



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1619

Date Filmed 3/28/84 Camera No. --- 2

Cameraman JRL

FEDERAL ELECTION COMMISSION

routing slips, duplicates, 12 Day Report, Comments
to 12 Day Report

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act; 5 U.S.C. Section 552(b):

- | | |
|--|---|
| ☐ (1) Classified Information | ☐ (6) Personal privacy |
| ☐ (2) Internal rules and practices | ☐ (7) Investigatory files |
| ☐ (3) Exempted by other statute | ☐ (8) Banking Information |
| ☐ (4) Trade secrets and commercial or financial information | ☐ (9) Well Information (geographic or geophysical) |
| ☒ (5) Internal Documents | |

Signed Beverly B. Kramer

date 3/13/84

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Jesse Jackson for President) MUR 1619
Samuel L. Foggie, Sr., Treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 12, 1984, the Commission decided by a vote of 5-0 to take the following actions in MUR 1619:

1. Find no reason to believe that the Jesse Jackson for President Committee and its treasurer, Mr. Samuel L. Foggie, Sr., violated 11 C.F.R. § 9034.7(b)(2)-(5).
2. Close the file in MUR 1619.
3. Approve and send the letters as attached to the First General Counsel's Report dated March 7, 1984.

Commissioners Aikens, Elliott, McDonald, McGarry and Reiche voted affirmatively in this matter; Commissioner Harris did not cast a vote.

Attest:

3-12-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

3-7-84, 4:19
3-8-84, 11:00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 13, 1984

Mr. C. Lester Kinsolving
1517 Beulah Road
Vienna, Virginia 22180

Re: MUR 1619

Dear Mr. Kinsolving:

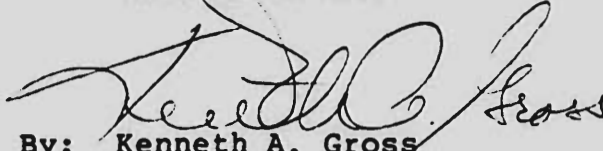
The Federal Election Commission has reviewed the allegations of your complaint dated January 20, 1984, and determined that on the basis of the information provided in your complaint and information provided by the Respondent there is no reason to believe that a violation of Chapters 95 and 96 of Title 26, U.S. Code or the Commission's attendant regulations has been committed.

Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
General Counsel's Report

34010452258



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 13, 1984

Mr. Ralph C. Thomas, III
1101 - 14th Street, N.W. #1000
Washington, D.C. 20005

Re: MUR 1619
Jesse Jackson for President
Samuel L. Foggie, Sr., Treasurer

Dear Mr. Thomas:

On January 26, 1984, the Commission notified your clients of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March 12, 1984, determined that on the basis of the information in the complaint and information provided by you there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

By:  Kenneth A. Gross
Associate General Counsel

640 0452939

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

RECEIVED
OFFICE OF THE
COMMISSIONER

First General Counsel's Report

84 MAR 7 P4:19

Date and Time of Transmittal
By OGC to the Commission 3/7/84-4:15

MUR # 1619
Date Complaint Received
by OGC 1/20/84
Date of Notification to
Respondent 1/26/84
Staff Member
Beverly Kramer

COMPLAINANT'S NAME: C. Lester Kinsolving
RESPONDENTS' NAMES: Jesse Jackson for President
Samuel L. Foggie, Sr., Treasurer
RELEVANT STATUTE: 11 C.F.R. § 9034.7(b)(2)-(5)
INTERNAL REPORTS CHECKED: 1983 Year End Report
Agenda Document #84-29
FEDERAL AGENCIES CHECKED: None

SENSITIVE

SUMMARY OF ALLEGATIONS

On January 20, 1984, Mr. C. Lester Kinsolving filed a complaint with the Commission. The complainant, based on personal knowledge, information and belief, alleges that the Jesse Jackson for President Committee ("the Committee") 1/ violated 11 C.F.R. § 9034.7(b)(5) by failing to reimburse the appropriate government entity for use of a government aircraft that included candidate Jesse Jackson and at least one member of the Committee (Tom Porter) on a return trip from Damascus, Syria, which was allegedly campaign-related. In addition, the complainant alleges that the Committee violated 11 C.F.R.

1/ The Jesse Jackson for President Committee is the principal campaign committee for Rev. Jesse Jackson's campaign for the Democratic Party's presidential nomination in 1984. As such, the Committee has received, pursuant to Commission certification, federal matching payments. See Agenda Document #84-29.

§ 9034.7(b)(2)-(4) by failing to prepare an itinerary for the trip, a list of all passengers on the trip, and a designation of which passengers were or were not campaign-related. 2/

FACTUAL AND LEGAL ANALYSIS

I. The facts presented in the complaint and in response to the complaint

The complaint states that when candidate Jesse Jackson traveled to Damascus, Syria in late December 1983, on a trip that was made, inter alia, for diplomatic and humanitarian purposes, Mr. Tom Porter accompanied the candidate. 3/ The complaint claims that Mr. Porter is a functionary on Mr. Jackson's campaign staff and that Mr. Porter has no experience or qualifications as a diplomat or as a participant in humanitarian missions. Thus, the complaint alleges that Mr. Porter's only function on the trip was campaign-related.

The complaint also states that the return trip from Damascus, Syria was made on an aircraft owned and operated by the U.S. Government. The complaint asserts that because Mr. Porter was only on the trip for campaign-related purposes, the candidate's authorized committee, The Jesse Jackson for President Committee, should reimburse the government in accordance with 11 C.F.R. § 9034.7(b)(5). The complainant also cites 11 C.F.R. § 9034.7(b)(2), (3), and (4) as being applicable to the matter at issue.

2/ A copy of the complaint was circulated to the Commission on January 25, 1984.

3/ The trip and concomitant negotiations resulted in the release of Lt. Robert O. Goodman, Jr., a United States citizen who was being held prisoner by the Syrians.

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Respondents Jesse Jackson for President Committee and its treasurer, Mr. Samuel L. Foggie, Sr., responded through counsel on February 15, 1984. The response denies the allegations of the complainant.

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The response explains that although Mr. Tom Porter is on the campaign staff of the Jesse Jackson for President Committee, he was asked to accompany Mr. Jackson to Syria because of his qualifications and experience relating to humanitarian causes and because of his Middle East expertise. According to the response, Mr. Porter has been involved in the civil/human rights field for almost 30 years, has traveled to the Middle East on several occasions and in 1979 was part of a fact-finding delegation to the Middle East which was made up of ministers, educators and other civil rights and human rights advocates. In addition, the response states that Mr. Porter has made humanitarian donations to schools in Lebanon and is considered by Reverend Jackson to have unique expertise in Middle East affairs, particularly in the Arab world. Furthermore, the response explains that as a former Vice-President of the Congress on Racial Equality and also as the former Executive Director of the Martin Luther King, Jr. Center for Non-violence and Social Change, Mr. Porter has extensive experience in civil and human rights negotiation.

With respect to Mr. Porter's role in the trip to Damascus, Syria, the response states that Mr. Porter attended all of the briefings associated with the humanitarian plea for the American

prisoner's release and was used in the capacity of a staff liaison with the Syrian Embassy primarily because of his experience in dealing with embassies in the Middle East as well as other countries. According to the response, Mr. Porter did not perform any campaign-related duties while on the trip to Syria and was not requested to be part of the delegation to Syria for campaign-related purposes.

Respondents submit that because Mr. Porter's participation in the trip to Syria did not involve "campaign-related travel" within the meaning of 11 C.F.R. § 9034.7(b)(5), the Jesse Jackson for President Committee is not required to reimburse the government for Mr. Porter's travel from Syria to Washington, D.C. Furthermore, the respondents maintain that because the trip to Syria involved no campaign-related activity, the complainant's allegations in regard to 11 C.F.R. § 9034.7(b)(2)-(4) are moot.

II. The Law Applicable

Section 9034.7 of the Commission's regulations concerns the allocation of expenses incurred for travel relating to the campaign of a candidate who receives or is expecting to receive federal matching funds pursuant to 26 U.S.C. § 9031 et seq. The regulations provide that if a trip by that candidate or any other individual includes only campaign-related stops, the total cost of the trip is a qualified campaign expense within the meaning of

3404043297:

11 C.F.R. § 9032.9, payable by the candidate's authorized committee and subject to the expenditure limitations of 11 C.F.R. § 9035.1. If a trip by a candidate or any other individual includes campaign and non-campaign related stops, that portion of the trip allocable to campaign activity is a qualified campaign expense and a reportable expenditure subject to the limitations of 11 C.F.R. § 9035.1. For purposes of determining what portion of a trip is campaign-related and therefore allocable to the candidate's expenditure limit, the Commission's regulations at 11 C.F.R. § 9034.7(b)(3) and (4) require that the authorized committee of the candidate prepare and make available for Commission inspection an itinerary of the trip, a list of all passengers on a trip by government conveyance and a designation of which passengers were or were not campaign-related.

In addition, 11 C.F.R. § 9034.7(b)(5) requires that if any individual, including a candidate, uses government conveyance or accommodations paid for by a government entity for campaign-related travel, the candidate's authorized committee shall reimburse the government entity. 4/

III. Application of the law to the facts

The threshold issue in this case is whether the trip to Damascus, Syria by candidate Jesse Jackson and Mr. Tom Porter

4/ This requirement is necessary to prevent the free use of government conveyance or accommodations for campaign-related activity. Such free use would amount to government subsidization of a candidate's campaign and would defeat the purpose of expenditure limitations.

involved campaign-related activity within the meaning of 11 C.F.R. § 9034.7.

The only evidence provided by the complainant that the trip was campaign-related is the statement that Mr. Porter, who accompanied the candidate on the trip, was a functionary of the campaign staff and had no diplomatic qualifications. As respondents have refuted that statement by providing ample evidence of Mr. Porter's diplomatic and humanitarian qualifications, as well as, evidence of his participation in the negotiations for the American prisoner's release, there does not appear to be any evidence remaining that the trip was campaign-related. 5/

In view of the foregoing, the Office of General Counsel recommends that the Commission find no reason to believe that the Jesse Jackson for President Committee and its treasurer, Mr. Samuel L. Foggie, Sr., violated 11 C.F.R. § 9034.7(b)(2)-(5).

Recommendations

1. Find no reason to believe that the Jesse Jackson for President Committee and its treasurer, Mr. Samuel L. Foggie, Sr., violated 11 C.F.R. § 9034.7(b)(2)-(5).

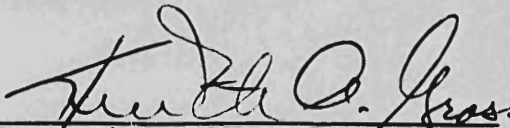
5/ The Office of General Counsel has reviewed the Committee's 1983 Year End report and has found no other information to indicate that the Committee incurred expenditures in connection with the trip to Syria.

94010432971

2. Close the file in MUR 1619.
3. Approve and send the attached letters.

Charles N. Steele
General Counsel

March 1, 1984
Date

By: 
Kenneth A. Gross
Associate General Counsel

Attachments
Response to Complaint
Letters

8401043270

62-1663

MUR 1619
Kinsolving

BEFORE THE FEDERAL
ELECTION COMMISSION
WASHINGTON, D.C.

TO: The General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

In re: MUR 1619

RESPONSE

COMES NOW the Respondent, JESSE JACKSON FOR PRESIDENT,*
of 2100 M Street, N.W., Suite 316, Washington, D.C. 20036,
to file a RESPONSE in accordance with the Regulations of the
Federal Election Commission, under Section 111.6 of those
Regulations, to the Complaint filed by Mr. C. Lester Kinsolving.

Said complaint alleges that when Candidate Jesse L. Jackson
traveled to Damascus, Syria in late December, 1983 on a humani-
tarian mission one Tom Porter accompanied the Candidate. The
Complaint further claims that Tom Porter is a member of the
Candidate's campaign staff and that he has no experience or
qualifications as a diplomat or in humanitarian missions.
Thus, the complaint alleges, Mr. Porter's only function in
accompanying the Candidate on the trip was to further the
political candidacy of Reverend Jackson.

Mr. Kinsolving also argues in his complaint that the return
trip from Syria was made on government aircraft. Thus, he
claims, since Mr. Porter was only on the trip for campaign-
related purposes, the principal campaign committee should
reimburse the government in accordance with 11 C.F.R. 9034.7.

*All references to the Respondent as well as the Jesse Jackson For
President Committee include Treasurer Samuel L. Foggie, Sr.

The Complainant also cites 11 C.F.R. 9034.7(2), (3), (4), as being relevant to the issue.

The Respondent hereby denies the allegations of the Complainant for the following reasons:

1. Although Mr. Tom Porter is on the campaign staff of Jesse Jackson For President, he was requested by the Candidate to accompany him to Syria for his qualifications and experience in humanitarian causes and his Middle East expertise.

2. Mr. Porter has been involved in the civil/human rights field for almost thirty (30) years. He has traveled to the Middle East on several occasions and in 1979 was part of a fact-finding delegation to the Middle East which was made up of ministers, educators and other civil rights and human rights advocates.

3. Mr. Porter has made humanitarian donations to schools in Lebanon and is considered by Reverend Jackson to have unique expertise in Middle East affairs, particularly in the Arab world.

4. Mr. Porter is a former Vice-President of the Congress on Racial Equality and is also the former Executive Director of the Martin Luther King, Jr. Center For Non-Violence and Social Change. He has extensive experience in civil and human rights negotiation.

5. During the trip to Syria Mr. Porter attended all the briefings associated with the humanitarian plea for the American

prisoner's release and was used in the capacity of a staff liaison with the Syrian Embassy primarily because of his experience in dealing with embassies in the Middle East as well as other countries.

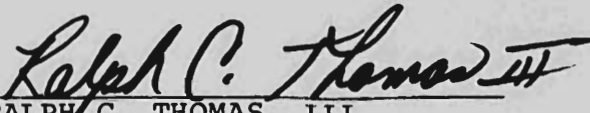
6. Mr. Porter did not perform any campaign-related duties while on the trip to Syria and, as stated previously, was not requested to be a part of the delegation to Syria for campaign-related purposes.

7. Since Mr. Porter's role in the journey to Syria was not intended to , nor did it, further the political candidacy of the Reverend Jesse L. Jackson, it is submitted that Mr. Porter's participation in the humanitarian mission of mercy did not involve "campaign-related travel" within the meaning of Section 9034.7(b)(5) of the Regulations of the Federal Election Commission. Thus, the authorized committee for the Candidate is not required to reimburse the government for Mr. Porter's travel from Syria to Washington, D.C.

8. Furthermore, because the trip to Syria involved no campaign-related activity, Mr. Kinsolving's allegations in regard to 11 C.F.R. 9034.7 (3), regarding an itinerary, becomes and is a moot issue.

WHEREFORE, the Respondent respectfully requests that the Federal Election Commission dismiss the Complaint filed with no action taken.

Respectfully submitted,


RALPH C. THOMAS, III
Attorney for the Respondent
1101 - 14th Street, N.W. #1000
Washington, D.C. 20005
202/347-7444

I HAVE READ THE FOREGOING RESPONSE AND HEREBY STATE UNDER OATH THAT ALL PARAGRAPHS AS THEY RELATE TO ME ARE TRUE AND CORRECT.

_____*
TOM PORTER

Subscribed and sworn before me this ____ day of February, 1984 in Washington, D.C.

*Mr. Porter is temporarily unavailable. Filing is made on this day for purposes of making the required filing deadline. A notarized page will be submitted within 24 hours of this date.

STATEMENT OF DESIGNATION OF COUNSEL

Re: MUR 1619

NAME OF COUNSEL: RALPH C. THOMAS, III

ADDRESS: 1101 -14th Street, N.W.
Suite 1000
Washington, D.C. 20005

TELEPHONE: 202/347-7444

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

840 045203
2-6-84
Date

[Signature]
Signature

NAME: Samuel L. Foggie, Sr.

ADDRESS: 1850 K Street, N.W., Suite 290
Washington, D.C. 20036

HOME PHONE 301/292-9488

BUSINESS PHONE: 202/388-4392



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 26, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jesse Jackson for President
Committee
Samuel L. Foggie, Sr., Treasurer
2100 M Street, N.W., Suite 316
Washington, D.C. 20036

Re: MUR 1619

Dear Mr. Foggie:

This letter is to notify you that on January 20, 1984, the Federal Election Commission received a complaint which alleges that the Jesse Jackson for President Committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1619. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against the committee and you, as treasurer, in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you and your committee intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Page -2-

Letter to Jesse Jackson for
President Committee
Samuel L. Foggie, Sr., Treasurer

If you have any questions, please contact Beverly Kramer,
the staff member assigned to this matter at (202) 523-4057. For
your information, we have attached a brief description of the
Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

8401045293

CERTIFIED

PS Form 3811, July 1982

• SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered
☐ Show to whom, date, and address of delivery ..
☐ RESTRICTED DELIVERY
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$

2. ARTICLE ADDRESSED TO:
REV. JESSE L. JACKSON
6845 S. CONSTANCE AVENUE
CHICAGO, ILLINOIS 60649

4. TYPE OF SERVICE: ARTICLE NUMBER
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD 9440403
☐ EXPRESS MAIL
(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized Agent
DATE OF DELIVERY 1 Feb 84
POSTMARK (may be on reverse side)
6. ADDRESSEE'S ADDRESS (only if requested)

7. UNABLE TO DELIVER BECAUSE: 7a. EMPLOYEE'S INITIALS

MPK 1619 - Kramer (1/26/84) GPO: 1982-370-563

nt

PS Form 3811, July 1982

• SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered
☐ Show to whom, date, and address of delivery ..
☐ RESTRICTED DELIVERY
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$

2. ARTICLE ADDRESSED TO: JESSE JACKSON FOR PRES.
SAMUEL L. FOGGIE, SR., TREASURER
2100 M STREET, NW, SUITE 316
WASHINGTON, DC 20036

4. TYPE OF SERVICE: ARTICLE NUMBER
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD 944045
☐ EXPRESS MAIL
(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized Agent
DATE OF DELIVERY 1-31-84
POSTMARK (may be on reverse side)
6. ADDRESSEE'S ADDRESS (only if requested)

7. UNABLE TO DELIVER BECAUSE: 7a. EMPLOYEE'S INITIALS

MPK 1619 - Kramer (1/26/84) GPO: 1982-370-563



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 24, 1984

Mr. C. Lester Kinsolving
1517 Beulah Road
Vienna, Virginia 22180

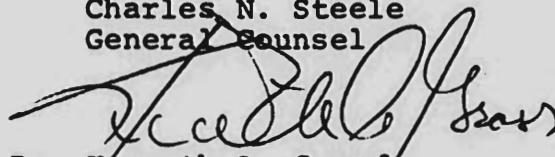
Dear Mr. Kinsolving:

This letter is to acknowledge receipt of your complaint which we received on January 20, 1984, against the Jesse Jackson for President Committee and Tom Potter which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedure for handling complaints. If you have any questions, please contact Cheryl Thomas at (202) 523-4073.

Sincerely,

Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

Enclosure



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

JANUARY 20, 1984 AT 2:44pm

DATE & TIME

RECEIPT FOR HAND DELIVERED DOCUMENTS

FROM: C. LESTER KINSOLVING

1517 BEULAH ROAD

VIENNA, VIRGINIA 22180

NUMBER OF DOCUMENTS: 1 COMPLAINT AGAINST

*Jesse Jackson for President Committee
Reagan for President Committee*

RECEIVED BY:

Jonathan Levin
JONATHAN LEVIN

0 1 0 4 5 2 3

6cc# 1454

BEFORE THE FEDERAL
ELECTION COMMISSION
WASHINGTON, D.C.

73 22:44

TO: The General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

C O M P L A I N T

COMES NOW C. Lester Kinsolving of 1517 Beulah Road, Vienna, Virginia, 22180 to file a COMPLAINT in accordance with the Regulations of the Federal Election Commission, under Section 111.4 of those Regulations.

Under Section (b) of the cited regulations, the said C. Lester Kinsolving provides the following information:

- (b) (1) Complainant: C. Lester Kinsolving
1517 Beulah Road
Vienna, Virginia 22180
Telephone No. (703) 759-9476
- (b) (2) The contents of this Complaint have been sworn to by the Complainant under oath.

Under Section (c) of the cited regulations, the said C. Lester Kinsolving provides the following information:

1. All statements in this sworn complaint and the attached sworn affidavit are made under oath with the complainant fully aware of the penalty of perjury.
2. The statements in this sworn complaint and accompanying affidavit are based upon personal knowledge, where indicated, and elsewhere upon information and belief.

Under Section (d) of the cited regulations, a sworn affidavit is attached to this sworn complaint setting forth knowledge and information that a government conveyance included at least one member of the "Jesse Jackson for President Committee" or similar supporting organization of the Jesse Jackson for President movement without reimbursement being provided for as required by the regulations. This trip involved the recent travel from Damascus, Syria by the presidential candidate Jackson as detailed in the accompanying affidavit.

Then the above-mentioned C. Lester Kinsolving did depose and swear under oath that the above Complaint and attached sworn affidavit represented his statements under oath for the purpose of filing a Complaint as required by the regulations of the Federal Election Commission.

January 20, 1984
date

C. Lester Kinsolving
C. Lester Kinsolving

C E R T I F I C A T E

The above-stated C. Lester Kinsolving personally appeared before me this 30th day of January, 1984, and, being deposed, swore to the above/under oath.
My Commission expires 11-22-85

Notary Public

BEFORE THE FEDERAL
ELECTION COMMISSION
WASHINGTON, D.C.

CITY OF WASHINGTON

DISTRICT OF COLUMBIA

77-22:44

SWORN AFFIDAVIT OF C. LESTER KINSOLVING OF VIRGINIA

I, C. Lester Kinsolving of 1517 Beulah Road, Vienna, Virginia, being duly deposed and sworn, make the following statements of my own volition and without any hope or promise of any reward whatsoever:

1. As a reporter accredited to the White House, I followed the recent trip to Syria of Presidential Candidate Jesse Jackson in considerable detail.

2. In the course of discussion of that trip, which was made, inter alia for diplomatic and humanitarian purposes, the names of persons accompanying Mr. Jackson were mentioned.

3. One of the persons mentioned, according to my best belief and information was Mr. Tom Porter. It is my understanding, according to my best information, that Mr. Porter is a functionary on Mr. Jackson's campaign staff.

4. Further, upon inquiry, it is my belief, acting on best information that Mr. Porter has no experience or qualifications as a diplomat or in humanitarian missions.

5. The White House spokesman, Mr. Larry Speakes, to my knowledge was unable to state definitively whether Mr. Porter will be billed for the equivalent value of the trip from Damascus, Syria when accompanying Mr. Jackson, in the role of a campaign functionary, to my best belief.

6. It is my best information that this trip was made in an aircraft owned and operated by the U.S. Government.

7. I know of my own knowledge that the regulations of the Federal Election Commission state, in part:

11 CFR 9034.7 (4) For trips by government conveyance or by charter, a list of all passengers on such trip, along with a designation of which passengers are and which are not campaign-related, shall be made available for Commission inspection.

11 CFR 9034.7 (5) If any individual, including a candidate, uses government conveyance or accommodations paid for by a government entity for campaign-related travel, the candidate's authorized committee shall pay the appropriate government entity an amount equal to: (i) The first class commercial air fare plus the cost of other services, in the case of travel to a city served by a regularly scheduled commercial service; or (ii) The commercial charter rate plus the cost of other services, in the case of travel to a city not served by a regularly scheduled commercial service.

11 CFR 9034.7 (2) For a trip which includes campaign-related and

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AFFIDAVIT OF C. LESTER KINSOLVING OF VIRGINIA, PAGE TWO

non-campaign related stops, that portion of the cost of the trip allocable to campaign activity shall be a qualified campaign expense and a reportable expenditure. Such portion shall be determined by calculating what the trip would have cost from the point of origin of the trip to the first campaign-related stop and from that stop through each subsequent campaign-related stop, back to the point of origin. If any campaign activity, other than incidental contacts, is conducted at a stop, that stop shall be considered campaign-related.

11 CFR 9034.7 (3) For each trip, an itinerary shall be prepared and such itinerary shall be made available for Commission inspection.

8. To the best of my information and belief, the only function of Mr. Porter, and possibly others accompanying Mr. Jackson, was to further the political candidacy of Mr. Jackson.

9. To the best of my knowledge, no itinerary has been prepared for the use of the Commission or for any other person's use concerning the list of all passengers accompanying Mr. Jackson and containing the other information required by the Commission's regulations.

Further sayeth the deponent not, but being deposed he did declare under oath that the foregoing statements were true to his personal knowledge or to his best belief and information.

Sworn this 20th day of January, 1984 in Washington, D.C.

C. Lester Kinsolving
C. Lester Kinsolving

CERTIFICATE

City of Washington
District of Columbia

The above-named C. Lester Kinsolving today personally appeared before me, was deposed and declared under oath the truth of the above affidavit this 20th day of January, 1984.

My commission expires 11-22-85.

Melba Hays
Notary Public



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1619

Date Filmed 3/28/84 Camera No. --- 2

Cameraman JRL