

July 1976
Federal Election Commission
1325 H Street, N.W.
Washington, D.C. 20543

**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)

Page 1 of 1 forLINE NUMBER 18A

(Use separate schedule for each numbered line)

Name of Candidate or Committee in full

YOUNG REPUBLICAN NATIONAL FEDERATION

July 10, 1977 Quarterly Report

Full Name, mailing address and ZIP code

Republican National Committee
310 First St., S.E., Washington, D. C. 20003

Principal place of business

Occupation

Check if Contributor is self-employed

Aggregate Year-to-date

\$ 46,758.20

Date (month,
day, year)Amount of each
receipt this period

4/15/77

6,416.67

4/29/77

8,401.74

6/2/77

1,437.59

6/30/77

7,354.67

6/2/77

5987.08

6/23/77

17,160.45

Full Name, mailing address and ZIP code

Young Republican National Convention, Inc.
P.O. Box 3893
Memphis, Tennessee 38103

Principal place of business

Occupation

Check if Contributor is self-employed

Aggregate Year-to-date

\$ 1,963.00

Date (month,
day, year)Amount of each
receipt this period

5/9/77

1,963.00

Full Name, mailing address and ZIP code

Principal place of business

Occupation

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

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

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

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 only)

\$ 48,721.20

Printed



FEDERAL ELECTION COMMISSION

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

September 27, 1977

Lou Barnett, Treasurer
Young Republican National Federation
310 First Street, S.E.
Washington, D.C. 20003

Dear Mr. Barnett:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, (the Act) as amended. During the review of the July 10 Quarterly Report of Receipts and Expenditures filed with the Federal Election Commission, we noticed an entry indicating that you may have accepted a contribution from a non-federal committee which does not comply with the requirement that such a committee either:

"...(i) Establish a separate Federal campaign committee which shall register as a political committee. The Federal campaign committee shall establish a segregated Federal account in either a national or State bank; or

(ii) Establish a single committee with a single account to make contributions to Federal and non-Federal candidates, but only if all contributions received are permissible under the Act, and all contributors are informed that all contributions are subject to the limitations of §§110.1, 110.2, and 110.5."

The Act prohibits the acceptance of a contribution from a committee which does not comply with the requirement. A copy of that portion of your report in question is enclosed so that a review of your records can be made.

If you find the entry is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

Alternatively, if you find you have accepted a prohibited contribution, the Commission advises you to return the full amount to the donor or transfer those funds to an account not used for Federal purposes. This return or transfer should be reported immediately by letter and should be reflected as an expenditure on your next report of receipts and expenditures.



RECEIVED ELECTRIC RECORDS
Refer To: Following frames

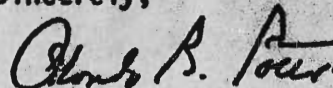
0040160207
77030603934

In reply please refer to 77-132

10/12
#2

Please notify the Commission within ten (10) days of receipt of this letter of the determination made on this matter. If you have any questions, please do not hesitate to contact David Greevy (800)-424-9530, our Reports Analyst assigned to you. Our local number is 523-4048.

Sincerely,



Orlando B. Potter
Staff Director

Enclosure
Certified Mail:
Return Receipt Requested

60040187203

77030603935



FEDERAL ELECTION COMMISSION

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

September 27, 1977

Young Republican National
Convention Inc.
Post Office Box 3893
Memphis, Tennessee 38103

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting candidates and committees to comply with the Federal Election Campaign Act, as amended. Our review of the receipts reported by other political committees indicates that your organization may have contributed in excess of \$1,000 to a committee supporting Federal candidates.

The Act defines "political committee" to mean any committee, club, association, or other group of persons which receives contributions or makes expenditures in excess of \$1,000 during a calendar year for the purpose of influencing a Federal election (2 U.S.C. 431(d)). Additionally, 2 U.S.C. 431(f)(3) states that transfers of funds to political committees which support Federal candidates are considered "expenditures". It would appear that your organization may qualify as a "political committee" under the Act.

Enclosed are relevant informational materials with regard to the Federal Election Campaign Act, including the appropriate forms for registration and reporting by political committees. Please examine these materials and, if you agree that your organization is a political committee, please submit a Statement of Organization on FEC FORM 1 within ten days of receipt of this letter. In addition, your committee will be required to file disclosure reports in accordance with the provisions of 2 U.S.C. 434 on FEC FORM 3. If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement within ten days which would clarify this matter for the public record.

If you have any questions concerning this matter, please do not hesitate to contact David Greevy (300)424-9530, our Reports Analyst assigned to you. Our local telephone number is 523-4048.

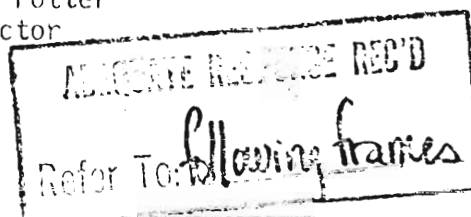
Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director



Enclosure
Return Receipt
Requested: Certified

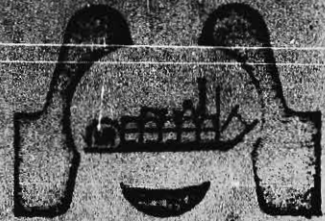


80040180209
77030603937

10/12
10/25

RECEIVED
FEDERAL ELECTION
COMMISSION

'77 OCT 10 AM 9:56



YOUNG REPUBLICAN
NATIONAL CONVENTION '77

P.O. BOX 3893, MEMPHIS, TN 38103

October 5, 1977

#3

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

Re: 3SV1/77-133

Dear Mr. Potter:

This will acknowledge receipt of your letter of September 27, 1977. Our initial impression is that the Commission must be in error. The item noted in your letter appears to have been a reimbursement for postage. However, we are referring this matter to counsel for proper evaluation and response. We will submit a response within such time as you may require.

Very truly yours,

John Ryder,
Chairman

JIM PATE, VICE CHAIRMAN
JIM RYDER, CHAIRMAN
DIRECTORS: VICKI DUNN JIMMY EXUM
JANE MARTIN CINDY MURPHY ART SULLIVAN DON L.

00040180210
77030603940

VORSE SATER, SEYMOUR AND SE

ATTORNEYS AT LAW

52 EAST GAY STREET
POST OFFICE BOX 1008
COLUMBUS, OHIO 43218

614-484-8400
CABLE VORSEATER

WRITER'S DIRECT DIAL NUMBER

614-484-

October 11, 1977

RECEIVED
FEDERAL ELECTION COMMISSION
77 OCT 14 AM 8:59
WASHINGTON
SUITE 500 SOUTH
1800 N. STREET N.W.
205-506-7000

THUR. I. VORSE 1856-1933
LOWRY F. SATER 1867-1938
AUGUSTUS T. SEYMOUR 1873-1928
LEWARD L. PEASE 1873-1924

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

RE: 3SVI/77-132

Dear Mr. Porter:

As a result of a discussion with Mr. Greevy, I am formally notifying you that the \$1,963.00 received from the Young Republican National Convention, Inc. reflected in the YRNF's July 10 Quarterly Report represents reimbursement of money advanced by the YRNF to cover postage costs of the convention committee.

YRNF will be filing an amended Schedule A, reflecting the \$1,963.00 in the proper place, Line 17.

I trust that this will satisfy your inquiry.

Sincerely,

Paul Manafort
Paul Manafort

PM/pr

cc: Mr. Roger Stone

00040180211
77030603942

**Young
Republican
National
Federation**

RECEIVED
FEDERAL ELECTION
COMMISSION

'77 JUL 13 PM 1:31

#4

July 12, 1977

Roger J. Stone, Jr.
Chairman, Virginia

Ann Quirk
Co-Chairman, Texas

Sherril Gordon
Secretary, Utah

Lou Barnett
Treasurer, California

Linda Wilson Reed
Assistant Secretary,
South Carolina

Ed Stanley
Auditor, Washington

Martha McCrery
National Vice Chairman-
At-Large, Illinois

Neal Acker
General Counsel, Alabama

James Byrnes
Executive Director,
Pennsylvania

Kay Ford
Assistant to the Chairman

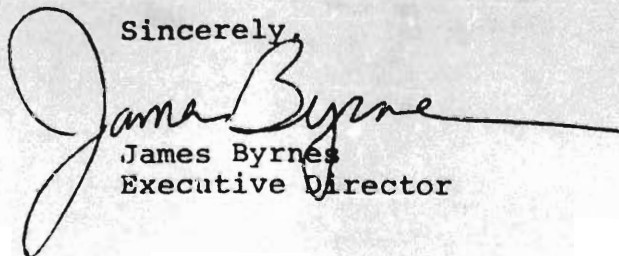
310 First Street, S.E.
Washington, D.C. 20003
(202) 484-6680

Federation Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

Dear Sirs:

Enclosed is an addition to the FEC Report
filed by the Young Republican National Federation
on July 11, 1977.

Sincerely,


James Byrnes
Executive Director

JB/kef

enclosures (3)

Commission
N.W.
C.C. 20463

Detailed Summary Schedule of Receipts and Expenditures

(Page 2)

REPORT COVERING THE PERIOD
FROM 4/1/77 TO: 6/30/77
Column A/
This Period : 3/
Column B/
Calendar year:

Name of Candidate or Committee

YOUNG REPUBLICAN NATIONAL FEDERATION

PART I - RECEIPTS

15 Contributions and other income:

(a) Itemized (use Schedule A)

(b) Unitemized

(c) Sales and Collections Included Above:

List by event on memo Schedule D (\$

(d) Subtotal of contributions and other income

16 Loans and Loan Repayments Received:

(a) Itemized (use Schedule A)

(b) Unitemized

(c) Subtotal of loans and loan repayments received

17 Refunds, Rebates, Returns Received:

(a) Itemized (use Schedule A)

(b) Unitemized

(c) Subtotal of refunds, rebates, returns

18 Transfers In:

(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)

(b) From other Committees (Itemize on Schedule A Regardless of Amount)

(c) Subtotal of transfers in

19 Total Receipts

PART II - EXPENDITURES

20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):

(a) Itemized (use Schedule B)

(b) Unitemized

(c) Subtotal of operating expenditures

21 Independent Expenditures (use Schedule E)

22 Loans, Loan Repayments, and Contribution Refunds Made:

(a) Itemized (use Schedule B)

(b) Unitemized

(c) Subtotal of loans and loan repayments made and contribution refunds

23 For Use Only By Presidential Campaigns Receiving Federal Funds, Exempt Fundraising, Legal and Accounting Expenditures:

(a) Itemized (use Schedule B)

(b) Unitemized

(c) Subtotal of fundraising expenditures

24 Transfers Out:

(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)

(b) To Other Committees (Itemize on Schedule B Regardless of Amount)

(c) Subtotal of transfers out

25 Total Expenditures

PART III - DEBTS AND OBLIGATIONS

26 Debts and obligations owed to the Committee (Itemize all on Schedule C)

27 Debts and obligations owed by the Committee (Itemize all on Schedule C)

PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES

28 Total Receipts (from line 19)

29 Transfers In (from line 18(a))

30 Net Receipts (Subtract line 29 from line 28)

31 Total Expenditures (from line 25)

32 Transfers out (from line 24(a))

33 Net Expenditures (Subtract line 32 from line 31)

77030561858

Debits 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)

Commission
 N.W.
 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 DC's	Outstanding Balance at Close of This Period
YOUNG REPUBLICAN NATIONAL FEDERATION				
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Memphis Young Republican National Convention, Inc.	6/10/77	333.00		
P. O. Box 3893	6/10/77	2,470.26		
Memphis, Tennessee 38103	6/10/77	2,998.80		5,802.06
National Convention Expenses				
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)	\$	\$	\$
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)	▶	\$ 5,802.06	\$	\$ 5,802.06

Carry outstanding balance only, to appropriate line of summary.

77030562859

Young Republican National Federation

Roger J. Stone, Jr.
Chairman, Virginia

Ann Quirk
Co-Chairman, Texas

Sherril Gordon
Secretary, Utah

Lou Barnett
Treasurer, California

Linda Wilson Reed
Assistant Secretary,
South Carolina

Ed Stanley
Auditor, Washington

Martha McCrery
National Vice Chairman-
At-Large, Illinois

Neal Acker
General Counsel, Alabama

James Byrnes
Executive Director,
Pennsylvania

Kay Ford
Assistant to the Chairman

310 First Street, S.E.
Washington, D.C. 20003
(202) 484-6680

RECEIVED
FEDERAL ELECTION
COMMISSION

'77 AUG 22 AM 9:12

#5

August 19, 1977

Federal Election Commission
1325 K Street NW
Washington, D. C. 20003

Dear Mr. Potter:

Enclosed is the information that you requested in
your letter of August 11, 1977.

If there is any additional information that you
need, please feel free to contact me.

Sincerely,

James L. Byrnes
James L. Byrnes
Executive Director

JLB/kef

FEDERAL ELECTION COMMISSION

1325 K Street, N.W.
Washington, D.C. 20463

DG/3

Young Republican National Federation

DATE: Aug. 11, 1977

I.D. NO.: C00060046

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

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

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

Coverage Dates — omitted or — incorrect

Signature — omitted or — incorrect

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

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

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

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

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

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

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

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

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

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

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

Inadequate Description of — proceeds — dates — events — location of Schedule —

Other: Please See Page Two

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

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

Young Republican National Federation
July 10 Quarterly-Amendment Report-1977

The entries of debts and obligations owed to the Young Republican National Federation by Memphis Young Republican National Convention, Inc., itemized on Schedule C, Line 26, Page 1 of 1, indicate expenditures made by Young Republican National Federation for which reimbursements or loan repayments will be made by Memphis Young Republican National Convention, Inc. Please supply information regarding these debts, contracts, agreements, or promises, and provide itemization of these expenditures on Schedule B as necessary.

2
7
4
2
8
8
1
2
1
0
0

Young Republican National Federation

RECEIVED
FEDERAL ELECTION
COMMISSION

'77 AUG 22 AM 9:12

August 19, 1977

Roger J. Stone, Jr.
Chairman, Virginia

Ann Quirk
Co-Chairman, Texas

Sherril Gordon
Secretary, Utah

Lou Barnett
Treasurer, California

Linda Wilson Reed
Assistant Secretary,
South Carolina

Ed Stanley
Auditor, Washington

Martha McCrery
National Vice Chairman-
At-Large, Illinois

Neal Acker
General Counsel, Alabama

James Byrnes
Executive Director,
Pennsylvania

Kay Ford
Assistant to the Chairman

310 First Street, S.E.
Washington, D.C. 20003
(202) 484-6680

\$333.00 is for suite rental at the National Convention in Memphis

2,470.26 is for printing and mailing costs for promotion of the convention in Memphis.

2,998.80 is the approximate percentage of the YRNF is to receive from the Convention registrants.

Telecon:

From: Dug Greevy

Date: October 11, 1977

Committee: Young Republican National Federation
also Young Republican National Convention, Inc.

Paul Mannafor of the YRNF called this day on several different matters.

1. Surface violation letter sent to the two committees above. The Convention committee transferred about \$1,900 to YRNF. P.M. stated that this was for reimbursement of funds spent by YRNF for postage. I stated that both committees should notify FEC of this by letter, and that YRNF should amend their report to show the receipt on Line 17, Schedule A, as reimbursement for postage.

2. RFAI on amended October 10 Quarterly, 1976, itemizing source of cash on hand, January 1, 1976. Mannafor stated that he submitted this information. What he submitted was receipts in the amount of about \$25,000. I told him that the committee was mistaken in the amount of cash on hand for which the sources had to be accounted. They evidently took the amount of cash on hand June 1, 1976, as that amount for which they had to make an accounting. The amount of cash on hand January 1, 1976, was, after a \$5,000 adjustment made by Steven Ford, approximately \$37,000. P.M. stated that they would supply the information as soon as possible, although he is afraid that their computer service may have destroyed the tapes of the '75 information. He stated that a letter would be forthcoming stating that they were compiling the information.

* 3. P.M. stated that the new report(Q3) will show a \$5,000 transfer in from the Convention committee. He stated that YRNF contracts out the right of a subordinate committee to sponsor the bi-annual national convention. He stated that the Memphis committee is the sponsoring committee this year, and that they have organized a separate account to handle the administrative and host details for the Convention. The contract price is \$5,000, and this is what will be shown on the Q3. He stated that their attorneys have determined that the Convention committee is not a political committee under the ACT, and therefore they should not have to register with FEC. Furthermore, he stated that the \$5,000 was received exclusively as registration fees for individuals attending the convention, and that the money would be used by YRNF for only administrative matters. I told him that probably the easiest way to provide FEC with proper information would be for the Convention committee to provide YRNF with information concerning those individuals who provided these registration fees. In this way, YRNF could report same to FEC. I also informed him of contributor limitations regarding this transaction, and of the fact that the contributors should be informed that the money has been transferred to YRNF, a registered political committee.

4. P.M. stated that in January, 1978, YRNF will sponsor the Young Republican Leadership Conference, which is a conference held to teach Young Republicans different methods of campaigning, and of different areas of elections and election laws. He stated that a separate account will be used for this conference, and he wondered about the reporting requirements. I stated that this was an area which should be dealt with by OGC, and I advised him that he should, if he desired a definitive

answer on the matter, request an advisory opinion from OGC. I stated first that a determination may have to be made as to whether or not the Conference would constitute a political committee under the ACT, as it may be possible to construe the Conference as having an influence on Federal elections. He stated that much of the funding for the Conference is provided by corporations, and he wondered what could be done with any residual funds which the Conference might have. I stated once again that OGC could provide him with a definitive answer on these questions, and he stated that he would be submitting an AOR shortly.

00040180220

VORVY SATER, SEYMOUR AND

ATTORNEYS AT LAW

82 EAST GAY STREET
POST OFFICE BOX 1008
COLUMBUS, OHIO 43216

614-464-6400
CABLE VORVYSATER

WRITER'S DIRECT DIAL NUMBER

614-464-

ARTHUR I. VORVY 1866-1933
LEWRY F. SATER 1867-1936
AUGUSTUS T. SEYMOUR 1873-1928
EDWARD L. PEASE 1873-1924

WASHINGTON
SUITE 200 SOUTH
1800 M STREET, N.W.
205-202-2020

RECEIVED
FEDERAL ELECTION COMMISSION
OCT 19 AM 10:55

#7

October 11, 1977

Mr. David Greevy
Federal Election Commission
1325 K. Street, N.W.
Washington, D. C. 20463

Dear Mr. Greevy:

Pursuant to our conversation today, YRNF is compiling a list of registrants to its 1977 convention in Memphis that will total the amount paid to the YRNF by Young Republican National Convention, Inc., the sponsoring committee.

YRNF shall submit the list as soon as it is complete and such submission, as I understand your comments, will fulfill YRNF's reporting responsibility. If this is not correct, please notify me immediately.

Sincerely,

Paul Manafort
Paul Manafort

PM/pr

cc: Mr. Roger Stone

60040180221
77030603633

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)

LINE NUMBER 15 A
 (Use separate schedule for each numbered line)

Name of Candidate or Committee in full

YOUNG REPUBLICAN NATIONAL FEDERATION

October 10, 1977 Quarterly Report

Full Name, mailing address and ZIP code

Memphis YRNC 77

1213 Union Planters Bank Building
Memphis, Tenn. 38103

Date (month, day, year)

9/13
9/19
9/26

Amount of each receipt this period

330.00
1,000.00
3,646.11

Principal place of business

Occupation

administration of national conven.

☐ 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

☐ 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

☐ 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

☐ 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

☐ 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

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Subtotal of receipts this page (optional)

▶ \$ 4,976.11

Total this period (last page this line number only)

▶ \$ 4,976.11

800401802393
 7703059331

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

DC/3

#9

ing Republican National Federation

DATE: January 24, 1978

I.D. NO.: C00060046

REQUEST FOR ADDITIONAL INFORMATION FOR THE October 10 Quarterly REPORT OF RECEIPTS
AND EXPENDITURES COVERING THE PERIOD 7/1/77 THROUGH 9/30/77
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

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

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

Coverage Dates — omitted or — incorrect

Signature — omitted or — incorrect

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

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

Schedule ~~XXXX~~ — disagree with Detailed Summary (Page 2) or X omitted for Line 26 *

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

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

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

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

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

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

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

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

Inadequate Description of — proceeds — dates — events — location of Schedule —

* Other: Please See Page Two

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

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

Young Republican National Federation
October 10 Quarterly-1977

* In its amendment, submitted 7/12/77, to the July 10 Quarterly Report, the committee stated that the Memphis Young Republican National Convention, Inc. had debts or obligations owed to the committee in the amount of \$5,802.06. The committee stated further that it had debts or obligations owed by the committee to Shoreham Americana, in the amount of \$4,799.23.

* In this submission, the committee reported, on Schedule A, Line 16, a loan repayment from the Memphis Young Republican National Convention, Inc., in the amount of \$4,976.11. However, the committee has not included a Schedule C, for Line 26, to show the remaining amount of debts or obligations owed to the committee by the Memphis Young Republican National Convention, Inc. Please provide the circumstances for this reporting discrepancy, and amend your report accordingly.

In this submission, the committee reported, on Schedule B, Line 20, payment to Shoreham Americana, in the amount of \$3,466.44. However, the committee has not included on the Schedule C, submitted for Line 27, the remaining amount of debts or obligations owed to Shoreham Americana. Please provide the circumstances for this reporting discrepancy, and amend your report accordingly.

78030642295
00100180224



FEDERAL ELECTION COMMISSION

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

February 28, 1978

#10

Louis Barnett, Treasurer
Young Republican National Federation
310 First Street, S. E.
Washington, D.C. 20003

Dear Mr. Barnett:

On January 24, 1978, you were notified that the October 10 Quarterly Report of Receipts and Expenditures filed by your committee omitted certain required information.

As of this date, however, we have received no response from you. Your failure to amend your report gives the Commission reason to believe that you are in violation of 2 U.S.C. 434.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within ten (10) days of receipt of this letter.

If you have responded to the above or you require additional information, please contact David Greevy, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is 523-4048.

Sincerely,

Thomas E. Harris

Commissioner

Certified Mail:
Return Receipt Requested

ABSENTEE RESPONSE REC'D

Refer To: Following Frames

00040180225
78030681190

Young Republican National Federation

RECEIVED
FEDERAL ELECTION
COMMISSION

'77 MAR 8 PM 1:11

March 7, 1978

Roger J. Stone, Jr.
Chairman, Virginia

Ann Quirk
Co-Chairman, Texas

Sherrill Gordon
Secretary, Utah

Lou Barnett
Treasurer, California

Linda Wilson Reed
Assistant Secretary,
South Carolina

Ed Stanley
Auditor, Washington

Martha McCrery Brunette
National Vice Chairman-
At-Large, Illinois

James Turner
Assistant Treasurer, Ohio

Neal Acker, Esq.
General Counsel, Alabama

James L. Byrnes, Esq.
Executive Director,
Pennsylvania

Kay Ford
Assistant to the Chairman

310 First Street, S.E.
Washington, D.C. 20003
(202) 484-6680

Mr. David Greevey
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

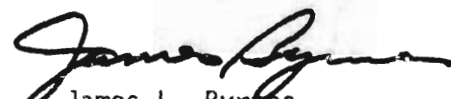
Dear Mr. Greevey:

In response to your inquiries of Jan. 24, 1978 and February 28, 1978, enclosed is an amendment to the Federal Election Commission Report filed by the Young Republican National Federation for the quarter ending 6/30/77. The amount shown on line 26, Schedule C, was reported as an estimation by us and the Memphis Young Republican National Convention, Inc. There were differences in some bills and the final amount of the debt, which was paid in full was \$4,976.11. This amendment now shows the correct figure.

Concerning the second item on which information was requested - amounts paid by the Young Republican National Federation to the Shoreham-Americana Hotel. I believe the discrepancy can be explained by an additional amount which is reported on our FEC report of September 30, 1977. On page 3 of 5 for line #20, amounts paid to the Shoreham-Americana are included in the 6th space from the top. An additional amount is continued in the 7th space as a continuation of the payment. The date of this payment, which was omitted from our report was 9/26/77.

Thank you for your cooperation. If you need any other information, please call.

Sincerely,


James L. Byrnes
Executive Director

JLB/kef

Detailed Summary Schedule of Receipts and Expenditures

(Page 2)

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

Name of Candidate or Committee YOUNG REPUBLICAN NATIONAL FEDERATION		REPORT COVERING THE PERIOD FROM: 4/1/77 TO: 6/30/77	
		Column A This Period	Column B Calendar year-to-date
PART I - RECEIPTS			
15 Contributions and other income:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Sales and Collections Included Above:			
List by event on memo Schedule D (\$			
(d) Subtotal of contributions and other income		\$	\$
16 Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments received		\$	\$
17 Refunds, Rebates, Returns Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of refunds, rebates, returns		\$	\$
18 Transfers In:			
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)		\$	
(b) From other Committees (Itemize on Schedule A Regardless of Amount)		\$	
(c) Subtotal of transfers in		\$	\$
19 Total Receipts		\$	\$
PART II - EXPENDITURES			
20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of operating expenditures		\$	\$
21 Independent Expenditures (use Schedule E)		\$	\$
22 Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments made and contribution refunds		\$	\$
23 For Use Only By Presidential Campaigns Receiving Federal Funds; Exempt Fundraising, Legal and Accounting Expenditures:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of fundraising expenditures		\$	\$
24 Transfers Out:			
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)		\$	
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)		\$	
(c) Subtotal of transfers out		\$	\$
25 Total Expenditures		\$	\$
PART III - DEBTS AND OBLIGATIONS			
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)		\$ 4,976.11	
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)		\$	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
28 Total Receipts (from line 19)		\$	
29 Transfers In (from line 18(a))		\$	
30 Net Receipts (Subtract line 29 from line 28)		\$	
31 Total Expenditures (from line 25)		\$	
32 Transfers out (from line 24(a))		\$	
33 Net Expenditures (Subtract line 32 from line 31)		\$	

00770180227

REPORT TO 6/30/77

Debits 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)

Federal 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 Close of This Period
YOUNG REPUBLICAN NATIONAL FEDERATION				
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Memphis Young Republican National Convention, Inc. P. O. Box 3893 Memphis, Tennessee 38103	6/10/77 6/10/77 6/10/77	333.00 2,470.26 2,172.85	-0-	4,976.11
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)	\$	\$	\$
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)		\$	\$	\$ 4,976.11
Carry outstanding balance only, to appropriate line of summary.				

00040180228

In reply please refer to: V1/78-33 #12



FEDERAL ELECTION COMMISSION

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

October 17, 1978

Treasurer
Memphis Young Republican
National Convention, Inc.
P.O. Box 3893
Memphis, TN 38103

Dear Sir or Madam:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. Our review of the receipts reported by Young Republican National Federation indicates that your organization may have made contributions which total in excess of \$1,000 during the calendar year. Enclosed is a copy(s) of the report(s) in which your contribution(s) is listed.

The act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures (which includes contributions to Federal candidates and committees supporting Federal candidates), aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you agree that your organization has made contributions or expenditures which qualify you as a "political committee", but you do not wish to be considered as a "political committee", you must request refund(s) from the candidate(s) and/or political committee(s) to which you have contributed. As an alternative, political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence Federal elections. Refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed \$1,000 during a calendar year.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

60040180229

Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have any questions, please contact David Greevy in our Reports Analysis Division at (800)424-9530. Our local number is (202)523-1474.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Certified Mail
Return Receipts Requested

Enclosures

60040180230

JOHN RYDER, CHAIRMAN
JIM PATE, VICE-CHAIRMAN
DIRECTORS: VICKI DUNN JIMMY EXOM JANE MARTIN CINDY MURPHY ART SULLIVAN DON SUNDQUIST

RECEIVED
FEDERAL ELECTION
COMMISSION

'78 NOV 1 AM 10:13



YOUNG REPUBLICAN
NATIONAL CONVENTION '77

P.O. BOX 3893, MEMPHIS, TN 38103

October 30, 1978

#13

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

Re: 3SV1/78-33

Dear Mr. Potter:

We are in receipt of your letter of October 17, 1978. We refer you to your letter of September 27, 1977 (Reference No. 3SV1/77-133) and the related responses. It appears that we've been over this ground before. We do not agree that our organization is a political committee as defined by the Federal Election Campaign Act.

This matter has been referred to the general counsel for the Young Republican National Federation for further clarification and response.

Very truly yours,

John L. Ryder, Chairman
Y.R.N.C.77, Inc.

JLR/ap



FEDERAL ELECTION COMMISSION

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

February 27, 1979

#14

John L. Ryder, Chairman
Memphis Young Republican National Convention, Inc.,
P.O. Box 3893
Memphis, TN 38103

Dear Mr. Ryder:

On October 17, 1978, you were notified that you may have made contributions to a political committee which raised problems under 2 U.S.C. 433 and 434.

We received a response from you on November 1, 1978, however, we found your response to be inadequate. Your failure to provide an adequate response gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 433 and 434.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above or you require additional information, please contact David Greedy, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is (202)523-1474.

Sincerely,

Joan D. Aikens
Commissioner

Certified Mail:
Return Receipt Requested

00040180232

VORYS, SATER, SEYMOUR AND PEASE

1800 M STREET, N. W.
SUITE 800-SOUTH
WASHINGTON, D. C. 20036

TELEPHONE
202-296-2929
CABLE ADDRESS
VORYSATER

RECEIVED
FEDERAL ELECTION
COMMISSION

'79 MAR 22 11 13 AM
52 EAST GAY STREET
COLUMBUS, OHIO 43215
TELEPHONE
614-464-6400

March 20, 1979

#15

David Greevy
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: 3SV1/78-33

Dear David:

Pursuant to our telephone conversation, I have asked the Executive Director of the YRNF to collect the information representing the transfers from YRNC '79 to YRNF. Upon receipt of said information, I shall be in contact with you.

Meanwhile, any further questions regarding YRNC '79 should be directed to Mr. Lihn or me. Mr. Ryder is no longer involved in this matter.

Sincerely,



Paul J. Manafort

PJM/pg
cc: Charles Lihn

00040180233

VORYS, SATER, SEYMOUR AND PEASE

1800 M STREET, N. W.
SUITE 800-SOUTH
WASHINGTON, D. C. 20036

TELEPHONE
202-296-2929
CABLE ADDRESS
VORYSATER

170 EAST GAY STREET
COLUMBUS, OHIO 43215
TELEPHONE
614-264-8400

RECEIVED
FEDERAL ELECTION
COMMISSION

April 27, 1979

Re: 3SV1-78-33

David Greevy
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear David:

As I have indicated to you in previous conversations, I had the Executive Director of the YRNF collect the information representing the transfers from YRNC '79 to the Young Republican National Federation. I have enclosed a list of the expenses incurred by the YRNF at the Memphis convention. You will notice that this total corresponds with the total amount of payments made by YRNC '77 to the YNRF.

I assume this answers your inquiry regarding the transfer. If you have any other questions, please contact me.

Sincerely,

Paul J. Manafort

Paul J. Manafort

PJM/pg

80040180234

#16

2:04

Young Republican National Federation

Expenses Incurred by YRNF Staff at Memphis Convention

Roger J. Stone, Jr.
Chairman, Virginia

Ann Quirk
Co-Chairman, Texas

Sherrill Gordon
Secretary, Utah

Lou Barnett
Treasurer, California

Linda Wilson Reed
Assistant Secretary,
South Carolina

Ed Stanley
Auditor, Washington

Martha McCrery Brunette
National Vice Chairman-
At-Large, Illinois

James Turner
Assistant Treasurer, Ohio

Neal Acker, Esq.
General Counsel, Alabama

James L. Byrnes, Esq.
Executive Director,
Pennsylvania

Kay Ford
Assistant to the Chairman

310 First Street, S.E.
Washington, D.C. 20003
(202) 484-6680

B. Black's salary	\$763.06
Brasington's salary	499.50
B. Holz's salary	50.14
C. Leonard's salary	196.48
Brasington's expenses	405.28
Holz's bill at Holiday Inn	31.38
Brasington " "	238.76
Leonard " "	103.87
Black " "	342.51
Black's expenses	75.00
Black's airfare to Memphis	358.95
Black per diem	377.00
C. Neideffer-parking & consulting	450.00
Brasington-airfare to Memphis	308.00
Brasington-additional chg. airfare	24.00
Brasington per diem	120.00
Leonard airfare & per diem	270.00
B. Holz per diem	105.00
Leonard expenses	100.00
B. Holz expenses	16.38
Leonard expenses	100.00
Black mileage to Memphis	40.80

\$4,976.11



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Attachment 2

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Paul Manafort
Vorys, Sater, Seymour
and Pease
Suite 800
1800 M Street, N.W.
Washington, D.C.

Re: MUR 1044

Dear Mr. Manafort:

As you are aware, the Federal Election Commission previously found reason to believe that your clients, the Memphis Young Republican National Convention '77, Inc. (the Convention Committee), may have violated sections 433 and 434 of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that the Convention Committee, in transferring \$4,976 to the Young Republican National Federation, may have qualified as a political committee and therefore would be required to register and report as such.

The matter has now been referred to the Office of General Counsel and is numbered MUR 1044. Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your client. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Additionally, please submit answers to the enclosed questions. Where appropriate, statements should be submitted under oath. In this connection, we have already considered your letters of October 11, 1977 and April 27, 1979 and your numerous phone calls to the Commission. We request your response to be submitted within two weeks after your receipt of this notification.

If you have any questions, please contact Marybeth Tarrant, the staff member now assigned to this matter, at 202-523-4175.

00010180236

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

Sincerely,

Charles N. Steele
Acting General Counsel

Enclosures

Questions
Letters

80040180237

QUESTIONS

In view of the inconsistent explanations offered by the Young Republican National Federation (the Federation) for the reimbursement of \$4,976.00 from the Convention Committee (see attached letters), please answer the following questions.

1. Explain the discrepancy between the breakdown of the \$5,802.06 debt (later amended to \$4,976.11) given by James Byrnes and your subsequent itemization of the debt given April 27, 1979.
2. In a conversation with Doug Greevy of our Reports Analysis Division on October 11, 1977, you stated that \$5,000 had been transferred to the Federation by the Convention Committee. You further stated this was the contract price paid by the Convention Committee for the right to sponsor the convention and that the money consisted of registration fees paid by individuals attending the convention. A list of these individuals was to be provided (see your letter of October 11, 1977). Please explain why such a transfer was never reported and why this list of individuals was never provided.
3. Please state the purpose of the convention.
4. Please provide information regarding the Convention Committee's source of funds used to reimburse the Federation.
5. Please provide copies of any bills, statements, memoranda, etc. in connection with the above questions.

00010180238

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

1044

DATE 10/10/79

ANALYST Dug Greevy

TO: Office of General Counsel

TEAM CHIEF Bobby Werfel *BSH*

THROUGH: STAFF DIRECTOR *ONB*

COMPLIANCE REVIEW CB/PS

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *JD H*

CANDIDATE/COMMITTEE: Memphis Young Republican National Convention '77, Inc

TREASURER: John L. Ryder, Chairman

ADDRESS: P.O. Box 3803
Memphis, TN 38103

AFFILIATE(S):

ALLEGATION(S): CITE: ATTACHMENT(S)
Unregistered Political Committee 2 U.S.C. 433 & 434 1

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review, AND DATE: 5/2/78

ATTACHMENT

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

PERIOD COVERED FROM nla TO nla

TOTAL RECEIPTS \$ nla TOTAL EXPENDITURES \$ nla

CASH ON HAND \$ nla DEBTS \$ nla

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

3SV1/78-33, dated 10/17/78

2

3SV2/78-33, dated 2/27/79 (for inadequate response)

3

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

Telecon: Greevy with Manafort, 3/19/79

4

REASON(S) FOR REFERRAL:

ATTACHMENT

Response from Ryder, dated 10/30/78

5

Response from Manafort, dated 3/20/79

6

Response from Manafort, dated 4/27/79 (Question of adequacy)

7

Note: Payments made for recipient committee staff salary and expenses

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

NONE

OTHER RELEVANT INFORMATION:

3SV1/77-132, dated 9/27/77

8

Response from Manafort, dated 10/11/77, to 3SV1/77-132

9

3SV1/77-133, dated 9/27/77

10

Response from Ryder, dated 10/5/77, to 3SV1/77-133

11

Telecon: Greevy with Manafort regarding 3SV1/77-132+133 and transfer noted in 3SV1/78-33, 10/11/77

12

Manafort letter of 10/11/77 re: Part 3, Telecon of 10/11/77

Note: The information was not provided.

RAD Form 1

August 1978

13

0040180240

INSTRUCTIONS FOR REPORTS ANALYSIS REFERRAL SHEET

The Analyst must prepare two copies of the referral and all attachments to go forward through his/her Team Chief. Referrals will pass through logging procedures established by each team before being passed to the Compliance Analyst. Neither the analyst nor the respective team can keep a copy of the referral. One copy of the referral will be maintained by the Compliance Analyst for the Division.

The form is divided into categories of specific information. The top portion of the form contains the basic information needed to identify those entities involved in the referral. If the allegations include more than one entity, each must be referred individually. As a suggested technique, the analyst could fill out the sections on one form which would pertain to all of the related entities. That form could be copied and then the particulars of each entity could be added. In any case, one of the referral forms should be used to show the relationship between the related referrals. In addition, the RAD File No. that will be assigned to each referral sheet will be used to identify those referrals which are related. For instance, there may be one principal committee and ten affiliated or related committees. The file number assigned to the principal committee could be No. 10 and the remaining affiliated committees would be numbered 10A, 10B, 10C, etc.

The space "Affiliate(s)" will provide affiliated committees, if any are pertinent to the allegation(s) contained in the referral.

The "Allegation(s)" section contains three columns. The first column provides space for an indication of the type of violation. Failure to provide complete identifying information on contributors is one example. The second column will contain the specific section of the Act and/or regulations involved and the third column asks for the appropriate attachment number. Attachments will usually be pertinent sections of reports, memoranda from the candidate/committee, etc. which support the contention that the Act has been violated.

The space for "Manner In Which Review was Initiated if Other than Normal Review, and Date", will provide the date the analyst discovered the suspected violation and initiated compliance procedures, such as submitting an RFAI or SV transmittal to the analyst on his team responsible for tracking compliance matters. Additional information will be provided only if review was initiated by other than regular reports review, referral from another team, and review of computer runs.

The "Reports" section will provide information to both the Audit Division and the General Counsel which will give them some idea of the financial situation of the candidate/committee and an idea of the complexity of the problem. Please note that the analyst should include the appropriate indices as Attachment 1. Should the indices not reflect a

complete picture of the reports reviewed, RFAI's sent, etc., the analyst should add that information on the indices. The analyst should also indicate on the indices those items which were reviewed (circle or check) by checking the stat sheet of each report listed. Reports reviewed before the discovery of the suspected violation will not receive additional review unless it is necessary to provide information pertinent to the allegation(s) on the referral.

The "History" section will be used by the analyst to chronologically trace the apparent violation(s). "Results of Review" will list the attempts of the analyst to obtain compliance (RFAI, SV, RTB letters sent and date). All appropriate documentation should be included as attachments.

"Communications with Candidate/Committee" will indicate any telephone contact, whether initiated by the candidate/committee or the analyst, and the appropriate documentation (telecon) as the attachment.

The space "Reason for the Referral" is used to indicate committee/candidate response or lack thereof to our attempts to obtain compliance. If a response is adequate but meets a Commission threshold for review by the General Counsel (Refer to 3/15/78 and 5/25/78 Memoranda Regarding Commission thresholds for initiation of MURS), then state the specific threshold involved. If an inadequate response is received, then relate why it is inadequate.

The space "Other Pending Actions Initiated by RAD" may be used for showing other problems which the candidate/committee is currently having even though the problems are not necessarily related to the referral, such as outstanding RFAI's, RTB's and referrals to other divisions.

"Other Relevant Information" may include problems which the candidate/committee has had or is currently having, such as recurring reporting problems, if pertinent to the allegations contained in the referral.

The space "Previous OGC/Audit Referrals from RAD" will be completed by the Division's Compliance Analyst. Any previous referrals of the candidate/committee to other divisions will be indicated, even though the problems are not necessarily related to the current referral.

If any of the specific categories of information listed on the form do not pertain to the allegations of the suspected violation that is being referred, the analyst shall note: "not pertinent to the allegation(s)" in the appropriate space.

It should be noted that requests for additional research or analysis must be requested in writing through the Assistant Staff Director of the Reports Analysis Division by the attorney or auditor.

Module A
July 1976
Federal Election Commission
325 K Street, N.W.
Washington, D.C. 20463

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)

LINE NUMBER 16 A
(Use separate lines for each numbered line)

Name of Candidate or Committee in full

YOUNG REPUBLICAN NATIONAL FEDERATION

Full Name, mailing address and ZIP code

Memphis YRNC 77
1213 Union Planters Bank Building
Memphis, Tenn. 38103

Date (month,
day, year)

Amount of each
receipt this period

9/13

330.00

9/19

1,000.00

9/26

3,646.11

Principal place of business

Occupation

administration of national conven

☐ 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

☐ 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

☐ 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

☐ 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

☐ 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

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Subtotal of receipts this page (optional) ▶ \$ 4,976

Total this period (last page this line number only) ▶ \$ 4,976

80040180243
7703059301



FEDERAL ELECTION COMMISSION

1025 K STREET N.W.
WASHINGTON, D.C. 20463

October 17, 1978

Treasurer
Memphis Young Republican
National Convention, Inc.
P.O. Box 3893
Memphis, TN 38103

Dear Sir or Madam:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. Our review of the receipts reported by Young Republican National Federation indicates that your organization may have made contributions which total in excess of \$1,000 during the calendar year. Enclosed is a copy(s) of the report(s) in which your contribution(s) is listed.

The act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures (which includes contributions to Federal candidates and committees supporting Federal candidates), aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you agree that your organization has made contributions or expenditures which qualify you as a "political committee", but you do not wish to be considered as a "political committee", you must request refund(s) from the candidate(s) and/or political committee(s) to which you have contributed. As an alternative, political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence Federal elections. Refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed \$1,000 during a calendar year.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

00040180243

-2-
Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have any questions, please contact David Greevy in our Reports Analysis Division at (800)424-9530. Our local number is (202)523-1474.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Certified Mail
Return Receipts Requested

Enclosures

00040180244



FEDERAL ELECTION COMMISSION

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

February 27, 1979

John L. Ryder, Chairman
Memphis Young Republican National Convention, Inc.,
P.O. Box 3893
Memphis, TN 38103

Dear Mr. Ryder:

On October 17, 1978, you were notified that you may have made contributions to a political committee which raised problems under 2 U.S.C. 433 and 434.

We received a response from you on November 1, 1978, however, we found your response to be inadequate. Your failure to provide an adequate response gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 433 and 434.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above or you require additional information, please contact David Greevy, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is (202)523-1474.

Sincerely,

John D. Aikens
Commissioner

Certified Mail:
Return Receipt Requested

60040180245

3501/78-33

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

The following service is requested (check one).

- ☒ Show to whom and date delivered.....c
☒ Show to whom, date, and address of delivery.....c
☐ RESTRICTED DELIVERY
☐ Show to whom and date delivered.....c
☐ RESTRICTED DELIVERY
☐ Show to whom, date, and address of delivery. \$_____
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Memphis YRNC
TN

3. ARTICLE DESCRIPTION:

REGISTERED NO. CERTIFIED NO. INSURED NO.

443662

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☒ Addressee ☐ Authorized agent

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

FRONT

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆GPO. 1977-0-249-595

10/17

3502/78-33

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

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

- ☐ Show to whom and date delivered.....c
☒ Show to whom, date, and address of delivery.....c
☐ RESTRICTED DELIVERY
☐ Show to whom and date delivered.....c
☐ RESTRICTED DELIVERY
☐ Show to whom, date, and address of delivery. \$_____
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Lyder
Memphis YRNC

3. ARTICLE DESCRIPTION:

REGISTERED NO. CERTIFIED NO. INSURED NO.

438670

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆GPO. 1977-0-249-595

2/27

Telecon:

Dug Greevy with Paul Mannafort
Young Republican National Federation
3/19/79

Re: SV regarding Young Republican Leadership Conference—recipient committee will refund the \$2,000 which is in excess of the \$1,000. Letter will be sent to this effect.

RE: SV regarding Memphis Young Republican Convention Committee—recipient committee used this committee to administrate all areas of the convention held in Memphis. Payments back and forth represented reimbursements for goods or services provided. Of the \$4,900 transferred, the committee previously responded to FEC (in 1977) concerning transfer in of about \$1,976, which represented reimbursement for postage. I told him that the 10/17 letter was sent because of the additional transfers. He will be responding shortly.

*Note: Highlighted Statement incorrect
\$1976 not included in \$4900 plus.*

Dg 3/27/79

00040180247

JOHN RYDER, CHAIRMAN
JIM PATE, VICE-CHAIRMAN
DIRECTORS: VICKI DUNN, JIMMY EXUM, JANE MARTIN, CINDY MURPHY, ART SULLIVAN, DON SUNDOWSKI

78030960064

FEDERAL ELECTION COMMISSION

'78 NOV 1 AM 10:13



YOUNG REPUBLICAN
NATIONAL CONVENTION '77

P.O. BOX 3893, MEMPHIS, TN 38103

October 30, 1978

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

Re: 3SV1/78-33

Dear Mr. Potter:

We are in receipt of your letter of October 17, 1978. We refer you to your letter of September 27, 1977 (Reference No. 3SV1/77-133) and the related responses. It appears that we've been over this ground before. We do not agree that our organization is a political committee as defined by the Federal Election Campaign Act.

This matter has been referred to the general counsel for the Young Republican National Federation for further clarification and response.

Very truly yours,

John L. Ryder, Chairman
Y.R.N.C. '77, Inc.

JLR/ap

VORYS, SATER, SEYMOUR AND PEASE

1800 M STREET, N.W.
SUITE 200-SOUTH
WASHINGTON, D.C. 20036

RECEIVED
FEDERAL ELECTION
COMMISSION

TELEPHONE
202-296-2929
CABLE ADDRESS
VORYSATER

79 MAR 22 1979
87 EAST GAY STREET
CHICAGO, ILL. 60611
TELEPHONE
312-464-6400

March 20, 1979

David Greevy
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: 3SV1/78-33

Dear David:

Pursuant to our telephone conversation, I have asked the Executive Director of the YRNF to collect the information representing the transfers from YRNC '79 to YRNF. Upon receipt of said information, I shall be in contact with you.

Meanwhile, any further questions regarding YRNC '79 should be directed to Mr. Lihn or me. Mr. Ryder is no longer involved in this matter.

Sincerely,

Paul J. Manafort
Paul J. Manafort

PJM/pg
cc: Charles Lihn

00040180249.

VORYS, SATER, SEYMOUR AND PEASE

1800 M STREET, N. W.
SUITE 800-SOUTH
WASHINGTON, D. C. 20036

TELEPHONE
202-296-2929
CABLE ADDRESS
VORYSATER

RECEIVED
FEDERAL ELECTION
COMMISSION
172 EAST DAY STREET
COLUMBUS, OHIO 43219
TELEPHONE
614-464-6400

April 27, 1979

Re: 3SV1-78-33

David Greevy
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear David:

As I have indicated to you in previous conversations, I had the Executive Director of the YRNF collect the information representing the transfers from YRNC '79 to the Young Republican National Federation. I have enclosed a list of the expenses incurred by the YRNF at the Memphis convention. You will notice that this total corresponds with the total amount of payments made by YRNC '77 to the YNRF.

I assume this answers your inquiry regarding the transfer. If you have any other questions, please contact me.

Sincerely,

Paul J. Manafort
Paul J. Manafort

PJM/pg

00040180250

Young Republican National Federation

Expenses Incurred by YRNF Staff at Memphis Convention

Roger J. Stone, Jr.
Chairman, Virginia

Ann Quirk
Co-Chairman, Texas

Sherrill Gordon
Secretary, Utah

Lou Barnett
Treasurer, California

Linda Wilson Reed
Assistant Secretary,
South Carolina

Ed Stanley
Auditor, Washington

Martha McCrery Brunnette
National Vice Chairman-
At-Large, Illinois

James Turner
Assistant Treasurer, Ohio

Neal Acker, Esq.
General Counsel, Alabama

James L. Bymes, Esq.
Executive Director,
Pennsylvania

Kay Ford
Assistant to the Chairman

B. Black's salary	\$763.06
Brasington's salary	499.50
B. Holz's salary	50.14
C. Leonard's salary	196.48
Brasington's expenses	405.28
Holz's bill at Holiday Inn	31.38
Brasington " "	238.76
Leonard " "	103.87
Black " "	342.51
Black's expenses	75.00
Black's airfare to Memphis	358.95
Black per diem	377.00
C. Neideffer-parking & consulting	450.00
Brasington-airfare to Memphis	308.00
Brasington-additional chg. airfare	24.00
Brasington per diem	120.00
Leonard airfare & per diem	270.00
B. Holz per diem	105.00
Leonard expenses	100.00
B. Holz expenses	16.38
Leonard expenses	100.00
Black mileage to Memphis	40.80

\$4,976.11

310 First Street, S.E.
Washington, D.C. 20003
(202) 484-6680



FEDERAL ELECTION COMMISSION

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

September 27, 1977

Lou Barnett, Treasurer
Young Republican National Federation
310 First Street, S.E.
Washington, D.C. 20003

Dear Mr. Barnett:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, (the Act) as amended. During the review of the July 10 Quarterly Report of Receipts and Expenditures filed with the Federal Election Commission, we noticed an entry indicating that you may have accepted a contribution from a non-federal committee which does not comply with the requirement that such a committee either:

"...(i) Establish a separate Federal campaign committee which shall register as a political committee. The Federal campaign committee shall establish a segregated Federal account in either a national or State bank; or

(ii) Establish a single committee with a single account to make contributions to Federal and non-Federal candidates, but only if all contributions received are permissible under the Act, and all contributors are informed that all contributions are subject to the limitations of §§110.1, 110.2, and 110.5."

The Act prohibits the acceptance of a contribution from a committee which does not comply with the requirement. A copy of that portion of your report in question is enclosed so that a review of your records can be made.

If you find the entry is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

Alternatively, if you find you have accepted a prohibited contribution, the Commission advises you to return the full amount to the donor or transfer those funds to an account not used for Federal purposes. This return or transfer should be reported immediately by letter and should be reflected as an expenditure on your next report of receipts and expenditures.



ABSTRACTED
Refer To: following frames

0040180252
77030603934

Please notify the Commission within ten (10) days of receipt of this letter of the determination made on this matter. If you have any questions, please do not hesitate to contact David Greevy (800)-424-9530, our Reports Analyst assigned to you. Our local number is 523-4048.

Sincerely,



Orlando B. Potter
Staff Director

Enclosure
Certified Mail:
Return Receipt Requested

0010180253
77030603935

Schedule A

July 1976

Federal Election Commission
1325 H Street, N.W.
Washington, D.C. 20543

**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 1 back)

Page 1 of 1 for

LINE NUMBER 18A

(Use separate schedule for each numbered line)

Name of Contributor or Contributor in full

YOUNG REPUBLICAN NATIONAL FEDERATION

Full Name, mailing address and ZIP code

Republican National Committee
310 First St., S.E., Washington, D. C. 20003

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date **\$ 46,758.20**

Date (month,
day, year)

Amount of each
receipt this period

4/15/77

6,416.67

4/29/77

8,401.74

6/2/77

1,437.59

6/30/77

7,354.67

6/2/77

5987.08

6/23/77

17,160.45

Full Name, mailing address and ZIP code

Young Republican National Convention, Inc.
P.O. Box 3893
Memphis, Tennessee 38103

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date **\$ 1,963.00**

Date (month,
day, year)

Amount of each
receipt this period

5/9/77

1,963.00

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ 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

☐ 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

☐ 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

☐ Check if Contributor is self-employed

Aggregate Year-to-date **\$**

Subtotal of receipts this page (optional)

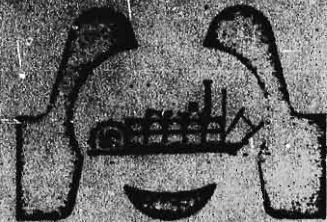
\$

Total this period (last page this line number only)

\$ 48,721.20

FEDERAL ELECTION
COMMISSION

'77 OCT 10 AM 9:56



YOUNG REPUBLICAN
NATIONAL CONVENTION '77

P.O. BOX 3893, MEMPHIS, TN 38103

October 5, 1977

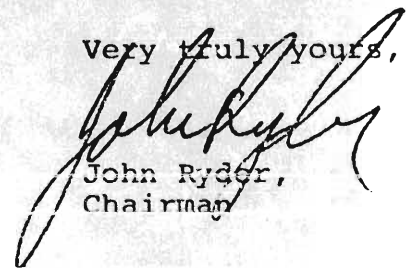
Mr. Orlando Potter
Staff Director
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: 3SV1/77-133

Dear Mr. Potter:

This will acknowledge receipt of your letter of September 27, 1977. Our initial impression is that the Commission must be in error. The item noted in your letter appears to have been a reimbursement for postage. However, we are referring this matter to counsel for proper evaluation and response. We will submit a response within such time as you may require.

Very truly yours,


John Ryder,
Chairman

JOHN RYDER, CHAIRMAN
JIM PATE, VICE CHAIRMAN
DIRECTORS: VICKI DUNN, JIMMY EXUM, JANE MARTIN, CINDY MURPHY, ART SULLIVAN, DON...

0040180253
77030603940



FEDERAL ELECTION COMMISSION

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

September 27, 1977

Young Republican National
Convention Inc.
Post Office Box 3893
Memphis, Tennessee 38103

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting candidates and committees to comply with the Federal Election Campaign Act, as amended. Our review of the receipts reported by other political committees indicates that your organization may have contributed in excess of \$1,000 to a committee supporting Federal candidates.

The Act defines "political committee" to mean any committee, club, association, or other group of persons which receives contributions or makes expenditures in excess of \$1,000 during a calendar year for the purpose of influencing a Federal election (2 U.S.C. 431(d)). Additionally, 2 U.S.C. 431(f)(3) states that transfers of funds to political committees which support Federal candidates are considered "expenditures". It would appear that your organization may qualify as a "political committee" under the Act.

Enclosed are relevant informational materials with regard to the Federal Election Campaign Act, including the appropriate forms for registration and reporting by political committees. Please examine these materials and, if you agree that your organization is a political committee, please submit a Statement of Organization on FEC FORM 1 within ten days of receipt of this letter. In addition, your committee will be required to file disclosure reports in accordance with the provisions of 2 U.S.C. 434 on FEC FORM 3. If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement within ten days which would clarify this matter for the public record.

If you have any questions concerning this matter, please do not hesitate to contact David Greevy (300)424-9530, our Reports Analyst assigned to you. Our local telephone number is 523-4048.

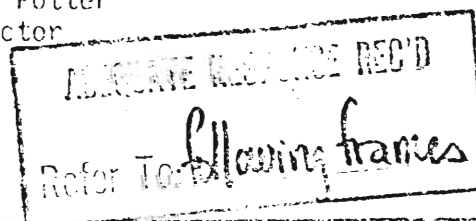
Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director



Enclosure
Return Receipt
Requested: Certified



10/12
10/25

60040180256
77030603937

Please notify the Commission within ten (10) days of receipt of this letter of the determination made on this matter. If you have any questions, please do not hesitate to contact David Greevy (800)-424-9530, our Reports Analyst assigned to you. Our local number is 523-4048.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Enclosure
Certified Mail:
Return Receipt Requested

77030603938
00401802057

Schedule A

July 1976
Federal Election Commission
1325 H Street, N.W.
Washington, D.C. 20543

**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)

Page 1 of 1

LINE NUMBER 16A

(Use separate schedule for each numbered line)

Name of Candidate or Committee in full

YOUNG REPUBLICAN NATIONAL FEDERATION

Full Name, mailing address and ZIP code

**Republican National Committee
310 First St., S.E., Washington, D. C. 20003**

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date **\$ 46,758.20**

Date (month,
day, year)

Amount of each
receipt this period

4/13/77

6,416.67

4/29/77

8,401.74

6/2/77

1,437.59

6/30/77

7,354.67

6/2/77

5987.08

6/23/77

17,160.45

Full Name, mailing address and ZIP code

**Young Republican National Convention, Inc.
P.O. Box 3893
Memphis, Tennessee 38103**

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date **\$ 1,963.00**

Date (month,
day, year)

Amount of each
receipt this period

5/5/77

1,963.00

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ 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

☐ 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

☐ 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

☐ 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 only) **\$ 48,721.20**

FEDERAL ELECTION
COMMISSION

'77 OCT 10 AM 9:56



YOUNG REPUBLICAN
NATIONAL CONVENTION '77

P.O. BOX 3883, MEMPHIS, TN 38103

October 5, 1977

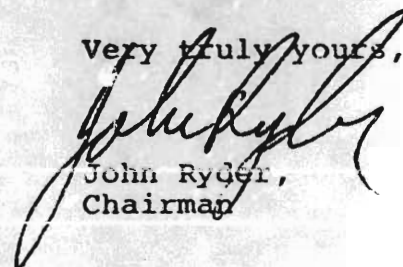
Mr. Orlando Potter
Staff Director
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: 3SV1/77-133

Dear Mr. Potter:

This will acknowledge receipt of your letter of September 27, 1977. Our initial impression is that the Commission must be in error. The item noted in your letter appears to have been a reimbursement for postage. However, we are referring this matter to counsel for proper evaluation and response. We will submit a response within such time as you may require.

Very truly yours,


John Ryder,
Chairman

ART SULLIVAN DONOR

CINDY MURPHY

JANE MARTIN

JIMMY EXUM

VICKI DUNN

DIRECTORS

JIM PATE, VICE CHAIRMAN

JOHN RYDER, CHAIRMAN

0040180259
77030603940

Telecon:

From: Dug Greevy

Date: October 11, 1977

Committee: Young Republican National Federation
also Young Republican National Convention, Inc.

Paul Mannafoord of the YRNF called this day on several different matters.

1. Surface violation letter sent to the two committees above. The Convention committee transferred about \$1,900 to YRNF. P.M. stated that this was for reimbursement of funds spent by YRNF for postage. I stated that both committees should notify FEC of this by letter, and that YRNF should amend their report to show the receipt on Line 17, Schedule A, as reimbursement for postage.

2. RFAI on amended October 10 Quarterly, 1976, itemizing source of cash on hand, January 1, 1976. Mannafoord stated that he submitted this information. What he submitted was receipts in the amount of about \$25,000. I told him that the committee was mistaken in the amount of cash on hand for which the sources had to be accounted. They evidently took the amount of cash on hand June 1, 1976, as that amount for which they had to make an accounting. The amount of cash on hand January 1, 1976, was, after a \$5,000 adjustment made by Steven Ford, approximately \$37,000. P.M. stated that they would supply the information as soon as possible, although he is afraid that their computer service may have destroyed the tapes of the '75 information. He stated that a letter would be forthcoming stating that they were compiling the information.

3. P.M. stated that the new report(Q3) will show a \$5,000 transfer in from the Convention committee. He stated that YRNF contracts out the right of a subordinate committee to sponsor the bi-annual national convention. He stated that the Memphis committee is the sponsoring committee this year, and that they have organized a separate account to handle the administrative and host details for the Convention. The contract price is \$5,000, and this is what will be shown on the Q3. He stated that their attorneys have determined that the Convention committee is not a political committee under the ACT, and therefore they should not have to register with FEC. Furthermore, he stated that the \$5,000 was received exclusively as registration fees for individuals attending the convention, and that the money would be used by YRNF for only administrative matters. I told him that probably the easiest way to provide FEC with proper information would be for the Convention committee to provide YRNF with information concerning those individuals who provided these registration fees. In this way, YRNF could report same to FEC. I also informed him of contributor limitations regarding this transaction, and of the fact that the contributors should be informed that the money has been transferred to YRNF, a registered political committee.

4. P.M. stated that in January, 1978, YRNF will sponsor the Young Republican Leadership Conference, which is a conference held to teach Young Republicans different methods of campaigning, and of different areas of elections and election laws. He stated that a separate account will be used for this conference, and he wondered about the reporting requirements. I stated that this was an area which should be dealt with by OGC, and I advised him that he should, if he desired a definitive

answer on the matter, request an advisory opinion from OGC. I stated first that a determination may have to be made as to whether or not the Conference would constitute a political committee under the ACT, as it may be possible to construe the Conference as having an influence on Federal elections. He stated that much of the funding for the Conference is provided by corporations, and he wondered what could be done with any residual funds which the Conference might have. I stated once again that OGC could provide him with a definitive answer on these questions, and he stated that he would be submitting an AOR shortly.

00040180261

VORYS, SATER, SEYMOUR AND PEASE

ATTORNEYS AT LAW

52 EAST GAY STREET
POST OFFICE BOX 1008
COLUMBUS, OHIO 43216

OH-484-8400
CABLE VORYSATER

WRITER'S DIRECT DIAL NUMBER

015-454

October 11, 1977

Mr. David Greevy
Federal Election Commission
1325 K. Street, N.W.
Washington, D. C. 20463

Dear Mr. Greevy:

Pursuant to our conversation today, YRNF is compiling a list of registrants to its 1977 convention in Memphis that will total the amount paid to the YRNF by Young Republican National Convention, Inc., the sponsoring committee.

YRNF shall submit the list as soon as it is complete and such submission, as I understand your comments, will fulfill YRNF's reporting responsibility. If this is not correct, please notify me immediately.

Sincerely,

Paul Manafort
Paul Manafort

PM/pr

cc: Mr. Roger Stone

00040180262
77030603633

ARTHUR J. VORYS 1856-1933
LOWRY F. SATER 1887-1938
AUGUSTUS T. SEYMOUR 1873-1926
EDWARD L. PEASE 1873-1924

OCT 14 AM 10:59

WASHINGTON
SUITE 200 SOUTH
1000 K STREET N.W.
200 456-6120

VORVYS, SATER, SEYMOUR AND

ATTORNEYS AT LAW

52 EAST GAY STREET
POST OFFICE BOX 1008
COLUMBUS, OHIO 43216

614-464-6400
CABLE VORVYSATER

WRITER'S DIRECT DIAL NUMBER

614-464

October 11, 1977

THOMAS I. VORVYS 1866-1933
JOHN F. SATER 1867-1938
AUGUSTUS Y. SEYMOUR 1873-1926
EDWARD L. PEASE 1873-1924

RECEIVED
77 OCT 14 AM 8:59
WASHINGTON
1200 N. STREET, N.W.
200-200-2010

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

RE: 3SVI/77-132

Dear Mr. Porter:

As a result of a discussion with Mr. Greevy, I am formally notifying you that the \$1,963.00 received from the Young Republican National Convention, Inc. reflected in the YRNF's July 10 Quarterly Report represents reimbursement of money advanced by the YRNF to cover postage costs of the convention committee.

YRNF will be filing an amended Schedule A, reflecting the \$1,963.00 in the proper place, Line 17.

I trust that this will satisfy your inquiry.

Sincerely,

Paul Manafort
Paul Manafort

PM/pr

cc: Mr. Roger Stone

30040180263
77030603042

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

LINE NUMBER 26

(Use separate schedule 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 of This For
YOUNG REPUBLICAN NATIONAL FEDERATION				
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Memphis Young Republican National Convention, Inc.	6/10/77	333.00		
P. O. Box 3893	6/10/77	2,470.26		
Memphis, Tennessee 38103	6/10/77	2,172.85	-0-	4,976.11
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)	\$	\$	\$
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)		\$	\$	\$ 4,976.11

Carry outstanding balance only, to appropriate line of summary.

80040180264



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20543

THIS IS THE BEGINNING OF MUR # 1044

Date Filmed 2/2/80 Camera No. --- 2

Cameraman SPE

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