



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1305



91912101013

PS Form 3811, Jan. 1978

1305

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

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

☐ Show to whom and date delivered.....

☐ Show to whom, date and address of delivery.....

☐ RESTRICTED DELIVERY
Show to whom and date delivered.....

☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery.....

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Scott Mackenzie

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	948722	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☒ Authorized agent

4. DATE OF DELIVERY
FEB 23 1981

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

POSTMARK
FEB 15 1981
SOUTH BEND, IN

RECEIVED
INITIALS

☆ GPO : 1978-258-848

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 20, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Scott Mackenzie
Treasurer
Reagan for President
General Election Committee
310 First Street, S.E.
Washington, D.C.

Re: MUR 1305

Dear Mr. Mackenzie:

This is to advise you that the Commission has considered a referral made to the Office of General Counsel by the Reports Analysis Division concerning an apparent violation of 11 C.F.R. § 9003.4 and thus of 26 U.S.C. § 9012(b) by your committee as a result of its failure to repay in full in a timely fashion \$470,000 in loans received from the Reagan Bush Committee Compliance Fund. The Commission has decided to take no further action and to close the file in this matter.

If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel

31010234517



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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RETURN RECEIPT REQUESTED

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If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel

3171331519
A&S
2/17/81

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Reagan for President General) MUR 1305
Election Committee (aka Reagan)
Bush Committee))

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 18, 1981, the Commission decided by a vote of 4-0 to take the following actions regarding MUR 1305:

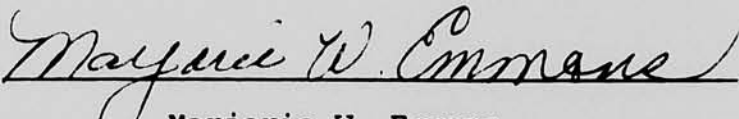
1. Take no further action in this matter.
2. Close the file.
3. Send the letter as submitted with the First General Counsel's Report dated February 13, 1981.

Voting for this determination were Commissioners Aikens, McGarry, Reiche, and Thomson.

Attest:

Date

2/18/81


Marjorie W. Emmons
Secretary of the Commission

Received in Office of the Commission Secretary: 2-13-81, 10:34
Circulated on 48 hour vote basis: 2-13-81, 2:00

February 13, 1981

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1305

Please have the attached First GC Report distributed to the Commission on a 48 hour tally basis. Thank you.

31710231520

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

81 FEB 13 AIO: 34

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
OF OGC TO THE COMMISSION 2-13-81

MUR NO. 1305
STAFF MEMBER
Anne Weissenborn

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

RESPONDENT'S NAME: Reagan for President General Election Committee
(aka Reagan Bush Committee)

RELEVANT STATUTE AND REGULATIONS: 26 U.S.C. § 9003(b)(2)
26 U.S.C. § 9012(b)(1)
11 C.F.R. § 9003.3(a)(2)(i)(E)
11 C.F.R. § 9003.4(b)(2)

INTERNAL REPORTS CHECKED: Monthly Reports filed by Respondent

SUMMARY OF ALLEGATIONS

This matter was generated as the result of information compiled by the Reports Analysis Division during the ordinary course of review of reports submitted by the Reagan for President General Election Committee ("the Committee"). In its referral to this Office the Reports Analysis Division found that the Committee had apparently violated 11 C.F.R. § 9003.4(b)(2) by failing to repay loans received from the Reagan Bush Committee Compliance Fund ("Compliance Fund") within 15 days of receipt of Federal funds pursuant to 26 U.S.C. § 9005. (See Attachment 1).

FACTUAL AND LEGAL ANALYSIS

Between June 6 and July 24, 1980, the Committee received from the Compliance Fund a total of \$470,000 in loans. On July 24, 1980, the Committee received \$29,400,000 in federal funds pursuant to 26 U.S.C. § 9005. On July 25, 1980, it repaid \$10,000 to the Compliance Fund, while on August 8, 1980, the fifteenth day after its receipt of federal funds, the Committee made a second payment of \$360,000. On August 14, 1980, it repaid the outstanding balance of \$100,000 owed the Compliance Fund.

26 U.S.C. § 9003(b)(2) states that in order to be eligible to receive public funds under 26 U.S.C. § 9006, a candidate of a major party must certify that he or she has not and will not accept contributions to defray qualified campaign expenses unless the amount received from the Presidential Election Campaign Fund

does not equal the candidate's entitlement. 26 U.S.C. § 9012 (b)(1) states that "(i)t shall be unlawful for an eligible candidate of a major party in a presidential election or any of his authorized committees knowingly and willfully to accept any contribution to defray qualified campaign expenses...."

Former 11 C.F.R. § 141.3 permitted acceptance by a candidate of contributions made to a legal and accounting compliance fund which could be used to defray costs of complying with the requirements of Title 2 and of Chapter 95 of Title 26, United States Code. On May 15, 1980, the Commission published for comment amendments to its regulations governing the public financing of Presidential general elections; these amendments were transmitted to Congress on June 27, 1980, and became effective on September 5, 1980. Included in these amendments, as published on May 15, was 11 C.F.R. § 9003.3(a)(1) which provided for privately financed legal and accounting compliance funds in the same manner as did former 11 C.F.R. § 141.3. New provisions, now found at 11 C.F.R. § 9003.3 (a)(2)(i)(E) and 11 C.F.R. § 9003.4(b)(2), permitted candidates to defray general election-related expenses incurred prior to the candidate's expenditure report period by borrowing from their legal and accounting compliance funds. If such candidates later received federal funds for use in the general election campaign, he or she **would be** required to repay the loans received from legal and accounting compliance funds within 15 days of receipt of such federal funds.

As the dates cited above indicate, the regulations permitting receipt of loans from legal and accounting compliance funds were not in effect at the time the Committee obtained such loans from the Compliance Fund. On the other hand, it appears that the Committee relied upon the proposed regulations when it obtained the loans in question. Given its partial repayment of the loans on the fifteenth day after its receipt of federal funds, it also appears that the Committee was aware of the need for timely repayment as required by the proposed regulations. The Committee did not, however, make total repayment until six days after the period within which repayment would have had to have been made if the proposed regulations had been in effect.

1/ The Explanation and Justification for 11 C.F.R. § 9003(a)(2)(i)(E) states that the use of contributions to make such loans from the legal and accounting compliance fund is permissible "because only a temporary borrowing is involved; the contributions must be restored in accordance with 11 C.F.R. § 9003.4."

Recommendation

- Attachments: Reports Analysis Referral with attachments
Letter to respondent

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING ATTACHMENT 1

REPORTS ANALYSIS REFERRAL SHEET

DATE OCTOBER 3, 1980 ANALYST Mike Thompson
TO: Office of General Counsel TEAM CHIEF Irene Allen
THROUGH: STAFF DIRECTOR OK COMPLIANCE REVIEW FL/PS
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS DH

CANDIDATE/COMMITTEE: Reagan/Bush Committee (General Election Committee) C00129007

TREASURER: Ms. Bay Buchanan

ADDRESS: 901 South Highland St.
Arlington, Va. 22204

AFFILIATE(S): - Reagan for President Committee (PCC Primary Committee) (C00108308)
- Reagan/Bush Committee - Compliance Fund (C00128771)

ALLEGATION(S): CITE: ATTACHMENT(S)

Failure to repay loans received from the
Compliance Fund within 15 days of receipt of Federal Funds.

(Please See Attachment 2)

DATE INITIATED:

MANNER IN WHICH REVIEW WAS INITIATED:

☒ Normal Review

☐ Other:

☐ Special Project:

ATTACHMENT

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

PERIOD COVERED FROM 6/1/80 **TO** 8/31/80

TOTAL RECEIPTS \$ 30,060,468 **TOTAL EXPENDITURES** \$ 3,205,307

CASH ON HAND \$ 26,855,161 **DEBTS** \$ 154,324 (Owed TO the committee)

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

None regarding this transaction

REASON(S) FOR REFERRAL:

ATTACHMENT

Violation of 11 C.F.R. 9003.4(b)(2) (Requirement to repay loans received from Compliance Fund within 15 days of receipt of Federal Funds.)

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

None to date

OTHER RELEVANT INFORMATION:

ATTACHMENT

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

None

ATTACHMENT 2

Reagan/Bush Committee - General Election Committee

On June 6, 1980, the General Election Committee received the first of several loans from the Compliance Fund. The purpose of these loans was to incur qualified campaign expenditures for the general election prior to receipt of Federal funds under 11 C.F.R. 9005.

On July 24, 1980, the General Fund received \$29,440,000 in Federal funds under 11 C.F.R. 9005. Subsequently, the committee began repaying the loans from the Compliance fund. However, the last payment amounting to \$100,000 was not paid until August 14, 1980; beyond the 15 day limit required under 11 C.F.R. 9003.4(b)(2).

The last day for payment, not including July 24, 1980, should have been August 8, 1980. The Reagan/Bush Committee, by not paying the last of the installments due to the Compliance Fund until after the required date of payment, appears to have violated the Regulations.

The following copies of pertinent portions of the committee's reports will demonstrate this assertion:

<u>Document:</u>	<u>Attachment:</u>
Schedule A-P for Line 20a (Loans Received); July 20 Monthly Report (Amended)	A
Schedule A-P for Line 16 (Federal Funds Received); August 20 Monthly Report	B
Schedule A-P for Line 20a (Loans Received); August 20 Monthly Report	C
Schedule B-P for Line 27a (Loan Repayments); August 20 Monthly Report	D
Schedule B-P for Line 27a (Loan Repayments); September 20 Monthly Report	E

3 1 7 1 0 2 3 4 5 7
FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (79-80)

DATE 10CT80
PAGE 1

PRESIDENTIAL

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
REAGAN FOR PRESIDENT GENERAL ELECTION COMMITTEE 1980 (AKA REAGAN BUSH COMMITTEE)								
								ID #C00129007
1980	STATEMENT OF ORGANIZATION					29MAY80		3 80FEC/109/0134
	STATEMENT OF ORGANIZATION - AMENDMENT					23JUN80		2 80FEC/109/3868
	STATEMENT OF ORGANIZATION - AMENDMENT					7AUG80		2 80FEC/111/4141
	STATEMENT OF ORGANIZATION - AMENDMENT					30AUG80		4 80FEC/113/1980
	STATEMENT OF ORGANIZATION - AMENDMENT					11SEP80		4 80FEC/113/2188
	STATEMENT OF ORGANIZATION - AMENDMENT					29SEP80		4 80FEC/113/5421
	JUNE MONTHLY		0		0	1MAY80 - 31MAY80		3 80FEC/109/3868
	JULY MONTHLY		200,000		68,356	1JUN80 - 30JUN80		6 80FEC/111/2188
	JULY MONTHLY - AMENDMENT		200,000		172,955	1JUN80 - 30JUN80		9 80FEC/113/1268
	AUGUST MONTHLY		29,710,000		335,288	1JUL80 - 31JUL80		37 80FEC/113/1268
	SEPTEMBER MONTHLY		150,468		2,697,063	1AUG80 - 30AUG80		213 80FEC/113/2534
	TOTAL		0 30,060,468		0 3,205,306			287 TOTAL PAGES

ITEMIZED RECEIPTS
(Contributions, Transfers, Contributions and
Federal Funds, Other Income, Loans, Refunds)

Supporting Lines 16, 17a, 18a, 18b, 19a, 20a, 21a and 22a
of FEC Form 3P

Page 1 of 1 for
LINE NUMBER 20a

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

RAD ATTACHMENT A

NOTE: Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

Name of Candidate or Committee in Full
REAGAN FOR PRESIDENT GENERAL ELECTION COMMITTEE

A. Full Name, Mailing Address and ZIP Code

REAGAN FOR PRESIDENT COMPLIANCE FUND
901 S. Highland St.
ARLINGTON, VA 22204

COMMITTEE TRANSFERS

Date (month,
day, year)

Amount of each
receipt this period

6/6/80
6/11/80

\$10,000.00
\$ 40,000.00

Principal Place of Business

Occupation

Aggregate Year-To-Date ... ▶ \$

B. Full Name, Mailing Address and ZIP Code

REAGAN FOR PRESIDENT COMPLIANCE FUND
901 S. HIGHLAND ST
ARLINGTON, VA 22204

COMMITTEE TRANSFERS

Date (month,
day, year)

Amount of each
receipt this period

6/17/80
6/18/80

\$100,000.00
10,000.00

Principal Place of Business

Occupation

Aggregate Year-To-Date ... ▶ \$

C. Full Name, Mailing Address and ZIP Code

REAGAN FOR PRESIDENT COMPLIANCE FUND
901 S HIGHLAND ST
ARLINGTON, VA 22204

COMMITTEE TRANSFERS

Date (month,
day, year)

Amount of each
receipt this period

6/26/80

\$40,000.00

Principal Place of Business

Occupation

Aggregate Year-To-Date ... ▶ \$

D. Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Aggregate Year-To-Date ... ▶ \$

Date (month,
day, year)

Amount of each
receipt this period

RAD NOTE: This is the amended report disclosing the loans on the
proper line number. The original report disclosed the loans as
direct transfers on line 18a.

Date (month,
day, year)

Amount of each
receipt this period

F. Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

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)

\$200,000.00

734337

NOTE: Any information received herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any other purpose.

Name of Candidate or Committee in Full

REAGAN BUSH COMMITTEE

1. Full Name, Mailing Address and ZIP Code

**U.S. Treasury
Washington, D.C. 20006**

(Federal Funds)

Date (month,
day, year)

Amount of each
receipt at this date

7/24/80 29,440,000.

Principal Place of Business

Occupation

Aggregate Year-To-Date . . . > \$ **N/A**

2. Full Name, Mailing Address and ZIP Code

Date (month,
day, year)

Amount of each
receipt at this date

Principal Place of Business

Occupation

Aggregate Year-To-Date . . . > \$

3. Full Name, Mailing Address and ZIP Code

Date (month,
day, year)

Amount of each
receipt at this date

Principal Place of Business

Occupation

Aggregate Year-To-Date . . . > \$

4. Full Name, Mailing Address and ZIP Code

Date (month,
day, year)

Amount of each
receipt at this date

Principal Place of Business

Occupation

Aggregate Year-To-Date . . . > \$

5. Full Name, Mailing Address and ZIP Code

Date (month,
day, year)

Amount of each
receipt at this date

Principal Place of Business

Occupation

Aggregate Year-To-Date . . . > \$

6. Full Name, Mailing Address and ZIP Code

Date (month,
day, year)

Amount of each
receipt at this date

Principal Place of Business

Occupation

Aggregate Year-To-Date . . . > \$

SUBTOTAL of Receipts This Page (optional)

\$

TOTAL This Period (last page this line number only)

\$29,440.

3 19 20 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70

RAD ATTACHMENT C

NOTE: Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

Name of Candidate or Committee in Full
REAGAN BUSH COMMITTEE

A. Full Name, Mailing Address and ZIP Code	LOANS	Date (month, day, year)	Amount of each receipt this period
Reagan For President Compliance Fund		7/15/80	75,000.00
901 S. Highland Street		7/15/80	10,000.00
Arlington, Va. 22204		7/21/80	10,000.00
Principal Place of Business	Occupation	7/24/80	50,000.00
Aggregate Year-To-Date . . . ▶ \$			

B. Full Name, Mailing Address and ZIP Code	LOANS	Date (month, day, year)	Amount of each receipt this period
Reagan for President Compliance Fund		7/15/80	5,000.00
901 S. Highland Street		7/1/80	5,000.00
Arlington, Va. 22204		7/29/80	10,000.00
Principal Place of Business	Occupation	7/15/80	5,000.00
Aggregate Year-To-Date . . . ▶ \$			

C. Full Name, Mailing Address and ZIP Code	LOANS	Date (month, day, year)	Amount of each receipt this period
Reagan for President Compliance Fund		7/24/80	100,000.00
901 S. Highland Street			
Arlington, Va. 22204			
Principal Place of Business	Occupation		
Aggregate Year-To-Date . . . ▶ \$			

D. Full Name, Mailing Address and ZIP Code		Date (month, day, year)	Amount of each receipt this period
Principal Place of Business	Occupation		
Aggregate Year-To-Date . . . ▶ \$			

E. Full Name, Mailing Address and ZIP Code		Date (month, day, year)	Amount of each receipt this period
Principal Place of Business	Occupation		
Aggregate Year-To-Date . . . ▶ \$			

F. Full Name, Mailing Address and ZIP Code		Date (month, day, year)	Amount of each receipt this period
Principal Place of Business	Occupation		
Aggregate Year-To-Date . . . ▶ \$			

SUBTOTAL of Receipts This Page (optional) \$ 270,000.00

TOTAL This Period (last page this line number only) \$ 270,000.00

919010031151321

NOTE: Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

Name of Candidate or Committee in Full

REAGAN BUSH COMMITTEE

A. Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Regan for President Compliance Fund 901 S. Highland St. Arlington, Va. 22204	Repayment of Loans	7/25/80 7/28/80	5,000.00 5,000.00
B. Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
C. Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
D. Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
E. Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
F. Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
G. Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
H. Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
SUBTOTAL of Expenditures This Page (optional)			\$10,000.00
TOTAL This Period (last page this line number only)			\$10,000.00

3180103131151399

ITEMIZED EXPENDITURES
 (Operations, Exempt Fundraising, Legal and Accounting,
 Transfers Out, Contributions In-Kind, Loans, Loan
 Repayments and Refunds Made)

Supporting Lines 24a, 25a, 26a, 26b, and 27a
 of FEC Form 3P

(Use separate schedule for
 each numbered line)

RAD ATTACHMENT E

NOTE: Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

Name of Candidate or Committee in Full

REAGAN BUSH COMMITTEE

A. Full Name, Mailing Address and ZIP Code

Reagan for President Compliance Fund
 901 S. Highland St.
 Arlington, VA 22204

Particulars of Expenditure

Repayment of Loans

Date (month,
 day, year)

8/8/80
 8/8/80
 8/14/80

Amount of each ex-
 penditure this period

70,000.00
 290,000.00
 100,000.00

B. Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
 day, year)

Amount of each ex-
 penditure this period

C. Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
 day, year)

Amount of each ex-
 penditure this period

D. Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
 day, year)

Amount of each ex-
 penditure this period

E. Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
 day, year)

Amount of each ex-
 penditure this period

F. Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
 day, year)

Amount of each ex-
 penditure this period

G. Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
 day, year)

Amount of each ex-
 penditure this period

H. Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
 day, year)

Amount of each ex-
 penditure this period

SUBTOTAL of Expenditures This Page (optional)

\$ 460,000.00

TOTAL of all Expenditures (see instructions)

\$ 460,000.00

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



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Scott Mackenzie
Treasurer
Reagan for President
General Election Committee
310 First Street, S.E.
Washington, D.C.

Re: MUR 1305

Dear Mr. Mackenzie:

This is to advise you that the Commission has considered a referral made to the Office of General Counsel by the Reports Analysis Division concerning an apparent violation of 11 C.F.R. § 9003.4 and thus of 26 U.S.C. § 9012(b) by your committee as a result of its failure to repay in full in a timely fashion \$470,000 in loans received from the Reagan Bush Committee Compliance Fund. The Commission has decided to take no further action and to close the file in this matter.

If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel

31010234633

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE October 3, 1980 ANALYST Mike Thompson
TO: Office of General Counsel TEAM CHIEF Irene Allen
THROUGH: STAFF DIRECTOR AK COMPLIANCE REVIEW EL/PS
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS DH

CANDIDATE/COMMITTEE: Reagan/Bush Committee (General Election Committee) C00129007
TREASURER: Ms. Bay Buchanan
ADDRESS: 901 South Highland St.
Arlington, Va. 22204
AFFILIATE(S):
- Reagan for President Committee (PCC Primary Committee) (C00108308)
- Reagan/Bush Committee - Compliance Fund (C00128771)
ALLEGATION(S): CITE: 11 C.F.R. 9003.4(b)(2) ATTACHMENT(S)
Failure to repay loans received from the Compliance Fund within 15 days of receipt of Federal Funds. (Please See Attachment 2)
DATE INITIATED:
MANNER IN WHICH REVIEW WAS INITIATED:
☐ Normal Review ☐ Other: ATTACHMENT
☐ Special Project:

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

PERIOD COVERED FROM 6/1/80 **TO** 8/31/80

TOTAL RECEIPTS \$ 30,060,468 **TOTAL EXPENDITURES** \$ 3,205,307

CASH ON HAND \$ 26,855,161 **DEBTS** \$ 154,324 (Owed TO the committee)

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

None regarding this transaction

REASON(S) FOR REFERRAL:

ATTACHMENT

Violation of 11 C.F.R. 9003.4(b)(2) (Requirement to repay loans received from Compliance Fund within 15 days of receipt of Federal Funds.)

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

None to date

OTHER RELEVANT INFORMATION:

ATTACHMENT

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

None

3 1 0 1 0 2 3 1 6 3 3
FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (79-80)

DATE 10CT80
PAGE 1

PRESIDENTIAL

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
REAGAN FOR PRESIDENT GENERAL ELECTION COMMITTEE 1980 (AKA REAGAN BUSH COMMITTEE)								
								ID #C00129007
1980	STATEMENT OF ORGANIZATION					29MAY80		3 80FEC/109/0136
	STATEMENT OF ORGANIZATION - AMENDMENT					23JUN80		2 80FEC/109/3868
	STATEMENT OF ORGANIZATION - AMENDMENT					7AUG80		2 80FEC/111/4141
	STATEMENT OF ORGANIZATION - AMENDMENT					30AUG80		4 80FEC/113/1980
	STATEMENT OF ORGANIZATION - AMENDMENT					11SEP80		4 80FEC/113/2188
	STATEMENT OF ORGANIZATION - AMENDMENT					29SEP80		4 80FEC/113/5421
	JUNE MONTHLY		0		0	1MAY80 -31MAY80		3 80FEC/109/3857
	JULY MONTHLY		200,000		68,356	1JUN80 -30JUN80		6 80FEC/111/277
	JULY MONTHLY - AMENDMENT		200,000		172,955	1JUN80 -30JUN80		9 80FEC/113/130
	AUGUST MONTHLY		29,710,000		335,288	1JUL80 -31JUL80		37 80FEC/113/1268
	SEPTEMBER MONTHLY		150,468		2,697,063	1AUG80 -30AUG80		213 80FEC/113/2534
	TOTAL		0 30,060,468		0 3,205,306			287 TOTAL PAGES

ATTACHMENT 2

Reagan/Bush Committee - General Election Committee

On June 6, 1980, the General Election Committee received the first of several loans from the Compliance Fund. The purpose of these loans was to incur qualified campaign expenditures for the general election prior to receipt of Federal funds under 11 C.F.R. 9005.

On July 24, 1980, the General Fund received \$29,440,000 in Federal funds under 11 C.F.R. 9005. Subsequently, the committee began repaying the loans from the Compliance fund. However, the last payment amounting to \$100,000 was not paid until August 14, 1980; beyond the 15 day limit required under 11 C.F.R. 9003.4(b)(2).

The last day for payment, not including July 24, 1980, should have been August 8, 1980. The Reagan/Bush Committee, by not paying the last of the installments due to the Compliance Fund until after the required date of payment, appears to have violated the Regulations.

The following copies of pertinent portions of the committee's reports will demonstrate this assertion:

<u>Document:</u>	<u>Attachment:</u>
Schedule A-P for Line 20a (Loans Received); July 20 Monthly Report (Amended)	A
Schedule A-P for Line 16 (Federal Funds Received); August 20 Monthly Report	B
Schedule A-P for Line 20a (Loans Received); August 20 Monthly Report	C
Schedule B-P for Line 27a (Loan Repayments); August 20 Monthly Report	D
Schedule B-P for Line 27a (Loan Repayments); September 20 Monthly Report	E

ITEMIZED RECEIPTS
(Contributions, Transfers, Contributions In-Kind,
Federal Funds, Other Income, Loans, Refunds)

Supporting Lines 16, 17a, 18a, 18b, 19a, 20a, 21a and 22a
of FEC Form 3P

Page 1 of for
LINE NUMBER 20a

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

RAD ATTACHMENT A

NOTE: Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

Name of Candidate or Committee in Full
REAGAN FOR PRESIDENT GENERAL ELECTION COMMITTEE

A. Full Name, Mailing Address and ZIP Code		Date (month, day, year)	Amount of each receipt this period
REAGAN FOR PRESIDENT COMPLIANCE FUND COMMITTEE TRANSFERS 901 S. Highland St. ARLINGTON, VA 22204		6/6/80	\$10,000.00
		6/11/80	\$ 40,000.00
Principal Place of Business	Occupation		
Aggregate Year-To-Date . . . ▶ \$			
B. Full Name, Mailing Address and ZIP Code		Date (month, day, year)	Amount of each receipt this period
REAGAN FOR PRESIDENT COMPLIANCE FUND COMMITTEE TRANSFERS 901 S. HIGHLAND ST ARLINGTON, VA 22204		6/17/80	\$100,000.00
		6/18/80	10,000.00
Principal Place of Business	Occupation		
Aggregate Year-To-Date . . . ▶ \$			
C. Full Name, Mailing Address and ZIP Code		Date (month, day, year)	Amount of each receipt this period
REAGAN FOR PRESIDENT COMPLIANCE FUND COMMITTEE TRANSFERS 901 S HIGHLAND ST ARLINGTON, VA 22204		6/26/80	\$40,000.00
Principal Place of Business	Occupation		
Aggregate Year-To-Date . . . ▶ \$			
D. Full Name, Mailing Address and ZIP Code		Date (month, day, year)	Amount of each receipt this period
Principal Place of Business	Occupation		
Aggregate Year-To-Date . . . ▶ \$			
RAD NOTE: This is the amended report disclosing the loans on the proper line number. The original report disclosed the loans as direct transfers on line 18a.		Date (month, day, year)	Amount of each receipt this period
F. Full Name, Mailing Address and ZIP Code		Date (month, day, year)	Amount of each receipt this period
Principal Place of Business	Occupation		
Aggregate Year-To-Date . . . ▶ \$			
SUBTOTAL of Receipts This Page (optional)			\$
TOTAL This Period (last page this line number only)			\$200,000.00

310301313163097

Name of Candidate or Committee in Full

REAGAN BUSH COMMITTEE

3. Home Address and ZIP Code

U.S. Treasury
Washington, D.C. 20006

(Federal Funds)

Date (month,
day, year)

Amount of test
material

7/24/80 29,440,000.

[illegible]

Conclusion

Aggregate Year-To-Date... > S N/A

3. Full Name, Mailing Address and ZIP Code

Date (month, day, year)

Amount of
Interest

Principal Place of Business

Occupation

Aggregate Year-To-Date . . . ➤ \$

C. Full Name, Mailing Address and ZIP Code

Date (month,
day, year)

Amount of oil
used in 1954

Page 2 of 2

Conclusion

Approved: _____

1. The first step is to identify the problem or question that needs to be answered.

2000 (1999-2000)
2001 (2000-2001)

1. 2. 3. 4. 5. 6. 7. 8. 9. 10. 11. 12. 13. 14. 15. 16. 17. 18. 19. 20. 21. 22. 23. 24. 25. 26. 27. 28. 29. 30. 31. 32. 33. 34. 35. 36. 37. 38. 39. 40. 41. 42. 43. 44. 45. 46. 47. 48. 49. 50. 51. 52. 53. 54. 55. 56. 57. 58. 59. 60. 61. 62. 63. 64. 65. 66. 67. 68. 69. 70. 71. 72. 73. 74. 75. 76. 77. 78. 79. 80. 81. 82. 83. 84. 85. 86. 87. 88. 89. 90. 91. 92. 93. 94. 95. 96. 97. 98. 99. 100. 101. 102. 103. 104. 105. 106. 107. 108. 109. 110. 111. 112. 113. 114. 115. 116. 117. 118. 119. 120. 121. 122. 123. 124. 125. 126. 127. 128. 129. 130. 131. 132. 133. 134. 135. 136. 137. 138. 139. 140. 141. 142. 143. 144. 145. 146. 147. 148. 149. 150. 151. 152. 153. 154. 155. 156. 157. 158. 159. 160. 161. 162. 163. 164. 165. 166. 167. 168. 169. 170. 171. 172. 173. 174. 175. 176. 177. 178. 179. 180. 181. 182. 183. 184. 185. 186. 187. 188. 189. 190. 191. 192. 193. 194. 195. 196. 197. 198. 199. 200. 201. 202. 203. 204. 205. 206. 207. 208. 209. 210. 211. 212. 213. 214. 215. 216. 217. 218. 219. 220. 221. 222. 223. 224. 225. 226. 227. 228. 229. 230. 231. 232. 233. 234. 235. 236. 237. 238. 239. 240. 241. 242. 243. 244. 245. 246. 247. 248. 249. 250. 251. 252. 253. 254. 255. 256. 257. 258. 259. 260. 261. 262. 263. 264. 265. 266. 267. 268. 269. 270. 271. 272. 273. 274. 275. 276. 277. 278. 279. 280. 281. 282. 283. 284. 285. 286. 287. 288. 289. 290. 291. 292. 293. 294. 295. 296. 297. 298. 299. 300. 301. 302. 303. 304. 305. 306. 307. 308. 309. 310. 311. 312. 313. 314. 315. 316. 317. 318. 319. 320. 321. 322. 323. 324. 325. 326. 327. 328. 329. 330. 331. 332. 333. 334. 335. 336. 337. 338. 339. 340. 341. 342. 343. 344. 345. 346. 347. 348. 349. 350. 351. 352. 353. 354. 355. 356. 357. 358. 359. 360. 361. 362. 363. 364. 365. 366. 367. 368. 369. 370. 371. 372. 373. 374. 375. 376. 377. 378. 379. 380. 381. 382. 383. 384. 385. 386. 387. 388. 389. 390. 391. 392. 393. 394. 395. 396. 397. 398. 399. 400. 401. 402. 403. 404. 405. 406. 407. 408. 409. 410. 411. 412. 413. 414. 415. 416. 417. 418. 419. 420. 421. 422. 423. 424. 425. 426. 427. 428. 429. 430. 431. 432. 433. 434. 435. 436. 437. 438. 439. 440. 441. 442. 443. 444. 445. 446. 447. 448. 449. 450. 451. 452. 453. 454. 455. 456. 457. 458. 459. 460. 461. 462. 463. 464. 465. 466. 467. 468. 469. 470. 471. 472. 473. 474. 475. 476. 477. 478. 479. 480. 481. 482. 483. 484. 485. 486. 487. 488. 489. 490. 491. 492. 493. 494. 495. 496. 497. 498. 499. 500. 501. 502. 503. 504. 505. 506. 507. 508. 509. 510. 511. 512. 513. 514. 515. 516. 517. 518. 519. 520. 521. 522. 523. 524. 525. 526. 527. 528. 529. 530. 531. 532. 533. 534. 535. 536. 537. 538. 539. 540. 541. 542. 543. 544. 545. 546. 547. 548. 549. 550. 551. 552. 553. 554. 555. 556. 557. 558. 559. 560. 561. 562. 563. 564. 565. 566. 567. 568. 569. 570. 571. 572. 573. 574. 575. 576. 577. 578. 579. 580. 581. 582. 583. 584. 585. 586. 587. 588. 589. 590. 591. 592. 593. 594. 595. 596. 597. 598. 599. 600. 601. 602. 603. 604. 605. 606. 607. 608. 609. 610. 611. 612. 613. 614. 615. 616. 617. 618. 619. 620. 621. 622. 623. 624. 625. 626. 627. 628. 629. 630. 631. 632. 633. 634. 635. 636. 637. 638. 639. 640. 641. 642. 643. 644. 645. 646. 647. 648. 649. 650. 651. 652. 653. 654. 655. 656. 657. 658. 659. 660. 661. 662. 663. 664. 665. 666. 667. 668. 669. 670. 671. 672. 673. 674. 675. 676. 677. 678. 679. 680. 681. 682. 683. 684. 685. 686. 687. 688. 689. 690. 691. 692. 693. 694. 695. 696. 697. 698. 699. 700. 701. 702. 703. 704. 705. 706. 707. 708. 709. 710. 711. 712. 713. 714. 715. 716. 717. 718. 719. 720. 721. 722. 723. 724. 725. 726. 727. 728. 729. 730. 731. 732. 733. 734. 735. 736. 737. 738. 739. 740. 741. 742. 743. 744. 745. 746. 747. 748. 749. 750. 751. 752. 753. 754. 755. 756. 757. 758. 759. 760. 761. 762. 763. 764. 765. 766. 767. 768. 769. 770. 771. 772. 773. 774. 775. 776. 777. 778. 779. 780. 781. 782. 783. 784. 785. 786. 787. 788. 789. 790. 791. 792. 793. 794. 795. 796. 797. 798. 799. 800. 801. 802. 803. 804. 805. 806. 807. 808. 809. 810. 811. 812. 813. 814. 815. 816. 817. 818. 819. 820. 821. 822. 823. 824. 825. 826. 827. 828. 829. 830. 831. 832. 833. 834. 835. 836. 837. 838. 839. 840. 84

Principal Place of Business

Creation

Aggregate Year-To-Date... > S

E. Full Name, Mailing Address and ZIP Code

Date (month
day, year)

Amount of a
received

Principal Place of Business

Occupation

Aggregate Year-To-Date... ▶ S

F. Full Name, Mailing Address and ZIP Code

Date (month,
day, year)

Amount of
received

Principal Place of Business

Occupation

Aggregate Year-To-Date . . . ▶ S

SUBTOTAL of Effects This Page (optional)

3

TOTAL This Period (last page this line number only)

\$29,440.

ITEMIZED RECEIPTS

(Contributions, Transfers, Contributions In-Kind,
Federal Funds, Other Income, Loans, Funds)

Supporting Lines 16, 17a, 18a, 18b, 19a, 20a, 21a and 22a
of FEC Form 3P

LINE NUMBER 208

(Use separate schedule for each
numbered line)

RAD ATTACHMENT C

NOTE: Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

Name of Candidate or Committee in Full
REAGAN BUSH COMMITTEE

| | | | | |
|---|------------|--------------|---|--|
| A. Full Name, Mailing Address and ZIP Code
Reagan For President Compliance Fund
901 S. Highland Street
Arlington, Va. 22204 | | LOANS | Date (month, day, year)
7/15/80
7/15/80
7/21/80
7/24/80 | Amount of each receipt this period
75,000.00
10,000.00
10,000.00
50,000.00 |
| Principal Place of Business | Occupation | | | |
| Aggregate Year-To-Date . . . ▶ \$ | | | | |
| B. Full Name, Mailing Address and ZIP Code
Reagan for President Compliance Fund
901 S. Highland Street
Arlington, Va. 22204 | | LOANS | Date (month, day, year)
7/15/80
7/1/80
7/29/80
7/15/80 | Amount of each receipt this period
5,000.00
5,000.00
10,000.00
5,000.00 |
| Principal Place of Business | Occupation | | | |
| Aggregate Year-To-Date . . . ▶ \$ | | | | |
| C. Full Name, Mailing Address and ZIP Code
Reagan for President Compliance Fund
901 S. Highland Street
Arlington, Va. 22204 | | LOANS | Date (month, day, year)
7/24/80 | Amount of each receipt this period
100,000.00 |
| Principal Place of Business | Occupation | | | |
| Aggregate Year-To-Date . . . ▶ \$ | | | | |
| D. Full Name, Mailing Address and ZIP Code | | | Date (month, day, year) | Amount of each receipt this period |
| Principal Place of Business | Occupation | | | |
| Aggregate Year-To-Date . . . ▶ \$ | | | | |
| E. Full Name, Mailing Address and ZIP Code | | | Date (month, day, year) | Amount of each receipt this period |
| Principal Place of Business | Occupation | | | |
| Aggregate Year-To-Date . . . ▶ \$ | | | | |
| F. Full Name, Mailing Address and ZIP Code | | | Date (month, day, year) | Amount of each receipt this period |
| Principal Place of Business | Occupation | | | |
| Aggregate Year-To-Date . . . ▶ \$ | | | | |
| SUBTOTAL of Receipts This Page (optional) | | | | \$270,000.00 |
| TOTAL This Period (last page this line number only) | | | | \$270,000.00 |

34003PF31271

ITEMIZED EXPENDITURES
(Operating, Exempt Fundraising, Legal and Accounting,
Transfers Out, Contributions In-Kind, Loans, Loan
Repayments and Refunds Made)

Supporting Lines 24a, 25a, 26a, 26b, and 27a
of FEC Form 3P

LINE NUMBER 27a

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

RAD ATTACHMENT D

NOTE: Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

Name of Candidate or Committee in Full

REAGAN BUSH COMMITTEE

| A. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
|--|----------------------------|-------------------------|--|
| Regan for President Compliance Fund
901 S. Highland St.
Arlington, Va. 22204 | Repayment of Loans | 7/25/80
7/28/80 | 5,000.00
5,000.00 |
| B. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| C. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| D. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| E. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| F. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| G. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| H. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| SUBTOTAL of Expenditures This Page (optional) | | | \$10,000.00 |
| TOTAL This Period (last page this line number only) | | | \$10,000.00 |

ITEMIZED EXPENDITURES
(Operating, Exempt Fundraising, Legal and Accounting,
Transfers Out, Contributions In-Kind, Loans, Loan
Repayments and Refunds Made)
Supporting Lines 24a, 25a, 26a, 26b, and 27a
of FEC Form 3P

Page 1 of 1
 LINE NUMBER 27a

(Use separate schedule for each numbered line)

RAD ATTACHMENT E

NOTE: Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

Name of Candidate or Committee in Full

REAGAN BUSH COMMITTEE

| A. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
|--|----------------------------|-----------------------------|--|
| Reagan for President Compliance Fund
901 S. Highland St.
Arlington, VA 22204 | Repayment of Loans | 8/8/80
8/8/80
8/14/80 | 70,000.00
290,000.00
100,000.00 |
| B. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| C. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| D. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| E. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| F. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| G. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| H. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |

SUBTOTAL of Expenditures This Page (optional) \$ 440,000.00

TOTAL This Period (sum of all lines numbered on v) \$ 440,000.00

1-1790138-10110143



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1305

Date Filmed 3-25-81 Camera No. --- 2

Cameraman LPC

31710234613