



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 190/198 File 1

7
8
0
4
0
0
1
0
7
9
3



FEDERAL ELECTION COMMISSION

Audit Report on the Ford Committee

Memo of July 18, 1977 from Costa /McKay/Stoltz to Oldaker

Memo of July 18, 1977 from Costa/McKay/Stoltz to Athy

Memo of July 14, 1977 from Oldaker to Costa

Memo of March 30, 1977 from Halter to Athy

Memo of April 29, 1977 from Spiegel to Athy

Memo from Steele, Spiegel and Athy to McKay, Costa and Stoltz

Memo of April 28, 1977 from Stoltz to Steele

Memo (undated) from Athy to Halter re March 30 Memo on
reasonableness of Ford advocate's travel

Memo of 3/2/77 from Fiske to legsl

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

date

FEC 9-21-77

CC # 840
MOL 190+
198

President Ford Committee

1628 L STREET, N.W. SUITE 250, WASHINGTON, D.C. 20036 (202) 457-6400

16 OCT 25 PM 2:26

763157

October 21, 1976

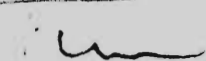
William Oldaker, Special Assistant
to the General Counsel
The Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

Dear Bill:

Enclosed is a copy of a letter from the Executive Assistant to Secretary Simon, Mr. John Gartland, with an attached memorandum from the Special Assistant to the Secretary for the Secret Service. As you will note, the Secret Service has stated that it will not disclose its portion of the costs of the Secretary's trips for security reasons. In addition, Mr. Gartland notes that the Secretary's staff is currently compiling the additional data with regard to aides who travel with the Secretary and such material will be forthcoming in the near future.

If you have any further questions, please feel free to contact me.

Sincerely,


T. Timothy Ryan
Assistant General Counsel

TTR:jr
Enclosures

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



OFFICE OF THE SECRETARY OF THE TREASURY
WASHINGTON, D.C. 20220

October 16, 1976

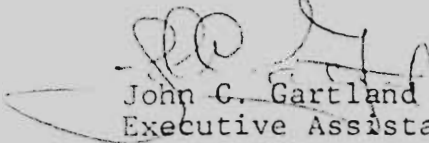
Dear Tim:

With regard to your request for total cost figures for several of Secretary Simon's trips, I am advised that the Secret Service will not disclose their portion of those costs, for reasons of security. A memorandum setting forth this policy is attached.

I might point out that we do not believe that the Secret Service's costs ought to be included in these calculations. If, however, the Federal Elections Commission were willing to make assurances that the information would not be released, I would be willing to make further attempts to obtain the information.

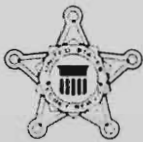
My staff is currently compiling the additional data you requested. I hope to send that to you shortly.

Sincerely,


John C. Gartland
Executive Assistant
to the Secretary

T. Timothy Ryan, Esq.
Assistant General Counsel
President Ford Committee
1828 L Street, N. W.
Suite 250
Washington, D. C. 20036

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



DEPARTMENT OF THE TREASURY

UNITED STATES SECRET SERVICE

WASHINGTON, D.C. 20223

OFFICE OF THE DIRECTOR

OCT 13 1976

MEMORANDUM FOR: John Gartland

FROM: William A. Hawthorne
Special Assistant to the Secretary
(Secret Service)

SUBJECT: FEC Request for Secret Service Cost
Data on Specific Trips of Secretary
Simon

Reference is made to your request for Secret Service cost data on four specific 1976 trips of Secretary Simon. I understand the information would ultimately be furnished the Federal Elections Commission, which is processing a citizen complaint.

It has long been the policy of the Secret Service not to disclose specific costs of protection to other than the Congress and its appropriations committees, since disclosure might jeopardize security. In view of the FEC request, I have discussed with Secret Service officials and legal counsel the application of this policy. They all believe the information should not be disclosed for reasons of security, and Treasury's Office of General Counsel concurs.

W. A. Hawthorne

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

President Ford Committee

1628 L STREET, N.W. WASHINGTON, D.C. 20036

DEC 1 1974

2:27

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

William Oldaker, Special Assistant
to the General Counsel
The Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

cc #690
REC'd
G.C. 10-12-76
4:10 P.M.

President Ford Committee

1808 L STREET, N.W. SUITE 250, WASHINGTON, D.C. 20036 (202) 497-5400

October 12, 1976

John G. Murphy, Jr., Esquire
General Counsel
The Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

RE: MUR 190 and 198 (76)

Dear Mr. Murphy:

This letter is in response to your correspondence dated September 24, 1976, which states that the Federal Election Commission (FEC) has determined that it has reason to believe a preliminary investigation should be conducted with regard to the allegations against The President Ford Committee (PFC) set forth in the above-referenced complaints.

I. STATEMENT

On August 10, 1976, you notified Robert C. Moot, Treasurer of the PFC during the primary period, that these complaints had been filed against the PFC and that the FEC was conducting a preliminary inquiry into the matter.

On September 3, 1976, the PFC responded to this notice. In our response we stated that the complaints should be immediately dismissed because (1) neither the Act nor the proposed regulations required the FEC to proceed on the basis of nothing more substantive than a newspaper article, and (2) assuming, arguendo, that the campaign laws required a preliminary inquiry into the matter, the relevant facts failed to provide any reason to believe that a violation of the Federal election laws had taken place. In addition, we noted that, save one trip by Secretary of Commerce, Elliott Richardson, all of the trips noted in the complaint involved travel which was primarily official in nature or travel undertaken on behalf of local Republican candidates or committees and were not scheduled as candidate-related activity on behalf of the Ford campaign. Further, we stated that all such PFC related activities, other than Secretary Richardson's

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

John G. Murphy, Jr., Esquire
October 12, 1976
Page Two

trip to Fort Wayne, Indiana, were of a "drop-in" or reception nature and were planned around the existing official schedule of the respective Cabinet member. Finally, we pointed out that PFC activities were scheduled only after the official schedule of the Cabinet member had been finalized.

In sum, our position with regard to the complaints remains unchanged. No additional facts have been alleged to substantiate a finding by the FEC of reason to believe that the President Ford Committee has violated the Act. However, in the spirit of cooperation and with complete confidence that the PFC's allocation formula and its implementation are in full compliance with the Act, the following pertinent material is submitted.

II. INFORMATION REQUESTED

A. Total Cost of Each Trip

Attached hereto as Exhibit A is a memorandum from the United States Department of Commerce setting forth the total costs incurred by that Department and the PFC for the four trips complained of which were taken by Secretary Richardson.

The total cost data for Secretary Simon's trips cannot be provided by the PFC at this time because of his recent foreign travel schedule and the fact that the United States Secret Service must review its files and provide a major portion of the requested data. Although we will attempt to provide this information as soon as possible, we believe that the material provided herewith fully justifies dismissal of these complaints.

B. Schedule of Activities

The schedule of activities which sets forth both the political and official business conducted in each city noted in the aforementioned complaints is submitted as Exhibits B through I. Secretary Simon's schedules are contained in Exhibits B through E. Secretary Richardson's schedules are contained in Exhibits F through I. The exhibits follow the chronological order set forth in the attachments to your September 24, 1976 letter. Those activities which were candidate related are so indicated. Official government activities and non-PFC political activities such as GOP fundraisers are noted along with the pertinent time and location of such activities.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

John G. Murphy, Jr., Esquire
October 12, 1976
Page Three

C. Reported Cost of Each Trip

The reported costs of each trip were set forth in our letter of September 3, 1976, and are also contained in the PFC's monthly Reports on file with the Commission. Specifically, the PFC has reported these expenditures as follows:

Trip No. 1

Secretary Simon's trip to Raleigh, N. C.
Paid 6/9/76, Treasurer of the U.S. \$ 17.44
June Report, Line 20, page 65

Trip No. 2

Secretary Simon's trip to Miss., Fla.,
Ala., Texas
Paid 6/9/76, Treasurer of the U.S. \$ 201.16
Paid 6/9/76, Treasurer of the U.S. 243.43
Both: June Report, Line 20, page 65

Trip No. 3

Secretary Simon's trip to New York
Paid 8/23/76, Colgan Airways, of which
\$29.01 applies to New York, \$22.11 to
Philadelphia \$ 51.12
Unitemized for September, page 39

Trip No. 4

Secretary Simon's trip to Oklahoma
Paid 6/10/76, Executive Jet Aviation, Inc. \$ 348.67
June Report, page 127

Trip No. 5

Secretary Richardson's trip to Fort Wayne,
Indiana
Paid 3/31/76, Federal Airways
April Report, Line 20, page 122 444.68

Trip No. 6

Secretary Richardson's trip to Los Angeles,
California
Paid 7/15/76, Department of Commerce \$ 57.00

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

7804001080

John G. Murphy, Jr., Esquire
October 12, 1976
Page Four

Trip No. 7

Secretary Richardson's trip to Detroit,
Michigan and Wisconsin
All costs charged to Republican Party
of Wisconsin and Congressman Cederberg

NA

Trip No. 8

Secretary Richardson's trip to Tennessee
and Alabama

Paid 7/15/76, Department of Commerce
July Report, Line 20, page 69

\$ 17.00

D. PFC Allocation Formula

A detailed explanation of the PFC allocation formula is contained in our memorandum dated February 23, 1976, set forth as Exhibit J. The memorandum was prepared by this office for the primary election based on the Act and the FEC's proposed regulations. It sets forth the allocation of campaign expenses for advocates, as well as the President, and notes that such expenses must be allocated on a reasonable basis where any individual, other than a candidate, conducts any campaign-related activity on a trip. An updated version of this memorandum was distributed for the general election campaign on September 23, 1976 (Exhibit K). Finally, in order to avoid even the appearance of unreasonable allocation of expenses during the general election, the Chairman of the PFC, James A. Baker, III, sent a memorandum (Exhibit L) to the Cabinet regarding their travel on behalf of the PFC. This memorandum is discussed at greater length in the conclusion.

III. SPECIFIC TRIP DATA

A. Raleigh, N. C. -- January 20, 1976

The purpose of Secretary Simon's trip to Raleigh, North Carolina, and Columbia, South Carolina, was to attend Chamber of Commerce events in each of those cities. The only PFC activity that occurred during that trip was a PFC reception held at the Royal Villa Inn in Raleigh from 7:10 p.m. to 7:40 p.m. All other activities of Secretary Simon were official in nature and the invitations for such activities were presented to the Secretary's office with no coordination by the PFC.

Secretary Simon was away from Washington for approximately eleven (11) hours with only thirty (30) minutes of this time being devoted to PFC related activity. Accordingly, pursuant to

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040010801

John G. Murphy, Jr., Esquire
October 12, 1976
Page Five

our formula, a reasonable allocation would be approximately 1/22 of the total expenses incurred. However, since the staff of the Secretary of the Treasury had initially allocated the costs for each of his trips, we abided by their higher allocation of \$17.44 and reimbursed that amount.

B. Mississippi, Florida, Alabama and Texas --
February 10-16, 1976

Secretary Simon's trip to Jackson, Mississippi was for a State GOP fundraiser which was paid for by the Mississippi Republican Party. The Secretary then traveled to Jacksonville, Florida for an official function where he spoke before the Jacksonville Board of Realtors. Prior to his speech in Jacksonville, Secretary Simon was engaged in PFC activities from 7:15 a.m. to 9:00 a.m. on February 11th. Thereafter, the Secretary traveled to Clearwater, Florida where he attended a Lincoln Day dinner. All costs incurred with regard to the Clearwater portion of the trip were paid by the Clearwater Republican Party. On February 12, 1976, Secretary Simon visited Orlando for a PFC luncheon. The same day he went to Miami for an editorial board meeting with the Miami Herald and a dinner for the Junior Achievement of Greater Miami. While in that area, he attended the Dade/Broward PFC reception. The Secretary then went to Palm Beach for a luncheon before the Economic Council of Palm Beach County and two PFC events. From the 13th to the 16th, the Secretary remained in West Palm Beach vacationing with friends. This time was not included in the time-spent allocation.

Thereafter, on February 16th, the Secretary left Palm Beach for Fort Worth, Texas where he attended the annual meeting of the Texas Bankers Association. While in Fort Worth, he attended a PFC luncheon from 11:45 a.m. until 1:30 p.m. The Secretary then left Fort Worth and proceeded to Mobile, Alabama for a Chamber of Commerce dinner. That afternoon, he also attended a PFC reception from 5:05 p.m. until 6:00 p.m. Based on our allocation formula, the PFC paid \$243.43 for candidate-related activity in Florida and \$201.16 for such activity in Texas and Alabama.

C. New York, New York -- March 30, 1976

Secretary Simon went to New York on March 30, 1976, for an official event before the University Club. From 4:00 p.m. until 5:50 p.m., the Secretary attended a PFC fundraising

7 3 0 4 0 0 1 0 8 0
OFFICE OF GENERAL COUNSEL

John G. Murphy, Jr., Esquire
October 12, 1976
Page Six

reception. Based on our allocation formula, the PFC reimbursed the Treasury Department \$29.01.

D. Tulsa and Oklahoma City, Oklahoma -- April 21-23, 1976

On the evening of April 21, 1976, Secretary Simon traveled to Tulsa, Oklahoma from Joliet, Illinois. The primary purpose of this trip was to give a speech before the Tulsa Chapter of the National Association of Business Economists. While in Tulsa, the Secretary attended a PFC luncheon from 11:25 a.m. to 2:00 p.m. on April 22nd. Thereafter, the Secretary gave another official speech at the University of Tulsa.

On April 23, 1976, the Secretary went to Oklahoma City for a Chamber of Commerce luncheon. While in Oklahoma City, the Secretary attended a candidate-related cocktail party on behalf of the PFC. For the Oklahoma trip, the PFC paid its allocable portion of the expenses which amounted to \$348.67.

E. Fort Wayne, Indiana -- April 8, 1976

The sole purpose for Secretary Richardson's April 8, 1976 trip to Fort Wayne, Indiana was to conduct candidate-related activities on behalf of the President. Accordingly, the PFC paid all expenses incurred in connection with this trip amounting to \$1,444.68.

F. Los Angeles, California -- May 11, 1976

The main purpose of Secretary Richardson's trip to Los Angeles on May 10, 1976, was to give a speech to the mid-year Refining Meeting of the American Petroleum Institute. While in Los Angeles, the Secretary attended a PFC business task force breakfast from 7:30 a.m. until 9:10 a.m. on May 11, 1976, and a State GOP fundraiser at noon. In addition, Secretary Richardson attended an editorial board meeting of the Los Angeles Times at the request of the PFC. Since only three out of the total thirty hours in Los Angeles were spent on PFC activity, the PFC reimbursed the Treasury one-tenth of the \$572.00 expense for the Secretary of \$57.00.

G. Detroit, Michigan -- May 14, 1976 OFFICE OF GENERAL COUNSEL

The main purpose of Secretary Richardson's trip to Michigan and Wisconsin was to raise funds for the Wisconsin State Party and to attend a fundraiser on behalf of Congressman Cederberg of Michigan. Enroute to Washington, the Secretary layed over in Detroit. While in Detroit, he attended a question and answer

John G. Murphy, Jr., Esquire
October 12, 1976
Page Seven

session and press conference in Detroit. The purpose of all travel by the Secretary during his Wisconsin and Michigan trip was to influence the election of Congressional candidates. Thus, the Congressional candidates and State GOP Committees paid for his travel expenses.

H. Memphis, Tennessee and Birmingham, Alabama --
April 28, 1976

Prior to attending a Chamber of Commerce dinner in Memphis which was a purely official event, the Secretary altered his schedule at the request of the PFC to attend certain PFC-related activities in Birmingham, Alabama. Based on a direct cost allocation, the PFC paid the \$17.00 difference between air fare from Washington, D. C. to Memphis and Washington, D. C. to Birmingham. There were no other costs related to the Birmingham event.

IV. CONCLUSION

The Federal Election Campaign Act of 1971, as amended, sets forth specific reporting requirements for candidates and political committees. In particular, Section 434 provides, inter alia, that political committees must report each expenditure in excess of \$100.00. As you are aware, an expenditure is defined as:

"a purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made for the purpose of

A. influencing for nomination for election of election of any person to federal office or to the office of President and Vice Presidential elector: or

B. influencing the results of a primary election held for the selection of delegates to a national nominating convention of a political party or for the expression of a preference for the nomination of persons for election to the office of President of the United States. . . ." 2 U.S.C. §431(f)(1)(A)(B).

Expenses, however, may be incurred for either campaign-related or non-campaign-related activity. Thus, the allocation of expenses between campaign and non-campaign-related travel by an individual other than a candidate is set forth in Section 106.3 of the

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040010807

John G. Murphy, Jr., Esquire
October 12, 1976
Page Eight

proposed regulations. That section provides for a reasonable allocation to determine reportable expenditures:

"Where an individual, other than a candidate, conducts campaign-related activities on a trip, the portion of the trip attributed to each candidate shall be allocated on a reasonable basis."
Section 106.3(c)(2), 41 Fed.Reg. 35945 (Aug. 25, 1976).

In addition, subsection (e) of Section 106.3 points out that where authorized by law or required by national security, accompanying staff and equipment are not considered expenditures. Included in this exclusion are Secret Service and other security personnel.

Thus, the only standard for a campaign committee such as the PFC which establishes the allocation of expenditures between campaign and non-campaign-related travel, is one of reasonableness. We contend that the memoranda attached hereto (Exhibits J-M) which discuss the PFC position on allocation of expenditures are conservative and more than meet this standard. Expenses are allocated to the PFC based on either the time spent influencing the candidacy of the President or the direct costs incurred for such activity. The PFC has consistently applied this allocation formula to mixed official/candidate related activity on a uniform basis.

Moreover, the FEC has been generally aware of this allocation formula since last year when we testified before the Commission during its hearings on the allocation regulations. At no time has the Commission notified the PFC that the allocation formula is anything other than reasonable. In addition, it should be noted that in adopting the general standard of reasonableness, the FEC rejected serious attempts by its staff and the Allocation Task Force headed by Commissioner Staebler to specifically define appropriate allocation rules.

Finally, on September 8, 1976, James A. Baker, III, Chairman of the President Ford Committee, forwarded a memorandum to the Cabinet regarding advocate travel. (Exhibit L). Mr. Baker stated that:

"[F]or the General Election period, the following rebuttable presumptions have been established in order to guide both the PFC and the advocates regarding their travel and payment for related expenses:

1. All public appearances by Cabinet members after the nomination will be considered

OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

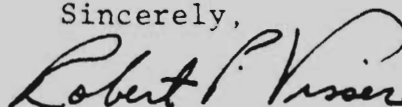
John G. Murphy, Jr., Esquire
October 12, 1976
Page Nine

candidate-related in nature and paid for by the PFC, except those official activities scheduled by the respective agency prior to August 19, 1976; and

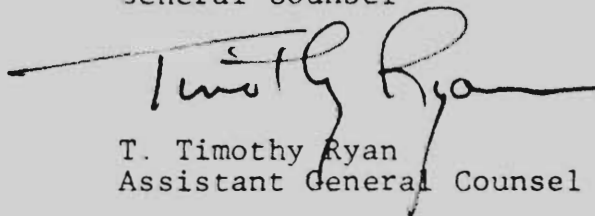
2. All public appearances by Cabinet members after October 16, 1976, including those official activities scheduled by the respective executive agency prior to August 19, 1976, will be considered candidate-related in nature and paid for by the President Ford Committee."

78040010800
This memorandum from the Chairman of the President Ford Committee and the related correspondence from James E. Connor, Secretary to the Cabinet, dated October 1, 1976 (Exhibit M) clearly reflect the manner in which this Committee strives to fully comply with the letter and spirit of the new campaign laws. This memorandum, as well as the earlier memoranda regarding advocate travel and the allocation of expenditures incurred therein, conclusively demonstrate the high standard of reasonableness set by the PFC. Since the attached documentation fully substantiates the allocations made by the PFC in connection with the matters under review, the PFC respectfully submits that the above-referenced complaints are without merit and should be dismissed.

Sincerely,



Robert P. Visser
General Counsel



T. Timothy Ryan
Assistant General Counsel

Enclosures --
Exhibits A through M

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040010810

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
U.S. DEPT. OF JUSTICE

Ex. A



U.S. DEPARTMENT OF COMMERCE
Office of the Secretary
Washington, D.C. 20230

September 30, 1976

MEMORANDUM FOR TIM RYAN

FROM

JOAN LEWIS *jl*

Per our conversation, listed below are the total costs incurred by the Department of Commerce and the President Ford Committee for the four trips of Secretary Richardson in question:

1. Fort Wayne, Indiana - April 8, 1976

Total cost to DOC and PFC \$ 1,444.68

2. Birmingham, Alabama - Memphis, Tennessee -
Little Rock, Arkansas - April 28-29, 1976

Air fare for Secretary and aide \$ 362.00
Miscellaneous 26.00
Total cost to DOC and PFC \$ 388.00

3. Los Angeles, California - May 10-11, 1976

Air fare for Secretary and aide \$ 1,144.00
Miscellaneous 18.25
Total cost to DOC and PFC \$ 1,162.25

4. Milwaukee, Wisconsin - Midland, Michigan -
Detroit, Michigan - May 13-14, 1976

Air fare for aide 157.00
Miscellaneous 19.17
Total cost to DOC and PFC \$ 176.17

TOTAL COST FOR FOUR TRIPS \$ 3,171.10

-- The total does not include overtime for driver (if any) nor gas and mileage costs to and from airport.

cc: JMW

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040010812

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF CHIEF COUNSEL

WEATHER

Columbia - Cloudy, no precipitation
 about 50°
 High - Cloudy, chance of
 freezing rain
 Temp. about 44°

SCHEDULE
 SECRETARY SIMON
 S.C. CHAMBER OF COMMERCE
 AND

RALEIGH CHAMBER OF COMMERCE
 JANUARY 20, 1976

Tuesday, January 20

11:00 a.m. Wheels up for Columbia, S.C. with Berle, Rhetican, Senator Strom Thurmond and Sec. Maryl

11:47

Pilot: Captain Ruths
 Tail No: 24200
 Flight Time: 1 hour, 25 minutes

12:30 p.m. Arrive Columbia, S. C.
 Eagle Aviation
 Enroute to Carolina Inn
 937 Assembly Street
 (803) 799-8200
 (Driving Time: 15 Minutes)

NOTE: Extra car for Berle, Gartland and Rhetican

12:45 p.m. Arrive Inn for Reception
 Mezzanine Area

To be met by: Elric Hooley, Outgoing President of S. C. Chamber and John Hissick, Executive Vice President, S. C. Chamber

1:00 p.m. Proceed to Main Ballroom with Senator Thurmond for luncheon - Rooms C & D

1:45 p.m. Introduction of Secretary Simon by Sen. Thurmond
 Begin Remarks (15-20 minutes)

NOTE: -500-600 attending
 -No Question & Answer session
 -Press in audience
 -Lecturn on head table
 - Secretary seated between Hissick and Hooley
 -elected President of Chamber and Hissick
 -Room reserved for the Secretary

2:05 p.m. Conclude remarks

5 p.m. Depart Carolina Inn for reception with 20 Black Republican Leaders in Governor Edwards' Hall
 (Located across the street from the Carolina Inn)

FEDERAL ELECTION COMMISSION
 OFFICIAL FILE COPY
 OFFICE OF GENERAL COUNCIL

- 2:20 p.m. Reception begins
- 3:00 p.m. Conclude meeting and depart for Governor's Mansion with Governor Edwards for a reception with 100-150 South Carolina Bankers (Driving Time: 10 minutes)
- 3:10 p.m. Arrive Mansion
- 3:15 p.m. Reception begins (45 minutes)
- 4:00 p.m. Conclude reception and depart for airport (Driving Time: 15 minutes)
- 4:15 p.m. Arrive airport and Wheels Up for Raleigh, North Carolina with Eberle, Rhatican, Garland and Secret Service

Pilot: Captain Ruths
Tail No: 24200
Flight Time: 40 minutes

- 5:00 p.m. Arrive Raleigh, N. C.
Raleigh-Durham Airport Authority
Enroute to WRAL-TV with Rhatican
261 Western Boulevard
(Driving Time: 20 minutes - depending on traffic)

NOTE: Extra car for Eberle and Garland to Royal Villa Inn

- 5:20 p.m. Arrive TV station for "Capitol Closeup" interview (25 minutes)
(919) 823-2511

Interviewer: Joel Lawton

- 5:45 p.m. Conclude interview and depart for Royal Villa Inn
Highway 70 West
(919) 782-4433
(Driving Time: 15 minutes - depending on traffic)

1 hour behind
schedule

- ~~6:00 p.m.~~ Arrive Royal Villa Inn and proceed to Suite reserved for the Secretary

- 7:10
~~6:30~~ p.m. PFC Reception
Parlor E

7:10 - 7:40

- 7:40
2:30
NOTE: About 25 attending

- ~~7:45~~ p.m. Depart PFC reception and depart for Raleigh Chamber of Commerce reception
Fiesta Brava Room

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

5 p.m. Depart reception and proceed to Kings
Hall for dinner

NOTE: Head table to be in Black Tie

9:00 p.m. •Introduction of Secretary Simon by Sen. Jesse Helms
Begin Remarks (30 minutes)

NOTE: -700-800 attending
-No Question & Answer session
-Lecturn on table
-Press in audience
-Secretary seated between Sen. Helms and
Mrs. Erma Delacourt, wife of President
of Raleigh Chamber of Commerce

9:30 p.m. Conclude remarks

9:35 p.m. Depart for airport
(Driving Time: 10 minutes)

9:45 p.m. Arrive airport and wheel up for Andrews with
Senator Helms, Cong.-Broyhill, Eberle, Garrison,
Garland, and Secret Service

Pilot: Captain Ruths
Tail No: 24200
Flight Time: 45 minutes

10:30 p.m. Arrive Andrews Air Force Base

CONTACTS: S.C. Chamber of Commerce
John Riddick or Russ Millett
(803) 779-6270

Raleigh Chamber of Commerce
Edward Garland
(919) 833-3005

Receptions (In Governor's office and mansion)
Hal Eberle (Treasury)

PFC Reception
Steve Crouch
(919) 829-5811

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF LEGAL COUNSEL

OFFICE OF THE SECRETARY OF THE TREASURY
WASHINGTON, D. C. 20530

June 8, 1976

Mr. Robert Odell
President Ford Committee
1828 L Street, N.W.
Suite 250
Washington, D. C. 20036

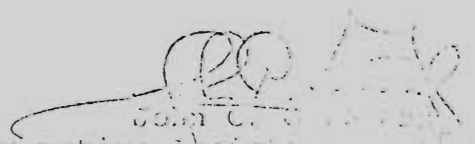
Dear Bob:

Enclosed herewith in connection with the party's trip of January 20, 1976 to South Carolina and North Carolina, you will find an invoice in the sum of \$17,000. This sum represents the proportionate cost of the President Ford Committee reception in South Carolina on that date. The invoice figure was computed in accordance with the guidelines set forth in our memorandum of March 19, 1976 to Honorable General Counsel of the President Ford Committee. The guidelines were expressly approved by the President.

I apologize for the delay in transmitting these costs to you, but I've just recently received the invoice necessary to compute the proper costs. Would you still have prepared as soon as possible a check payable to the "U.S. Treasury" to cover the President Ford Committee's share of the costs?

Should you have any questions concerning this matter, please don't hesitate to give me a call.

Very truly yours,


John C. O'Connell
Executive Assistant to the Secretary

Enclosure

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



THE SECRETARY OF THE TREASURY

WASHINGTON 20220

June 8, 1976

INVOICE

FROM: Department of the Treasury

TO: The President Ford Committee

For costs attributable to PFC in connection
with Secretary Simon's attendance at PFC Reception in
Raleigh, North Carolina on January 20, 1976.
(See attached letter for explanation). . . \$17.12.

Signed:

[Signature]
John A. Barnes, Jr.
Executive Assistant
to the Secretary

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

730400100317

10

TRAVEL EXPENSE BREAKDOWN - CHARTER FLIGHTS

DATE: March 1964

CHARTER SERVICE: _____

PLACES (CITIES): _____

STAFF: _____

1964 1964

ITINERARY	POLITICAL	NON-POLITICAL

ITINERARY

POLITICAL

NON-POLITICAL

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

ITINERARY	POLITICAL	NON-POLITICAL

7804001081

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

North Carolina

PFC -

10:30

Ann

10:57

Depart 11:47 -

Total

Ann

10:58

10:53

Reception -

7/10

7:40 -

30 min

2

15

6.53 min 15000

65

377.89
9 13,023.00

377.89

24

62

56

63

56

70

64

60

56

4

05

18.8940

18.89

3
16.05

05

80.25 2.01

16.05
16

18.89

18.89

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

PFC -

North Carolina

7-27-79

590

Airfare

$2310. \div 8 = 288.75$

Fuel

$24.03 \div 8 = 3.00$

3.00

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040010822

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

EX. C
FEB 11 1976
JAN 11 1976
XSC51

TUESDAY, FEBRUARY 10

(Wash-Jackson, Miss.-Jacksonville, Fla.)

4:15 p.m. 4 03 Wheels up for Jackson, Miss. with Gartland,
Rhatican and Secret Service

Pilot: Maj. Gillis
Tail No: 12488
Flight time: 2 hours, 20 mins.
Time Change: -1

5:35 p.m. 5 22 Arrive Jackson, Miss. (Thompson 11:10)
Enroute to Deposit Guaranty Bank Bldg
200 East Capital Street
(601) 969-4011
(Driving time: 10-15 minutes)

To be met by: Clark Reed and 11:20
State Finance Chairman
will ride with the S. 11:20

6:00 p.m. 6 47 Arrive Bank Building and proceed
to Board Room (4th floor)

6:00 p.m. 6 5 Press Availability
(15-20 minutes)

6:20 p.m. 6 2 Conclude and proceed to reception
University Club - Grill Room - 2nd floor)

7:00 p.m. 6 1 Introduction of Secretary Siron by Clark R. L.
Chairman, Mississippi Republican Party
Grill Room

Begin Remarks (5-10 mins.)

NOTE: -150 attending
-No Press attending
-Q&A session to follow
-Stand-up podium

7:45 p.m. 7 1 Conclude and depart for airport
(Driving time: 10-11 minutes)

8:00 p.m. 8 1 Arrive airport and wheels up for Jacksonville, Fla.
w/Gartland, Rhatican and Secret Service

Pilot: Maj. Gillis
Tail No: 12488
Flight time: 1 hour, 20 mins.
Time change: +1

Dinner on plane

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

1 p.m.

Arrive Jacksonville, Fla. International
(Airkamman private terminal)
Enroute to Hilton Hotel
565 Main Street South
(904) 398-3561
(Driving time: 20-25 mins.)

10:45 p.m.

Arrive Hotel

NOTE: Florida Suite reserved for the
Secretary

Overnight

WEDNESDAY, FEBRUARY 11

(Jacksonville, Fla.-Clearwater, Fla.)

6:30 Coffee Suite

7:10 a.m.

Depart Hotel for Duval County PMA
Breakfast
Dutch Treat Strickland Townhouse
Philip Highway
(904) 396-1682
(Driving time: 15 minutes)

7:25 a.m.

Arrive Stricklands and proceed to
Sogovia Room #2

To be met by: Jack Carter, Chairman, Advisory
Committee for President Ford

7:30 a.m.

Breakfast begins

8:00 a.m.

Introduction of Secretary Simon by Jack
Carter

Begin Remarks (10-15 mins.)

NOTE: -100 attending

-OEA session to follow (10-15 mins.)
-Head table with lectern

8:30 a.m. - 8:40 a.m.

Conclude and Depart for Florida Times Union
One Riverside Avenue
(904) 791-4234
(Driving time: 10-12 minutes)

9:00 a.m.

Arrive Florida Times Union

9:00 a.m.

Meeting begins

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

PFC

0 a.m. Conclude and Depart for WJXT-TV
Channel 4, Broadcast House
1851 Southhampton Road
(904) 399-4000
(Driving time: 10 minutes)

0:10 a.m. Arrive WJXT-TV for briefing
re the program

0:30 a.m. Begin interview
(30 minutes)

1:00 a.m. Conclude and depart for Thunderbird
Motor Hotel
5865 Arlington Expressway
(904) 724-3410
(Driving time: 15-20 minutes)

1:20 a.m. Arrive Thunderbird and proceed to Ball Room

To be met by: William Sheffield, President,
Jacksonville Board of Realtors

1:30 a.m. Press Conference (Jacksonville Board of Realtors)
Jacksonville Board of Realtors, 20.21. in
Terrace Room

2:45 p.m. Introduction of Secretary Simon by Lever
Taylor, Jr., Former President of Jacksonville
Board of Realtors

Begin remarks (15-20 minutes)

NOTE: -500 people attending
-Press & media invited
-Q&A session to follow (15-20 minutes)
-Head Table with lectern

4:45 p.m. Depart for Jacksonville airport (Airbusman)
(Driving time: 30 mins.)

5:15 p.m. Arrive Airport and wheels up for Clearwater,
Fla. w/Gartland, Whatican and Secret Service

Pilot: Larry Dorman
Tail No: N4075-Q
Flight time: 1 hour

5:15 p.m. Arrive Clearwater, Fla. (Interair Services)
Enroute to Sheraton Sand Key
1160 Gulf Boulevard
(813) 595-1611
(Driving time: 25 minutes)

5:40 p.m. Arrive Sheraton Sand Key
(Suite 830, 832, 834)
STAFF TIME

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

- 5:00 p.m. Arrive for press availability
Room 354
- 5:45 p.m. Proceed to Lobby outside Main Ballroom for
Receiving Line
- 7:15 p.m. Proceed to holding room for head table
(Next to Main Ballroom)
- 7:30 p.m. Lincoln Day Dinner Begins
Main Ballroom
- 8:15 p.m. Program begins
- 8:30 p.m. Introduction of Secretary Simon by Corp. Counsel
Begin speech (25 minutes)

NOTE: -800 attending
-Press attending
-No Q&A Session
-Headtable with lecturn

OVERNIGHT

THURSDAY, FEBRUARY 12

Clearwater, Tampa, Orlando, Miami, Palm Beach

- 7:30 a.m. Depart Hotel for Clearwater Airport *for Tampa Tribune*
(Driving Time: 15 minutes)
- 7:45 a.m. ~~Depart by Helicopter for Sun City Center
Hillsborough County, Tampa
Cherry Hills Drive with Garland and Secret
Service Pilot G. Sells-Tail No. 59000
(Flying Time: 15 minutes) - Landing at Sun City~~
- 8:00 a.m. ~~Arrive for coffee and doughnuts with
Senior Citizens Group
Main Conference Room~~
- Removed from
schedule*
- ~~To be met by: John and Edna Redington~~
- 8:15 a.m. ~~Introduction of Secretary Simon by Mr. Redington
Begin Informal Remarks (15 minutes)~~
- ~~NOTE: -Anywhere from 150-500 attending
-Q&A session if time permits
-Stage with chairs and podium~~

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

9:45 a.m. Depart by Helicopter from Sun City Center to
Downtown Tampa with Gartland and Secret Service
(Flying Time: 15 minutes)

10:00 a.m. 9:30 Arrive Tampa -100 N. Ashley (Front of Sun City Center)
Enroute to Tampa Tribune
202 South Parker
(813)272-7711
(Driving Time: 5 minutes)

10:05 a.m. Editorial Board Meeting Begins
(45 minutes)

10:50 a.m. 10:50 Conclude Editorial Board Meeting

10:55 a.m. Depart for Clearwater by Helicopter
(Flying Time: 15 minutes)

11:10 a.m. 11:10 Arrive Clearwater Airport and wheels up for
Orlando, Florida with Gartland, Rhatican and
Secret Service

Pilot: Larry Dorman
Tail No: N4075-Q
Flight Time: 30 minutes

12:05 p.m. 12:05 Arrive Orlando Airport (Enroute to Executive Club)
Enroute to Executive Club in Cold Key Inn
7100 S. Orange Blossom Trail
(305)855-0050
(Driving Time: 20 minutes)

12:00 Noon 12:05 Arrive Cold Key Inn and proceed to Executive Club
for Reception

1:30 p.m. Luncheon (Executive Club)
Press Conference

1:15 p.m. 1:15 Introduction of Secretary Simon by Sharon
Dantzler, President First Federal Savings & Loan

Begin Remarks (20 minutes)

NOTE: -200 attending
-Lecturn on dais
-Press at luncheon
-Q&A to follow (10 minutes)

1:45 p.m. Conclude and depart for airport
(Driving Time: 20 minutes)

2:05 p.m. 2:25 Arrive Orlando airport and wheels up for Miami
with Gartland, Rhatican and Secret Service

Pilot: Larry Dorman
Tail No: N4075-Q
Flight Time: 1 hour

PFC

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

8:05 p.m. Arrive Miami Airport (Hero Facility)
Enroute to Miami Herald
#1 Herald Plaza (off Biscayne Blvd. - Between 14th & 15th St)
(305) 350-2111
(Driving Time: 20 minutes)

8:25 p.m. Arrive for Editorial Board Meeting
(45 minutes)

8:10 p.m. Conclude meeting

8:15 p.m. Depart for Doral Hotel on the Beach
4833 Collins Avenue
(305) 532-3600
(Driving Time: 25 minutes)

8:35 p.m. Arrive Hotel

STAFF TIME

NOTE: -Penthouse 22, 24, 26, 28 reserved for
the Secretary and Staff

9:00 p.m. Press Availability
Regency Conference Room

9:20 p.m. Proceed to Miramar (Mediterranean)
for Dade/Broward FEC reception.

9:55 p.m. Depart Miami Junior Achievement/Chamber
of Commerce Reception

10:00 p.m. Junior Achievement Reception
Grand Promenade Room

10:30 p.m. Dinner Begins (Informal)
Mediterranean Ballroom

10:30 p.m. Program Begins (Awards Banquet - 15 minutes)

10:15 p.m. Introduction of Secretary Simon by James Brown,
Vice President, Southern Bell and President, Chamber
Miami Chamber of Commerce

Begin Speech (20 minutes)

NOTE: -250-300 expected
-Press invited.
-NO Q&A
-No head table (tables of 10 - no raised dais)
-Stand-up podium

11:00 p.m. Conclude and depart for Doral landing pad

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

10:00 p.m. Depart by Helicopter for West Palm Beach
with Rhatican and Secret Service
(Flying Time: 30 minutes)

Pilot: Bill Riggs
Miami Helicopter Service
(305) 688-6778

10:30 p.m. Arrive West Palm Beach
Enroute to 318 Caribbean Road
West Palm Beach

OVERNIGHT

FRIDAY, FEBRUARY 13
(West Palm Beach)

11:30 a.m. Depart residence for PFC Headquarters
170 Okee Chobee Boulevard
(Driving Time: 10 minutes)

11:40 a.m. Arrive PFC Headquarters for handshaking
(10-15 minutes)

To be met by: Rhatican and Flitts Robinson
(305) 655-6458
(305) 688-6734

1:55 a.m. Depart for Palm Beach Breakers
1 South County Road
(305) 655-6611
(Driving Time: 5 minutes)

2:00 Noon Press Conference
Palm Beach Breakers
Gold Room

2:30 p.m. Conclude press conference and proceed to
Economic Council of Palm Beach County
Luncheon
Venetian Ballroom

1:10 p.m. Introduction of head table and
Gerry Thomas

:15 p.m. Introduction of Secretary Simon by Gerry Thomas.
Former State Senator; Chairman and President of
First National Bank and Trust of Jupiter-Inn, Florida;
and Chairman of the Florida Conservative Union

Begin Remarks (20 - 25 minutes)

NOTE: -500 Attending
-Press and media invited
-NO Q&A session
-Head table with lecturn

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

1:40 p.m.

Conclude marks

1:00 p.m.

Depart Breakers for Century Village
(Jewish Retired Community)
(Driving Time: 12 - 15 minutes)

2:00 p.m.

Arrive at Century Village and proceed to Auditorium

Brief Remarks with Q&A's

NOTE: -1,200 attending
-Press and media invited

2:30 p.m.

Depart Century Village for residence
(Driving Time: 15 minutes)

STAFF TIME

PFC

VACATION

MONDAY, FEBRUARY 16

(Ft. Worth, Tex. and Mobile, Ala.)

Depart for airport with Mrs. Simon, Julie Simon

7:40 a.m.

Arrive Palm Beach airport and wheels up for
Ft. Worth with Mrs. Simon, Julie Simon,
John Harper

Pilot:

Tail No:

Flight Time: 2 hours, 50 minutes

Time Change: -1 hour

9:30 a.m.

Arrive Ft. Worth (Meacham Field)
Enroute to Ft. Worth Sheraton
815 Main Street
(817) 332-3151
(Driving Time: 20 minutes)

10:50 a.m.

Arrive Sheraton and proceed to Grand Ballroom
16th Floor

To be met by: Bayard Friedman, President, Ft. Worth
National Bank

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

SCHEDULE
SECRETARY SIMON
FT. WORTH, TEXAS & MOBILE, ALABAMA
FEBRUARY 16, 1976

Monday, February 16

8:40 a.m. Arrive Palm Beach airport (Palm Beach Aviation) and wheels up for Ft. Worth with Mrs. Simon, Julie Simon, John Harper

Pilot: Capt. Butler
Tail No: 12488
Flight Time: 2 hours, 50 minutes
Time Change: -1 hour

10:30 a.m. Arrive Ft. Worth - Meacham Field (Butler Aviation)
Enroute to Ft. Worth Sheraton
815 Main Street
(817) 332-3151
(Driving Time: 20 minutes)

10:40 a.m. Arrive Sheraton and proceed to Grand Ballroom
16th floor

To be met by: Bayard Friedman, President, National Bank

11:00 a.m. Introduction of Secretary Simon by Bayard Friedman
Begin Speech (20-30 minutes)

NOTE: -2,000 attending
-Q&A to follow
-Press attending
-Lecturn on dais

11:30 a.m. Conclude speech and begin Q&A
(15 minutes)

~~11:45 a.m. Conclude Q&A session~~

11:50 a.m. Depart for PFC luncheon at Ft. Worth National Bank
(Driving Time: 3-5 minutes) with Mrs. Simon and
(817) 332-8434

11:55 a.m. Arrive Bank and proceed to 34th floor
Executive Dining Room

To be met by: Bayard Friedman

NOTE: Bank will be closed for official
holiday - only dining room open

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

12:35 p.m.

Luncheon served

1:00 p.m.

Introduction of Secretary Simon by

Begin Remarks (20 minutes)

NOTE: -Informal remarks - request

No prepared text

-75 attending

-Remarks and Q&A will
be after lunch

-No head table - small tables of 8

-Stand-up podium

-Mrs. Simon, Julie and John Harper at
same table

PFC

1:20 p.m.

Informal Q&A session will begin (15 minutes)

1:40 p.m.

Conclude and depart for Meechanfield with
Mrs. Simon, Julie Simon, John Harper
(Driving Time: 20 minutes)

2:00 p.m.

Arrive and Wheels Up for Mobile with Mrs. Simon,
Julie Simon and John Harper

Pilot: Capt. Butler

Tail No: 12438

Flight Time: 1 hour, 13 minutes

3:15 p.m.

Arrive Mobile (Brookley)

Enroute to Admiral Semmes Hotel for press conference

251 Government

(205) 433-2771

(Driving Time: 10 minutes)

3:25 p.m.

Arrive for press conference

Wallace Pitts Room (top floor)

3:50 p.m.

Conclude and depart for Suite 1201

STAFF TIME

5:20 p.m.

Depart Admiral Semmes for PFC reception at Pelican Inn
359 Church Street

(205) 433-4701

(Driving Time: 5 minutes)

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

5:25 p.m.

Arrive Mauga Inn and proceed to PFC

To be met by: Ron Lott, President, PFC National Bank

6:00 p.m.

Depart PFC reception and proceed to reception for General Membership in the Restaurant (Lobby Level) of the Admiral James Hotel (Driving Time: 5 minutes)

NOTE: Receiving Line with Cong. Lott

6:25 p.m.

Depart for head table reception Room 205-206 (mezzanine)

6:55 p.m.

Depart for dinner (black tie/head table) Ballrooms A&B

7:00 p.m.

Dinner begins

7:45 p.m.

Introduction of Secretary Simon by Cong. Jack Edwards

Begin Remarks (20 minutes)

NOTE: -600 attending
-Press in audience
-Lecture on dais

8:05 p.m.

Presentation of Honorary Member of PFC by Cong. Committee and Honorary Citizen of Hawaii to the Secretary (5 minutes)

8:15 p.m.

Conclude and depart for airport with Mrs. Simon, Julie Simon (Driving Time: 20 minutes)

8:35 p.m.

Arrive Mobile airport and wheel up with Mrs. Simon, Julie Simon, Cong. Edwards, John Harper

Pilot: Capt. Butler
Tail No: 12488
Flight Time: 2 hours
Time Change: +1

11:35 p.m.

Arrive Andrews Air Force Base

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

WILLIAM SIMON -- Trip to Jackson, Mississippi
and Jacksonville, Florida,
Orlando, Florida,
Ft. Worth, Texas and
Mobile, Alabama
February 10-16, 1976

- A. Total time away from Washington, D. C. 88 hours
Feb. 10 - 4:00 p.m. - Feb. 16 12 Midnight
Personal time - Feb. 13 3:30 p.m. - Feb. 16 8:00 a.m.
- B. Accompanied by eight persons
- C. Total PFC time 6.5 hours
Feb. 11 7:15 - 9:00 a.m.
12 6:30 - 7:00 p.m.
13 11:30 - 12:00 Noon
16 11:45 a.m. - 1:30 p.m.
5:05 p.m. - 6:00 p.m.
- D. Total cost of trip for Advocate
Flights and food \$2,209.60
Other - None submitted
- E. Allocation -
$$\$2209.60 \div 88 = \$25.10 \times 6.5 = \$173.15$$

78040010831

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



OFFICE OF THE SECRETARY OF THE TREASURY

WASHINGTON, D. C. 20220

June 8, 1976

Mr. Robert Odell
President Ford Committee
1828 L Street, N. W.
Suite 250
Washington, D. C. 20036

016
944
6/9

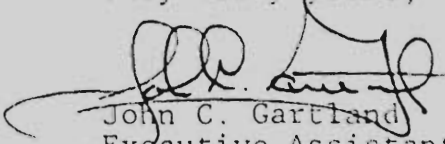
Dear Bob:

Enclosed herewith in connection with Secretary Simon's trip of February 11, 1976 to Jacksonville, Florida and February 12, 1976 to Orlando, Florida, you will find an invoice in the sum of \$243.43. This sum represents the proportionate cost attributable to the President Ford Committee breakfast and luncheon in Florida on those dates. The invoice figure has been computed in accordance with the guidelines established in our memorandum of March 19, 1976 to Robert P. Visser, General Counsel of the President Ford Committee. The guidelines were expressly approved by Mr. Visser.

I apologize for the delay in transmitting these costs to you, but I've just recently received the invoice necessary to compute the proper costs. Would you please have prepared as soon as possible a check made payable to the "U.S. Treasury" to cover the President Ford Committee's share of the costs?

Should you have any questions concerning this matter, please don't hesitate to give me a call.

Very truly yours,


John C. Gartland
Executive Assistant
to the Secretary

Enclosure

1720
OK per
6/9/76
FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



THE SECRETARY OF THE TREASURY

WASHINGTON 20220

June 8, 1976

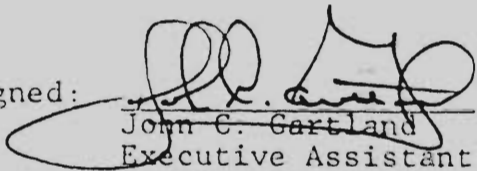
INVOICE

FROM: Department of the Treasury

TO: The President Ford Committee

For costs attributable to PFC in connection with Secretary Simon's attendance at PFC Breakfast in Jacksonville, Florida on February 11, 1976 and a PFC Luncheon in Orlando, Florida on February 12, 1976. (See attached letter for explanation) ... \$243.43.

Signed:


John C. Gartland
Executive Assistant
to the Secretary

78040010833
a15
a15
120. 313 R
3677. 4/9/76
243.43
FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



OFFICE OF THE SECRETARY OF THE TREASURY

WASHINGTON, D.C. 20220

June 8, 1976

Mr. Robert Odell
President Ford Committee
1828 L Street, N. W.
Suite 250
Washington, D. C. 20036

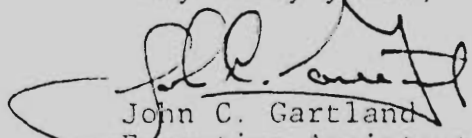
Dear Bob:

Enclosed herewith in connection with Secretary Simon's trip of February 16, 1976 to Fort Worth, Texas and Mobile, Alabama, you will find an invoice in the sum of \$201.16. This sum represents the proportionate cost attributable to the President Ford Committee luncheon in Texas and the reception in Alabama on that date. The invoice figure has been computed in accordance with the guidelines established in our memorandum of March 19, 1976 to Robert P. Visser, General Counsel of the President Ford Committee. The guidelines were expressly approved by Mr. Visser.

I apologize for the delay in transmitting these costs to you, but I've just recently received the invoices necessary to compute the proper costs. Would you please have prepared as soon as possible a check made payable to the "U.S. Treasury" to cover the President Ford Committee's share of the costs?

Should you have any questions concerning this matter, please don't hesitate to give me a call.

Very truly yours,


John C. Gartland
Executive Assistant
to the Secretary

Enclosure

OK
ROM.
6/9/76
FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL
J. H. H.



THE SECRETARY OF THE TREASURY

WASHINGTON 20220

June 8, 1976

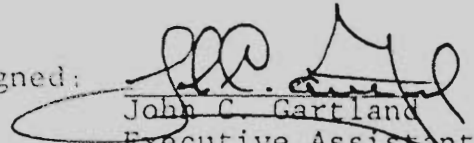
INVOICE

FROM: Department of the Treasury

TO: The President Ford Committee

For costs attributable to PFC in connection with Secretary Simon's attendance at PFC Luncheon in Fort Worth, Texas and a PFC Reception in Mobile, Alabama on February 16, 1976. (See attached letter for explanation) ... \$201.16.

Signed:


John C. Gartland
Executive Assistant
to the Secretary

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

7-78

3693-6/9/76

201.16

78040010833

78040010837

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

SCHEDULE
SECRETARY SIMON
MARCH 30, 1976
NEW YORK

TUESDAY, MARCH 30

2:30 p.m.

Wheels up from Page Airways for New York
with Mrs. Simon, Gartland, Yeo & Secret Service

Pilot: Arnold Rosenthal
Co-Pilot: Jim Martin
Tail No: Piper Navajo - N9100V
Flight Time: 1 hour, 30 minutes
(includes landing time)

4:00 p.m.

Arrive LaGuardia (General Aviation Terminal)
Enroute to the Links
36 East 62nd Street
(212)TES-8181
(Driving Time: 40-45 minutes)

4:40 p.m.

Arrive Links and proceed to Roof Garden
for reception (Stag)

NOTE: Diana Brokaw, PFC, New York, will
meet Mrs. Simon and escort to Univ. Club

5:15 p.m.

Introduction of Secretary Simon by R. L.
"Tim" Ireland, III, Partner, Brown Bros.
Harriman

NOTE: - Brief Informal remarks
- 30 attending
- No press invited
- Informal discussion to follow

5:50 p.m.

Conclude and depart for
University Club
1 West 54th Street
(212)DI7-2100
(Driving Time: 10 minutes)

6:00 p.m.

Arrive University Club

NOTE: - Room reserved for Secretary
and Mrs. Simon and room
reserved for Mr. Gartland

6:25 p.m.

Proceed to reception 1st floor
(roped off area)

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

6:30 p.m.

Arrive reception with Mrs. Simon

7:00 p.m.

To be met by: Harold Helm, Honorary
Director, Chemical Bank

8:15 p.m.

Proceed to 7th floor dining room for
dinner (Black Tie)

Introduction of the Secretary by
Mr. Harold Helm

Begin Remarks (20 minutes)

NOTE: - 500+ attending
- No formal raised head table
- Stand-up podium
- Q&A to follow
- List of attendees at Secretary's table

9:15 p.m.

Conclude and depart for airport with
Mrs. Simon, Gartland and Secret Service
(Driving Time: 30 minutes)

9:45 p.m.

Wheels Up for Washington with Mrs. Simon,
Gartland, Yeo and Secret Service

Pilot: Arnold Rosenthal Co-Pilot: Jim Wright
Tail No: N9100Y

11:15 p.m.

Flight Time: 1 hour, 30 minutes (including
landing times)

Arrive Washington Page Airways

CONTACTS:

Diane Brokaw (The Links)
(212) 759-9380

Harold Helm (University Club)
(212) 922-6338

Bernard Wicker (Colgan Airways)
631-1933

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

LIST OF ATTENDEES AT SECRETARY'S TABLE

Mr. and Mrs. Harold Helm
Mr. and Mrs. William P. Arnold
Mr. and Mrs. Norborne Berkeley
Mr. and Mrs. Richard I. Bonsal
Mr. Richard L. Brecker
Mr. and Mrs. Henry Gadsden
Mr. and Mrs. Augustine R. Marusi
Mr. and Mrs. J. Wilson Newman
Dr. and Mrs. Pierre Rinfret
Mr. and Mrs. Richard Shinn
Mrs. Martin White

78040010842

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Dear Mr. Connell:

Due to our billing procedures being at Treasury we must ask you to resubmit the bills for the following trips:

- March 30 - D. C. to New York and return
- May 24 - D. C. to New York to Philadelphia and return

Would you please bill to Treasury \$807.32 for the March 30 trip and \$807.32 for the May 24 trip. The balance \$29.01 for the March 30 trip and \$29.01 for the May 24 trip should be billed to the Travel Committee, 1928 L Street, N. W., Suite 250, Washington, D. C. 20037, ATTENTION: Kathy Plouffe.

Sorry about the inconvenience, but due to political billing guidelines this is the way it has to be done.

Again, thanks and if you have any questions do not hesitate to call on me.

Sincerely,

John C. Gartland
Executive Assistant to
the Secretary

Mr. Hershel Connell
Executive Vice President
Colgan Airways Corporation
Post Office Box 510
Manassas, Va. 22110

Enclosures

CHBell/cc
6/24/76

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

*Special Run - and
bill to the
Treasury -
bill to the
Treasury -
bill to the
Treasury -*

ITINERARY	POLITICAL	NON-POLITICAL
$27\% \times 644.76 = 174.08$ $B \ 644.76$ $- 174.08$ $= 470.68$ $\frac{1}{6} \times 174.08 = 29.01$	174.08 29.01	

7804001084

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
 OFFICE OF GENERAL COUNSEL

78040040846

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

SCHEDULE
SECRETARY SIMON
APRIL 21-24

WEDNESDAY, APRIL 21
(Rochester, New York
& Joliet, Illinois)

8.34

8:30 a.m.

Wheels Up from Page Airways with
Gartland, Rhatican and Secret Service

Pilot: Capt. Flower Co-Pilot: First Officer
Tail No: N306EJ Carroll
Flight Time: 55 min. - 1 hour

9.20

9:30 a.m.

Arrive Rochester, New York
Page Airways (716) 322-3720
Enroute to Gannett Newspapers
55 Exchange Street
(716) 232-7100
(Driving Time: 10 minutes)

9:40 a.m.

Arrive for Editorial Board meeting with
Rochester Democrat & Chronicle and
Rochester Times Union

9:45 a.m.

Editorial Board meeting begins
NOTE: List of attendees attached

10:45 a.m.

Conclude meeting

11:00 a.m.

Depart for Rochester Chamber of Commerce
Building
55 St. Paul Street
(716) 454-1220
(Driving Time: 5 minutes)

11:05 a.m.

Arrive Chamber Building for press
conference - Press Room

To be met by: Graham Annett, Chairman,
Monroe County Republican Committee

11:10 a.m.

Press Conference begins
(20 minutes)

11:30 a.m.

Conclude press conference and proceed
to Chairman's Club of Monroe County
reception - 1st floor Reception Room

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040010847

11:45 a.m.

Secretary introduced by [unclear]

- NOTE: - 5-10 minutes remarks
- Very informal
- No prepared text
- Brief Q&A to follow
- Stand-up podium
- 100 attending
- No press invited

12:10 p.m.

Conclude and depart for Rochester Better Business Bureau luncheon - Grand Hall

To be met by: Robert Hildreth, President
Rochester Better Business Bureau

12:15 p.m.

Luncheon Begins

12:45 p.m.

Secretary Simon introduced by Cong.
Barber Conable and begin remarks (20 min.)

- NOTE: - 500+ attending
- 20 minutes Q&A to follow
- Lecture on topics
- Press and Media invited

1:30 p.m.

Conclude luncheon session

1:40 p.m.

Depart for Univ. of Rochester C. [unclear]
Bldg. for meeting with Chancellor. [unclear]
(Driving Time: 10 minutes)

1:50 p.m.

Arrive Chancellor's office for meeting
Room 241, second floor

2:20 p.m.

Depart for airport
(Driving Time: 5 minutes)

2:25 p.m.

Arrive Rochester Airport and wheels up
for Joliet, Ill. with Gartland, Wharton
and Secret Service

Pilot: Capt. Sullivan Co-Pilot: First
Tail No: N302EJ Officer Williams
Flight Time: 1 hour, 35 minutes
Time Change: -1 hour

3:00 p.m.

Arrive Midway airport
Butler Aviation
Enroute to Sheraton Joliet
214 N. Ottawa Street
(815) 727-6544
(Driving Time: 45 minutes)

3:55 p.m.

Arrive Hotel

NOTE: - Suite 514-518 reserved for the
Secretary

STAFF TIME

4:55 p.m.

Depart for Will County Pop. Control Cntr.
reception with Cong. O'Brien - Back Room

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

5:00 p.m.

Arrive Reception

NOTE: - Photographer will be there for
some photos with attendees and
Secretary
- 100-150 attending
- 2-5 minute remarks
- Mostly mix & single affairs
- No Q&A session
- No press

5:00 6:15 p.m.

Press availability - Room 307-309
(15-20 minutes)

6:30 p.m.

Dinner begins - Main Ballroom

6:40 p.m.

Secretary & Cong. O'Brien enter Ballroom

7:30 p.m.

Secretary Simon introduced by Cong. O'Brien
Begin Remarks (20 minutes)

NOTE: - 400-500 attending
- No Q&A session
- Press and media invited

7:50 p.m.

Conclude remarks

8:00 p.m.

Depart for airport (45 minutes)

8:45 p.m.

Wheels Up for Tulsa, Oklahoma with
Rhatican, Garland and Secret Service

Pilot: Capt. Sullivan - Co-Pilot: First
Officer Williams

Tail No: N302EJ

Flight Time: 1 hour, 30 minutes

10:15 p.m.

Arrive Tulsa airport
Tulsair-Beechcraft (918) 835-7651
Enroute to Hilton Inn
5000 East Skelly Drive (918) 622-1000
(Driving Time: 15 minutes)

10:30 p.m.

Arrive Hotel

NOTE: - Suite 198-199 reserved for the
Secretary
- 2 singles for staff

OVERNITE

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

THURSDAY, APRIL 22

Tulsa, Okla.

7:50 a.m.

Depart hotel for KTUL-TV for interview
Lookout Mountain (918) 446-3351
(Driving Time: 20-25 minutes)

8:15 a.m.

Arrive KTUL-TV (ABC)

8:30 -
8:50 a.m.

Interview begins (AM CHURCHMAN - LIVE)

9:05 9:00 a.m.

Depart for Hilton Inn
5000 East Skelly Drive
(Driving Time: 15 minutes)

9:15 9:15 a.m.

Arrive for meeting with Robert Sellers,
Chairman, Cities Service and
corporate executives from Tulsa Area
Hospitality Suite No. 318

NOTE:- List of attendees attached

- Senator Bartlett will meet in Suite

9:54 9:50 a.m.

Depart for Tulsa Chapter of National
Association of Business Economists
Speech - El Grande Room

10:03 10:00 a.m.

Secretary Simon introduced by
Senator Deway Bartlett

Begin Remarks (30 minutes)

NOTE: - 325 attending
- Q&A to follow (on cards)
- Press & Media invited
- Secretary will be presented with a
gift before Q&A session begins

11:00 a.m.

Conclude session

11:05 a.m.

Depart for Tulsa Club
115 East 5th Avenue
(918) 587-5121
(Driving Time: 20 minutes)

11:25 a.m.

Arrive Tulsa Club and proceed to
8th Floor for reception

11:30 a.m.

Reception begins

12:00 NOON

Luncheon begins
Sky Terrace

1:00 p.m.

Secretary introduced by Jack Black, Chairman
State Finance Committee

Begin Remarks (30 minutes)

NOTE: - 100 attending
- Q&A to follow
- No Press
- Lecturn on table

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL
PFC

2:10 p.m.

Depart for Tulsa World
315 S. Boulder Avenue
(918) 583-2161
(Driving Time: 5 minutes)

2:15 p.m.

Editorial Board meeting begins

NOTE: List of attendees attached

3:15 p.m.

Conclude and depart for KTEW-TV (NBC)
3701 South Peoria
(918) 742-5561
(Driving Time: 15 minutes)

3:20 p.m.

Arrive KTEW -TV

3:30 p.m.

Interview begins (2) 15-minute interviews

4:00 p.m.

Depart for Hilton Inn

STAFF TIME

5:30 p.m.

Depart for Tulsa University
Interview with Tulsa Collegian
(Driving Time: 25-30 minutes)

6:00 p.m.

Interview begins by Mike Erwin - 2nd floor
Student Union

NOTE: - Mike Erwin will meet on 1st floor
- Mike Caskie, Past President Students
Association
- Rick Wood, President, Student Assn.
- Steve Steib, Economics Professor
will also attend interview

6:30 p.m.

Arrive President's Dining Room, 1st floor,
Student Union for reception with Executive
Staff of University

To be met by: Paschal Twyman, President
Tulsa University and welcoming party

7:25 p.m.

Depart for Kendall Hall for speech

NOTE: This is not a dinner

7:30 p.m.

Secretary Simon introduced by
Dewey Bartlett
Begin Remarks (20 minutes)

NOTE: - 400 attending
- Q&A to follow
- Theatre-style seating with
table and chairs
- Stand-up podium

PRIVATE DINNER FOR SECRETARY & STAFF & SEN. BARTLETT WILL BE
SERVED IN THE PRESIDENT'S DINING RM., 1st FLOOR AT 8:30 P.M.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

8:00 p.m.

Conclude and depart for airport with
Senator Bartlett
(Driving Time: 15-20 minutes)

NOTE: - Extra car for staff

8:50
9:20 p.m.

Arrive airport and wheels up for Oklahoma
City with Gartland, Senator Bartlett,
Khatican and Secret Service

Pilot: Capt. Sullivan - Co-Pilot: First
Tail No: N302EJ Officer Williams
Flight Time: 30 minutes

9:18
9:50 p.m.

Arrive Oklahoma City
AAR Facility (405)681-2361
Enroute to Skirvin Plaza
1 Park Avenue
(405)232-4411
(Driving Time: 20 minutes)

NOTE: - Extra car for staff

1045

- Suite 411 reserved for the
- 2 singles reserved for staff

OVERNITE

FRIDAY, APRIL 23
(Oklahoma City, Okla.) 9:15

9:28 9:25 a.m.

Depart for the Oklahoma
4th & Broadway (405)232-3311
(Driving Time: 5 minutes maximum)

9:32 - 11:00 9:30-10:30 a.m.

Editorial Board Meeting

NOTE: List of attendees attached

11:07 - 10:45 a.m.

Depart for Myriad Convention Center
E. K. Gaylord Boulevard & W. Sheridan Ave.
(405)232-8871 (Manager's Office)
(Driving Time: 5 minutes maximum)

11:15 10:55 a.m.

NOTE: Senator Bartlett will meet

Arrive Convention Center and proceed to
Press Room for press conference

To be met by: James Harlow, President
Oklahoma Chamber of Commerce and Paul
Strausbaugh, Executive Vice President,
Oklahoma Chamber of Commerce

11:20 11:00 a.m.

Press Conference begins (30 minutes)

11:45 11:30 a.m.

Conclude Press Conference and proceed
to President's Room for reception (30 mins.)

12:05 12:00 NOON

Luncheon begins
Great Hall

OFFICIAL COPY
OFFICE OF GENERAL COUNSEL

12:35

12:45 p.m.

James Harlow will introduce Dewey Lyons, State Chairman, Savings Bonds and Mr. Lyons makes remarks (2-3 minutes)

12:50 p.m.

Secretary Simon is introduced by Gen. McGee, Chairman and Chief Executive Officer, Kerr-McGee Corporation

Begin Remarks (20 minutes)

NOTE: - 500-600 attending
- No Q&A session
- Press & Media invited
- Lecture on table
- Senator Bartlett will attend

1:15 p.m.

Conclude and depart for KWTU "Dimension 10"
7401 N. Kelly
(405) 843-6641
(Driving Time: 15-20 minutes)

1:35 p.m.

Interview begins - KWTU (CBS)

Interviewer: Pam Olsen

2:05 p.m.

Conclude and depart for WHY-TV (NBC)
500 E. Britton Road
(405) 476-1212
(Driving Time: 20-25 minutes)

2:30 p.m.

Arrive WHY-TV for "Dialogue 75"

3:15 p.m.

Conclude and depart for Skirvin Plaza
1 Park Avenue
(Driving Time: 20-25 minutes)

3:35 p.m.

Arrive Hotel - STAFF TIME

4:35 p.m.

Depart for the home of Mr. and Mrs. Harvey Everest
7414 N. Country Club Drive
(405) 232-0960
(Driving Time: 20-25 minutes)

NOTE: Harvey Everest is Chairman-Emeritus, Liberty National Bank

5:00 p.m.

Arrive for cocktails and buffet dinner

NOTE: - 100 attending
- Secretary may be called upon to make brief remarks
- Very informal gathering
- Mingle affair

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

6:35 7:00 p.m.

Depart for Oklahoma airport

(Driving Time: 25 minutes)

7:30 7:30 p.m.

Arrive Airport and Wheels Up for
Jacksonville with Garland and
Secret Service

Pilot: Capt. Sullivan - Co-Pilot: First
Tail No: N302EJ Officer Williams
Flight Time: 2 hours, 30 minutes
Time Charge: +1

11:00 11:00 a.m.

Arrive Jacksonville International Airport
AirKanan (904) 757-2201
Enroute to Robert Meyer Hotel
315 Julia Street
(904) 355-4411 (Driving Time: 25 minutes)

NOTE: - Suite 2001-1000 Reserve for
Secretary
- 1 single reserve for staff

SATURDAY, APRIL 24
(Jacksonville, Fla.)

8:50 a.m.

Depart for Jacksonville University
New Administration Building
University Boulevard
(Driving Time: 15-20 minutes)

9:10 a.m.

Arrive for WJC-TV Interview

9:15 a.m.

Interview Begins

9:45 a.m.

Conclude and depart for Dr. Spiro's office
3rd floor for robing

10:30 a.m.

Line-up at Founders Building and
procession to the Science Green (outdoors)

11:00 a.m.

Secretary Simon introduced by Dr. Robert
Spiro, President, Jacksonville University

Begin Remarks (30 minutes)

NOTE: Secretary will be presented with
honorary degree by Dr. Guy
Member, Board of Directors, Chair-
man of the Board of Barnett Banks
of Florida Inc. - Dr. of Civil Law
Degree

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

11:30 a.m.

Conclude remarks and diplomas are
presented to graduating class -
approximately 325 graduates

12:30

12:00 NOON

Program concludes

12:45

12:15 p.m.

Depart for airport
(Driving time: 25-30 minutes)

1:30

12:45 p.m.

Arrive airport and wheels up for
Washington with Garland and
Secret Service

$$\begin{array}{r} 125 \\ 125 \\ \hline 250 \end{array}$$

Pilot: Capt. Sullivan - Co-Pilot: First
Tail No: N302EJ Officer Williams
Flight Time: 2 hours, 15 minutes

3:07

3:00 p.m.

Arrive Page Airways

78040010853

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF CENTRAL COUNSEL

BUSINESS MEETING
Thursday, April 22
9:15 a.m.

Mr. Robert Sellers
Chairman, Cities Service Company

Mr. Leonard Eaton
President, Bank of Oklahoma

Mr. William Martin
Chairman, Phillips Petroleum Company

Mr. Robert Miller
Executive Vice-President, Skelly Oil Company

Mr. Charles Waidelich
President, Cities Service Company

Mr. Jack Bates
Chairman, Reading and Bates

Mr. George Nolley
Board of Directors Cities Service and
First of Tulsa

Mr. John Robertson
Chairman, First of Tulsa

Mr. Ken Olinger
Vice Chairman, First of Tulsa

78040010855
FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

KMTV (CBS) - 7401 North Kelly, Oklahoma City

KTUL-TV (ABC) - Lookout Mountain, Tulsa

KTEW (NBC) - 3701 South Peoria, Tulsa

WKY-TV (NBC) - 500 East Britton Road

Tulsa World - 315 South Boulder Avenue

Robert Lorton, President and Owner (may show up)

Baron Boone, Publisher

Sid Steen, Executive Editor

Walter Bircup, Editor of Editorial Page

Phil Desjard, Associate Editor

Alex Adwan, Associate Editor

Oklahoma City Oklahoman - 500 North Broadway,
and Oklahoma City Times

Charles Bennett, Executive Editor, both newspapers

John Currey, Editorial writer, Oklahoman

Leonard Jackson, Editorial writer, Oklahoman

James Lange, Editorial cartoonist, both papers

James Standard, Managing Editor, both newspapers

Edward Gaylord, Editor and Publisher (may show up)

Jerry Poole, Chief Editorial Writer, Oklahoman

Mr. Poole notes that he was an Assistant Secretary for Congressional
Affairs at H&W under the Nixon administration.

Rochester Democrat & Chronicle - 55 Exchange Street
and Rochester Times-Union

John Quinn, Vice President, News, Gannett Corporation

Bob Logue, Business Editor, Democrat & Chronicle

Pat Boyle, Business Editor, Times-Union

Read Kingsbury, Editorial Page Editor, Times-Union

Dan Hall, Editorial Writer, Times-Union

Fred Eliason, Editorial Writer, Times-Union

Desmond Stone, Editorial Writer, Democrat & Chronicle

Elizabeth Knight, Editorial Writer, Democrat & Chronicle

Myrna Goldstein, Editorial Writer, Democrat & Chronicle

John Dougherty, Managing Editor, Times-Union

Rich Tuttle, Managing Editor, Democrat & Chronicle

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

CONTACTS:

Rochester, N.Y.

Chairman's Club reception and press conference--
Mr. Starkweather, Executive Director, Monroe County
Republican Cmte. (716) 546-8040

Better Business Bureau luncheon
Robert Hildreth, President (716) 546-6770

University of Rochester
Peggy Griffiths (716) 275-2525

Joliet, Ill.

Reception & Dinner
Susan Bryant-225-3635

(In Joliet, Ill.)
Margaret Kerr - (815) 727-1718

Tulsa, Oklahoma

Business Meeting and Tulsa Chapter of National
Association of Business Economists
Peter Jedel (918) 586-4191

Luncheon - Tulsa Club
Jack Black (405) 329-2400

Tulsa University
Paschal Twyman, President (918) 932-6381

Oklahoma City, Oklahoma

Oklahoma City Chamber of Commerce
Paul Strausbaugh (405) 232-6381

Cocktails and Buffet dinner
Jack Black (405) 329-2400

Jacksonville, Fla.

Jacksonville University commencement
Robert Spiro, President (904) 714-3950

Executive Jet Service Dispatch
(614) 237-0363

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040010859

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

ELLIOT L. RICHARDSON
FT. WAYNE, INDIANA
APRIL 8, 1976

THURSDAY, APRIL 8

3:45p

Depart National Airport via Federal
Airways Charter jet (chartered by PFC)
Page Airways, General Aviation Terminal,
w/Horace Webb

Pilot: Alex Mack
Tail No. 9207 N

CONTACT: Page Terminal (ask for operations)
National Airport
Phone: 783-5488

approx.
5:15p

| Arrive Ft. Wayne Municipal Airport (Baerfield)

CONTACT: Doug Shindler
Ft. Wayne Air Service
Phone: 219/747-3108

| Change into black tie - airport facilities
(if you do not change on the plane)

You will be met by:
Don Cox, PFC Indiana Chairman
Orvas Beers, Allen County Republican Chairman
Mayor Robert Armstrong of Ft. Wayne
Mac Parker, President, Greater Ft. Wayne
Chamber of Commerce

You will be driven to a PFC Reception in
the Mayor's car with the Mayor and driver --
and possibly Beers or Cox. The others will
follow in a second car.

approx.
5:35p

Arrive PFC Reception, Summit Club

CONTACT: Irene DeCarlo
Summit Club
2500 Ft. Wayne National Bank Tower
Phone: 219/742-5371

Attendance: 400

NOTE: SEE SEPARATE BINDER FOR PFC BRIEFING MATERIAL

2000 F

OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

ELLIOT L. RICHARDSON
FT. WAYNE, INDIANA
APRIL 8, 1976

PAGE 2

THURSDAY, APRIL 8 (CONT'D.)

You will be introduced by Don Cox or
Orvas Beers

ELR - brief remarks on Ford candidacy

Audience: PFC contributors, key people
and Allen County Republicans

Reception: Mix & mingle / NO reception line

6:30p > ~~Depart Summit Club w/ Beers, Cox & Parker~~
~~for Allen County Memorial Coliseum Chamber~~
Dinner. (Also accompanied by Horace Webb)

6:45p Arrive Allen County Coliseum, 2400 Parnell
Street, Fort Wayne

CONTACT: Don Myers
Manager
Allen County Memorial Coliseum
Phone: 219/748-1102

6:59p Head Table Guests will meet in Room 134
of the Coliseum

SEE TAB C FOR HEAD TABLE LIST

Fort Wayne Chamber of Commerce, 100th Annual
Dinner - SEE TAB B FOR BACKGROUND INFORMATION

PROGRAM:

7:01 Welcome and Call-to-Order by Dinner MC,
Hilliard Gates, Vice Pres. and Gen. Mngr.,
of WKJG TV (NBC affiliate)

Invocation - Reverend John Wolf, First
Wayne Street United Methodist Church

7:04 Dinner

7:49 Hilliard Gates will introduce
Mayor Robert Armstrong for welcome speech

7:54 Hilliard Gates will introduce Head Table

7:57 All Directors will be introduced as a
group

RECEIVED BY COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

7804001086

THURSDAY, APRIL 8 (CONT'D.)

PROGRAM (CONT'D.)

- 7:59 Introduction of Past Presidents
- 8:04 Introduction of 1975 President,
Jerry Heller
- 8:07 Jerry Heller - recap highlights of 1975
introduction of staff, and presentation
of special award for Outstanding
Committee Chairman for 1975. Make
presentation to 2nd annual "MAN OF
THE YEAR AWARD"
- 8:22 Hilliard Gates will introduce 1976
President, Maclyn T. Parker
- 8:24 Mr. Parker will present to Mr. Heller
plaque and issue 1976 challenge.
- 8:36 Hilliard Gates to recognize Annual
Meeting Committee and thank the
Shrine Band for the music
- 8:39 You will be introduced by Hilliard
Gates
- 8:42 ELR - present E awards - followed by
speech

SEE TAB E FOR "E AWARD" PRESENTATION REMARKS

SEE TAB F FOR SPEECH (Chamber of Commerce)

ELR - speech

▷ 15 minutes

Audience: 1400

Q&A (15 mins.) including questions from
the press

- 9:20 ELR has photos taken with "E" Award
recipients

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040010861

ELLIOT L. RICHARDSON
FT. WAYNE, INDIANA
APRIL 8, 1976

PAGE 4

THURSDAY, APRIL 8 (CONT'D.)

9:30p Depart Coliseum enroute to airport with
Beers, Cox, Parker and Webb

9:50p Arrive Ft. Wayne Municipal Airport

9:55p Depart Ft. Wayne via Federal Airways
charter flight

Pilot: Alex Mack
Tail No. 9207 N

FLYING TIME: 1 hour, 25 minutes

11:20p Arrive Washington National Airport
Met By: John Scott

CONTACT: National Airport
Page Terminal (ask for operations)
Phone: 783-5488

7804001086

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

THE PRESIDENT FORD COMMITTEE

AUTHORIZATION TO INCUR EXPENSES OR OBLIGATE FUNDS

Advance authorization is required from the Office Manager of the Campaign Committee or the Executive Director of the Finance Committee to incur expenses or obligate funds, whether or not the item is in the approved budget plan. Use this form for other than fixed administrative costs such as rent and utilities.

DATE NEEDED	PURPOSE	ESTIMATED AMOUNT
4/1/76	Charter Flight -- Elliot Richardson -- Round Trip D.C. - Ft. Wayne, Indiana Check payable to: Federal Airways Corporation General Aviation Terminal National Airport Washington, DC. 20001 Please return check to Grace Tyler $\phi 16$ $\sqrt{17073}$ Pd - 3/31/76 - ck - 1353 7070 - 11,444.68	\$1,444.68
	TOTAL ESTIMATED COST:	

REQUESTED BY: _____

APPROVED BY: W. J. [Signature]

DATE: _____

DATE: 3/31/76

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

3/30

73040010861

10.70M MURKIN CD-02-040216

78040010863

RECEIVED ELECTRON COMMUNICATIONS
GENERAL FILE
OFFICE OF GENERAL COUNSEL

ELLIOT L. RICHARDSON
LOS ANGELES, CALIFORNIA
MAY 10-11, 1976

MONDAY, MAY 10

5:30p Depart Dulles Airport - TW#19 (non-stop)
(EDT) w/Dinner
Secretary, Perry

FLIGHT TIME: 5 hours, 10 minutes

TIME CHANGE: -3 hours

7:40 Arrive Los Angeles International Airport
(PDT)

You will be met by Bob Shepherd, Director,
Office of Energy Policy & Programs (DOC, Wash.)
Ray Wright, API, Director, Refining Division.

Proceed enroute to Century Plaza Hotel

DRIVING TIME: approx. 25 minutes

8:10p Arrive Century Plaza Hotel, Avenue of the Stars, Los Angeles *1658-1660*
(PDT)

RON: Century Plaza Hotel
CONTACT: Chris Perry
Avenue of the Stars
Los Angeles, California
PHONE: 213/277-2000

FLR Am #1 757-59
CLP
1656

TUESDAY, MAY 11

Begin PFC
7:30a

Depart Century Plaza Hotel with Tim Bashford,
PFC, Bob Boyle, PFC Press, and Travis Reed
enroute downtown (via Express Lane)

DRIVING TIME: approx. 30 minutes

8:00a Arrive Biltmore Hotel, 515 South Olive Street,
Los Angeles

Proceed to Gold Room - President Ford Committee
Business Task Force Breakfast

CONTACT: Biltmore Hotel
515 South Olive Street
Los Angeles, California
PHONE: 213/624-1011

Ad 7/6/76 #4308
TYL

OFFICE OF THE SECRETARY
U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C. 20545

ELLIOT L. RICHARDSON
LOS ANGELES, CALIFORNIA
MAY 10 - 11, 1976

PAGE 2

TUESDAY, MAY 11 (CONT'D.)

Johnny Grant, L.A. Radio personality will
be Master of Ceremonies

approx.
8:20a
(PDT)

Attorney General Younger will introduce you
for brief remarks on economy, stock market, etc.

Dave Liggett, PFC California Coordinator, will
speak briefly on Ford campaign in California

9:10a
(PDT)

Depart Biltmore Hotel for Century Plaza
w/Tim Bashford, Tom Boyle, CP

DRIVING TIME: approx. 30 minutes

9:40a
(PDT)

Arrive Century Plaza Hotel, Avenue of the Stars

Proceed to California Level, Los Angeles Room
and assemble with other API participants at
Head Table

SEE TAB B - API BACKGROUND MATERIAL

CONTACT: Chris Perry
Century Plaza Hotel
Avenue of the Stars
Los Angeles, California
PHONE: 213/277-2000

10:00a
(PDT)

F. D. Dennstedt, Exxon Company, will preside
General Session, Midyear Refining Meeting of
the American Petroleum Institute, Los Angeles
Room, Century Plaza Hotel

Seating will be on a
raised platform with a podium in the center.
Head Table will consist of:

ELR

Mr. F. D. Dennstedt, Exxon Company

Mr. E. G. Jefferson, E. I. duPont
de Nemours & Co., Inc.

Mr. Ray Wright, Secretary, API Meeting

PFC

end PFC

7804001087

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Ref. 7/6/76 - 1504

ELLIOT L. RICHARDSON
LOS ANGELES, CALIFORNIA
MAY 10 - 11, 1976

PAGE 3

TUESDAY, MAY 11 (CONT'D.)

10:10a
(PDT)

Mr. E. G. Jefferson will speak for approximately
25 minutes

You will be introduced by F. D. Dennstedt

10:45a
(PDT)

ELR - speech - SEE TAB ^C
30 minutes
followed by few Q&As
Audience: approx. 1,000

11:25

Meeting adjourns

Proceed to Encino Room, Century Plaza Hotel

11:30a
(PDT)

Encino Room - Press Conference

11:50a
(PDT)

Depart Century Plaza Hotel PROMPTLY enroute
downtown. You will be driven by Tim Bashford,
PFC Coordinator.

DRIVING TIME: 30 minutes

12:20p

Arrive Los Angeles Club, 10101 Wilshire Boulevard

You will be met by Joyce Valdez, Finance Director,
Golden Circle of California

You will be escorted by Joyce Valdez to
Golden Circle of California reception (in progress)

12:30p

Golden Circle of California Luncheon
Los Angeles Club, 10101 Wilshire Boulevard

SEE TAB ^D - HEAD TABLE LIST

CONTACT: Los Angeles Club
10101 Wilshire Blvd.
Los Angeles, California
PHONE: 213/381-7011

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

*not PFC
Calif. Republican
Party*
P. 7/6/76 #4304

ELLIOT L. RICHARDSON
LOS ANGELES, CALIFORNIA
MAY 10 - 11, 1976

PAGE 4

• TUESDAY, MAY 11 (CONT'D.)

Chuck Reed, Republican National Committeeman
will preside

You will be introduced by Chuck Reed

approx.

1:10p
(PDT)

ELR - speech
15 minutes
Q & A - 20 minutes
Audience: 67

1:45p

Luncheon adjourns

1:50p

Depart Los Angeles Club, driven by Tim Bashford
enroute to Los Angeles Times Office, Times
Mirror Square, 202 W. First Street, Los Angeles

DRIVING TIME; 10 minutes

2:00p
(PDT)

Editorial Board Meeting with the Los Angeles
Times

SEE TAB E - LIST OF PARTICIPANTS

CONTACT: Anthony Day
Los Angeles Times
202 W. First Street
PHONE: 213/625-2345

2:45p

Editorial Board Meeting concludes.
Depart for airport, driven by Tim Bashford

DRIVING TIME: approx. 30 minutes

3:30p

Arrive Los Angeles International Airport

3:45p
(PDT)

Depart Los Angeles - AA#110 (non-stop)
w/Dinner
Secretary, Perry

FLIGHT TIME: 4 hours, 54 minutes

TIME CHANGE: +3 hours

11:39p
(EDT)

Arrive Dulles International Airport

You will be met by John Scott

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Start PFC
End PFC
PA 7/1/76 #4304

78040010870

7/12/74
4308

ISSUED BY: TW

TRAVEL WORLD AIRLINES INC TW

PASSENGER TICKET AND BAGGAGE CHECK PASSENGER'S COUPON

5854004337

DATE AND PLACE OF ISSUE

NAME OF PASSENGER: RICHARD BOW/ MR. E WASHINGTON-I

NOT TRANSFERABLE

DATE OF ISSUE: 7/12/74

TO: WASHINGTON-I

FROM: 10

CAR: 018

FARE CALCULATION:

1	2	3	4
1	2	3	4

NOT GOOD FOR PASSAGE

FARE BASIS: F

ALLOW: 1

CARRIER: TW

FLIGHT CLASS: 1

GATE: 1

TIME: 1

STATUS: 1

AGENCY: 1

FORM OF PAYMENT: 1

ENDORSEMENTS: 1

FARE: 332.50

TAX: 42.50

TOTAL: 375.00

ROUTE CODE: 01

5854004337 6

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

7 8 0 4 0 0 4 0 8 7 1

Handwritten: D. M. Mc

Handwritten: #438

MICHAEL JONKEL IOTT, MR.
CENTURY FLORA HOTEL AVENUE OF THE STARS, WASHINGTON, D.C.
1 ONE BEDROOM SUITE \$100.00
MON TUE WED THU FRI SAT SUN
GUARANTEED ARRIVAL HOLD

NANCY FULLERTON
AMERICAN PETROLEUM INSTITUTE
2101 L STREET N.W.
WASHINGTON D.C. 20036

Certified Reservation

WESTERN INTERNATIONAL HOTEL
Reservations made by phone or mail

This is your Reservation Confirmation. We will hold your room for you until 6 p.m. A deposit or prepayment is required for reservations made by phone or mail.
Any change in your reservation should be made prior to 6 p.m. or your stated arrival time. In continental U.S. call toll free number 800-228-3000.

**FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL**

Handwritten: Not paid for
room according
to Richardsons
office 6-22-76
J. Wolfe

307 -02 -070776

57.00 = 010

THE PRESIDENT FORD COMMITTEE
EXPENSE REIMBURSEMENT REPORT

PERIOD FROM: _____ TO: _____

NAME: ELLIOT L. RICHARDSON SECRETARY OF COMMERCE I.D. NO: _____

ADDRESS: DEPARTMENT OF COMMERCE

CITY: WASHINGTON STATE: DC ZIP: 20030

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

TRAVEL AND OTHER EXPENSES

DATE	DESTINATION AND PURPOSE		TRANSP. EXPENSES			LODGING	MEALS	OTHER EXP. Explain on Rev.		TOTAL	
	FROM	TO	PURPOSE	MILES	AMOUNT			AMOUNT			
6-22-76	REIMBURSEMENT FOR TIME SPENT [@ 3 HOURS]									57	00
	ON PFC FUNCTIONS DURING OFFICIAL										
	TRIP TO LOS ANGELES, MAY 10-11, 1976										
	[SEE BACK]										
	MAKE CHECK PAYABLE TO DEPARTMENT OF										
	COMMERCE AND MAIL TO (200607)					1090					
	MISS JOAN LEWIS					4304	1/6/76				
	U.S. DEPARTMENT OF COMMERCE RM. 5855					57.00					
	ONE CONSTITUTION AVE. NW										
	WASHINGTON DC 20030										

CERTIFIED CORRECT PAYMENT OR CREDIT HAS NOT BEEN RECEIVED.

TOTAL EXPENSES	57 00
CASH ADVANCES	
BALANCE	57 00

(SIGNATURE OF PAYEE)

REPORT CHECKED BY: Timothy J. Austin DATE: 6/24/76

APPROVED BY: AGC 6/24 DATE: 6/24

REIMBURSED CHECK NO: 7762-6/24

EXPENSE RECEIPTS ATTACHED ☐

OTHER EXPENSES

[illegible]

78040010874

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

ELLIOT L. RICHARDSON
MILWAUKEE, WISCONSIN
MIDLAND, MICHIGAN
MAY 13-14, 1976

THURSDAY, MAY 13

3:30p
(EDT)

Depart National Airport - NW121 (one-stop, 2 stops)
Secretary, Ripley

FLIGHT TIME: 2 hours, 47 minutes

TIME CHANGE: -1 hour

5:17p
(CDT)

Arrive Milwaukee, Wisconsin - Billy Williams report

You will be met by
Ody J. Fish, Republican National Committee
George Parker, Republican State Chairman
Mike Borden of the Wisconsin Republican Party
w/limo

Proceed enroute to Pfister Hotel - 424 East
Wisconsin Avenue

DRIVING TIME: 35 - 38 minutes

5:40p

Arrive Pfister Hotel, 424 East Wisconsin Ave

Proceed to ROOM 1205 (if needed personal time
in hotel)

5:55p

Founders Reception
(5:00-6:30p) for contributors of a minimum of
\$500.00 annually to Republican Party of Wisconsin,
Pfister Hotel, Cafe Rouge

You will be met by Reed Coleman, Chairman of the
Founders Club and Bill Messinger, State Finance
Chairman.

Reed Coleman will introduce you to the members
and introduce you for BRIEF REMARKS

CONTACT: Tony Ripley
Pfister Hotel
424 East Wisconsin Avenue
Milwaukee, Wisconsin
PHONE: 414/273-8222

6:25p

Depart Pfister Hotel w/TR and George Parker
Mike Borden will drive - enroute to Milwaukee
Arena

2-6-6-11 H

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

ELLIOT L. RICHARDSON
MILWAUKEE, WISCONSIN
MIDLAND, MICHIGAN
MAY 13-14, 1976

PAGE 2

THURSDAY, MAY 13 (CONT'D.)

6:30p Arrive Milwaukee Arena, 500 West Kilbourn Street

Proceed with George Parker to Conference Room II

6:30 -

6:55p
(CDT)

Press Conference - Conference Room II,
Milwaukee Arena

CONTACT: Tony Ripley
Milwaukee Arena
500 West Kilbourn Street
PHONE: 414/271-5420

SEE TAB B - PPC BACKGROUND

6:55p

Proceed with George Parker - to meet with
other Head Table Guests - Milwaukee Arena

7:00p

Wisconsin Republican Finance Committee's 2nd
Dinner, Milwaukee Arena

SEE TAB C - HEAD TABLE GUESTS

CONTACT: Tony Ripley
Milwaukee Arena
PHONE: 414/271-5420

PROGRAM

Introduction of Head Table - by George W. Mead II
Dinner Chairman and Master of Ceremonies

Color Guard

Pledge of Allegiance

National Anthem

Retiring of the Colors

Invocation

7:30p

Dinner

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

7804001087

ELLIOT L. RICHARDSON
MILWAUKEE, WISCONSIN
MIDLAND, MICHIGAN
MAY 13-14, 1976

PAGE 1

THURSDAY, MAY 13 (CONT'D.)

8:07p
(CDT)

Introduction of State Chairman, George Parker
by George W. Mead II

Introduction of William C. Messinger, State
Finance Chairman by George Parker

Introduction of Ody Fish, National Committeeman
by William C. Messinger

approx.
8:20p

You will be introduced by Ody Fish, National
Committeeman

ELR - SPEECH
20 minutes

Press will be in audience

8:55p

Depart Milwaukee Arena - Enroute to Billy Mitchell
Airport, Mitchell Aero Terminal
w/TR, George Parker and Mike Jordan

9:15p
(CDT)

Arrive Billy Mitchell Airport, Mitchell Aero
Terminal

9:25p
(CDT)

Depart Airport via 8-passenger Prop Jet
chartered by the Republican Party of Wisconsin
(from Wisconsin Cetrifugal Company)

TAIL #M57169

PILOTS: Tom Maher
Herbert Busby
PHONE: KM70623

FLIGHT TIME: 40 minutes

TIME CHANGE: +1 hour

approx.
11:05p
(EDT)

Arrive Tri City Airport, Midland, Michigan
You will be met by Mike Forcash, AA to Congressman
Cederberg and driven to the Ramada Inn.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040010877

ELLIOT L. RICHARDSON
MILWAUKEE, WISCONSIN
MIDLAND, MICHIGAN
MAY 13-14, 1976

PAGE 4

THURSDAY, MAY 13 (CONT'D.)

RON: Ramada Inn
CONTACT: Tony Ripley
2914 W. Midland Road
Midland, Michigan
PHONE: 517/496-2770

FRIDAY, MAY 14

7:00a Wake up

7:30a Cederberg Breakfast, Great Hall, Ramada Valley
Plaza Complex
Mike Forgash or Congressman Cederberg will meet
you and escort you across the parking lot from
the hotel to the Great Hall

CONTACT: Tony Ripley
Great Hall
Ramada Valley Plaza Complex
PHONE: 517/496-2280

SEE TAB F - HEAD TABLE LIST
PROGRAM

Ned Arbury - Master of Ceremonies

Pledge of Allegiance

Invocation

approx.

8:15a

(EDT)

You will be introduced by Congressman Cederberg

ELR - REMARKS

15 minutes

Q&A

9:00a Conclusion of breakfast

9:15a Press availability - Great Hall

CONTACT: Tony Ripley
Great Hall
PHONE: 517/496-2250

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040010873

ELLIOT L. RICHARDSON
MILWAUKEE, WISCONSIN
MIDLAND, MICHIGAN
MAY 13-14, 1976

PAGE 3

FRIDAY, MAY 14 (CONT'D.)

9:40a

PROMPTLY
Depart Valley Plaza Complex for Tri-City
Airport with TR and Mike Forqash

DRIVING TIME: approx. 20 minutes

10:05a

Arrive Tri-City Airport

approx.
10:10a

Depart Tri-City Airport via charter plane
(chartered by Cong. Cederborg's office, i.e.
Air Flight Serv-a-Plane) Latco

TAIL #56D / PILOTS: Ray Wastus, Don Price

CONTACT: Tri-City Airport
PHONE: 517/833-2514

FLIGHT TIME: 50 minutes

11:15a

Arrive Detroit City Airport, Main Terminal

You will be met by Don Thurber
and driven to Thurber residence, 10 Rathbone
Place, Grosse Pointe, Michigan

DRIVING TIME: approx. 12 minutes

11:30a

Arrive Thurber residence

CONTACT: Tony Ripley
Thurber Residence
10 Rathbone Place
Grosse Pointe, Michigan
PHONE: 313/886-3135

A tennis game has been arranged for you with
Hudson Mead (lawyer). Mr. Mead will pick you
up - enroute to Country Club of Detroit,
Grosse Pointe, Michigan

CONTACT: Country Club of Detroit
PHONE: 313/881-8800

NOTE: TR and Don Thurber will depart enroute
downtown

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

7804001087

ELLIOT L. RICHARDSON
MILWAUKEE, WISCONSIN
MIDLAND, MICHIGAN
MAY 13-14, 1976

PAGE 6

FRIDAY, MAY 14 (CONT'D.)

12:45p Return to Thurber residence to change

1:00p Thurber Residence - small lunch - Hudson and
Frances Mead, Peggy Thurber
CONTACT: Thurber Residence
PHONE: 313/836-313

1:25p Depart Thurber residence enroute downtown
Detroit. Hudson Mead will drive
DRIVING TIME: approx. 20 minutes

1:45p Arrive Pontchartrain Hotel, 2 Washington Blvd.
You will be met by TR and John Hartwell (a
Congressman Marv Esch's district office) and escorted to hotel room (reserved in Mr.
Hartwell's name)

1:45 -
2:55p Pontchartrain Hotel - Press Conference
NOTE: Don Thurber will bring you all necessary
material as it becomes available.
CONTACT: Tony Ripley
Pontchartrain Hotel
2 Washington Blvd.
Detroit, Michigan
PHONE: 313/965-0200

3:00p Press Conference - Pontchartrain Hotel, Ontario
Rooms A & B (SEE TAB G - N.B. MATERIAL)

4:00p Depart Pontchartrain Hotel with TR and Don
Thurber enroute to Detroit Metropolitan Airport
DRIVING TIME: approx. 40 minutes

4:50p Depart Detroit Metropolitan Airport - NW-362
Secretary, TR
FLIGHT TIME: 1 hour, 14 minutes

6:04p Arrive Washington National Airport
You will be met by John Scott

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040010880

78040040881

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

PFC
gpy
EX. I

ELLIOT L. RICHARDSON
BIRMINGHAM, ALABAMA
MEMPHIS, TENNESSEE
LITTLE ROCK, ARKANSAS
APRIL 28-29, 1976

WEDNESDAY, APRIL 28

7:55a
(EDT)

Depart National Airport - DL#125 (non-stop)
w/Breakfast
Secretary, Webb

FLYING TIME: 1 hr., 28 mins.

9:28a
(EDT)

Arrive Atlanta, Georgia

LAYOVER TIME: 49 mins.

SEE TAB B - COMMERCE RELATED ISSUES, ATLANTA

You will be met by Tom Beebe, Chairman of the
Board, Delta Airlines
Dick Heffner, Sec. Rep., Atlanta
Dave Williamson, Director, DIBA Field Office
Atlanta

9:45a.
(EDT)

Proceed to Delta Group Room 7 - for Press
Conference - SEE TAB C - PRESS RELEASE

CONTACT: Frank Seaton
Passenger Service Rep., Delta
Atlanta, Georgia
PHONE: 404/762-2206

10:17a
(EDT)

Depart Atlanta - DL#827
Secretary, Webb

FLYING TIME: 38 minutes

TIME CHANGE: -1 hour

9:55a
(CDT)

Arrive Birmingham, Alabama

SEE TAB B (pages 2 & 3) COMMERCE-RELATED ISSUES
ALABAMA

NOTE: SEE SEPARATE PFC BRIEFING BOOK ON ALABAMA

You will be met by John Scott, PFC Legal Counsel
John is a graduate of Cumberland Law School
and is an attorney in Birmingham

Proceed via car to Samford University

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

ELLIOT L. RICHARDSON
BIRMINGHAM, ALABAMA
MEMPHIS, TENNESSEE
LITTLE ROCK, ARKANSAS
APRIL 28-29, 1976

PAGE 2

WEDNESDAY, APRIL 28 (CONT'D.)

DRIVING TIME: approx. 30 mins.

10:30a
(CDT)

Arrive Samford University

SEE TAB E - LETTER OF INVITE & BACKGROUND
ON SAMFORD UNIVERSITY

CONTACT: Horace Webb
Office of Dr. Leslie Wright, President
Samford University
PHONE: 205/870-2728

You will be taken to the Fine Arts Center
where a state-wide press conference will
be held.

11:00a
(CDT)

Fine Arts Center - Auditorium

You will be introduced by Ben Brown, Chairman
of the Board of Trustees of Samford University
and President, Birmingham Rotary Club

Address the entire student body, Cumberland
Law School (they share the same campus), and
the general public

ELR - brief speech on President Ford and
his Administration
20 minutes

11:30a

Depart Samford University w/HSW and Ben Brown
enroute to the Daniel Building (downtown
Birmingham).

DRIVING TIME: approx. 20-25 mins.

12:00p

Arrive Rotary Club, Daniel Building, 9th Floor

CONTACT: Horace Webb
Office of Ben Brown, President
Birmingham Rotary Club
PHONE: 205/321-3390

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

ELLIOT L. RICHARDSON
BIRMINGHAM, ALABAMA
MEMPHIS, TENNESSEE
LITTLE ROCK, ARKANSAS
APRIL 28-29, 1976

PAGE 3

WEDNESDAY, APRIL 28 (CONT'D.)

12:00 noon
(CDT)

Birmingham Rotary Club Luncheon

SEE TAB F LETTER OF INVITE / BACKGROUND

SEE TAB G HEAD TABLE LIST

Informal, Buffet-style, however, Ben Brown, J. Craig Smith and you will be served at the head table.

PROGRAM:

12:35 Ben Brown, President, will open the meeting / brief remarks

Invocation - Rev. Sterling Edwards,
South Highlands Presbyterian
Church, Birmingham

Pledge of Allegiance

Ben Brown, general Rotary Club announcer

Informal introduction of guests by
Ben Brown

Introduction of Head Table / followed
by introduction of J. Craig Smith,
Chairman of the Board, Avondale Mills

You will be introduced by J. Craig Smith

(Standing Podium)

ELR - "Business Man's Role in Today's
Complex Society"

25 mins.

Audience: 300-350

Q & A (if time allows)

NOTE: Press will attend

1:20 Closing remarks by Ben Brown and
adjournment of meeting

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

7804001088

7/15/76
4667

ELLIOT L. RICHARDSON
BIRMINGHAM, ALABAMA
MEMPHIS, TENNESSEE
LITTLE ROCK, ARKANSAS

PAGE 4

WEDNESDAY, APRIL 28 (CONT'D.)

1:30p Depart Birmingham Rotary Club enroute to
PFC Headquarters via car. You will be
accompanied by Mildred Anne Lee and
Charles Chapman, Co-Chairmen for the State, (PFC)
(They will attend Rotary Club luncheon)

DRIVING TIME: 15 mins.

1:45p Arrive PFC Headquarters, 2024-26 6th Ave., North

CONTACT: Mildred Anne Lee
State Chairman
PFC Headquarters
PHONE: 205/324-6637

ELR - brief remarks / mingle with
PFC volunteers, staff, delegates, etc.

2:15p Depart PFC Headquarters enroute to Birmingham
Southern College via car. You will be driven
by John Scott, PFC

DRIVING TIME: approx. 25 mins.

2:40p Arrive Birmingham Southern College

You will be met by Dr. Neal Berte, President
(and personal friend of David Mathews).

SEE TAB H - BACKGROUND INFORMATION

CONTACT: Horace Webb
Office of Dr. Neal Berte, Pres.
Birmingham Southern College
PHONE: 205/328-5250

Brief reception at the Stockham Women's
Building (first building on the left as you
come through main college gates, 8th Ave., West)
with Board of Trustees, President of the student
body, leaders on the campus.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

ELLIOT L. RICHARDSON
BIRMINGHAM, ALABAMA
MEMPHIS, TENNESSEE
LITTLE ROCK, ARKANSAS
APRIL 28-29, 1976

PAGE 5

WEDNESDAY, APRIL 28 (CONT'D.)

3:00p

Munger Auditorium

You will be introduced by Dr. Neal Berte,
President

ELR - brief remarks

Audience: entire student body (840) and
faculty

3:30p

Depart Munger Auditorium enroute to airport
You will be driven by John Scott, PFC

DRIVING TIME: approx. 30 minutes

4:37p
(CDT)

Depart Birmingham, Alabama - SO#218 (non-stop)
Secretary, Webb

FLYING TIME: 43 mins.

5:20p
(CDT)

Arrive Memphis, Tennessee

There will be a greeting party at the airport:
Jim Watson, President, Memphis and Shelby

County Bar Association

Rudi Scheidt, President, American Cotton
Shippers Association

Wayne W. Pyeatt, President, Memphis Chamber
of Commerce

Sam Hollis, Incoming President, Memphis Chamber
of Commerce

Roy Stewart, Public Relations, Memphis Chamber
of Commerce

You will proceed with Jim Watson via car enroute
to the Hilton Inn, (suite reserved for R&R)

DRIVING TIME: approx. 15-20 mins.

SEE TAB B (pages 4, 5) - COMMERCE-RELATED ISSUE

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL
TENNESSEE

28040010835

7/15/76
#4267

ELLIOT L. RICHARDSON
BIRMINGHAM, ALABAMA
MEMPHIS, TENNESSEE
LITTLE ROCK, ARKANSAS
APRIL 28-29, 1976

PAGE 6

WEDNESDAY, APRIL 28 (CONT'D.)

5:50p Arrive Hilton Inn, Democrat & Airways,
proceed to suite

5:55 -
7:20p

R & R / DRESS FOR MEMPHIS & SHELBY COUNTY
OPTIONAL - MAJORITY NOT IN BLACK TIE
CONTACT: Horace Webb
Hilton Inn
Democrat and Airways
Memphis, Tennessee
PHONE: 901/332-1130

7:25p

SEE TAB J INVITATION - MEMPHIS & SHELBY COUNTY
BAR ASSOCIATION
You will be escorted from suite to VIP
Reception by Jim Watson, Pres., Memphis &
Shelby County Bar Association

7:30p

Join VIP Reception (in progress - 7:00-8:00)
Nonconnah Ballroom, Hilton Inn

7:55p

Line-up for Head Table

SEE TAB K HEAD TABLE LIST

PROGRAM

Jim Watson, President, will call on
Reverend Charles Carter

Invocation - Rev. Charles Carter

Dinner, Memphis & Shelby County Bar Assoc.
Law Day Dinner

Jim Watson will introduce Arnold Lindseth,
Law Week Committee Chairman

Arnold Lindseth will introduce Head Table
(deleting key people)

Arnold Lindseth will call on Jim Watson to
make Liberty Bell Award (community service award)
to John Bassett*

*in Mr. Bassett's absence (not definite as of 4/28/76) his award will
be accepted by Mike Storen (former Mayor of Memphis)

OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

ELLIOT L. RICHARDSON
BIRMINGHAM, ALABAMA
MEMPHIS, TENNESSEE
LITTLE ROCK, ARKANSAS
APRIL 28-29, 1976

PAGE 7

WEDNESDAY, APRIL 28 (CONT'D.)

PROGRAM (CONT'D.)

Arnold Lindseth will introduce Lamar Alexander
(ran for Governor in Tennessee, last election,
and lost)

Lamar Alexander - brief remarks. You will be
introduced by Mr. Alexander

ELR - speech - SEE TAB L
25 mins.
Audience: 600

approx.
9:30p

Arnold Lindseth - closing remarks

NOTE:

Memphis & Shelby County Bar Association
Annual Law Day Dinner concludes followed by
dance (optional) -- Rudi Schiedt and Wayne Pyea
(Memphis Chamber of Commerce) will have attended
the dinner -- and are able to drive you to
the Hyatt Regency immediately following dinner
meeting / or / should you desire to stay, they
will drive you whenever you are ready.

RON: Hyatt Regency, Suite #2610
939 Ridgelake Blvd.
Memphis, Tennessee
Contact: Horace Webb
PHONE: 901/761-1234

THURSDAY, APRIL 29

7:30a

Wake up - breakfast in hotel

8:50a

You will be escorted from your suite by
Rudi Scheidt, President, American Cotton Shippers
Association
Proceed to Hyatt Regency, Ballroom for the
Annual Convention of the American Cotton Shippers
Association -- SEE TAB M LETTERS OF INVITE and
BACKGROUND INFORMATION

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

ELLIOT L. RICHARDSON
BIRMINGHAM, ALABAMA
MEMPHIS, TENNESSEE
LITTLE ROCK, ARKANSAS
APRIL 28 - 29, 1976

PAGE 8

THURSDAY, APRIL 29

9:00a
(CDT)

Annual Convention - American Cotton Shippers

PROGRAM - SEE TAB N - DAIS GUEST LIST

Convention called to order

Invocation - Dr. James A. Wax, Temple Israel,
Memphis, Tennessee

Address of Welcome - Andy Alissandratos,
Chairman, City Council, Memphis, Tennessee

Response, Heinz H. Molsen, Jr., Dallas, Texas

Presentations will be made to:

Bob Jackson (retiring), Exec. Vice Pres., ATMI
F. Martin ("Dusty") Rhodes, (retiring) President
of New York Cotton Exchange
Williard Hillis, (retired) ASCS, USDA

Rudi E. Scheidt, President, American Cotton
Shippers Association - will introduce you

approx.
9:45a
(CDT)

ELR - Speech - SEE TAB
30 mins.

PRESENT PRESIDENT'S MESSAGE - FRONT FLAP

Annual address of the President, Rudi E. Scheidt

approx.
10:25-
10:30
(CDT)

Recess - you will be picked up by Roy Stewart
of Lanigan, Inc., Public Relations & Advertising
Agency for the Memphis Area Chamber of Commerce

Proceed enroute to Hilton Inn, Democrat & Airway

10:45a
(CDT)

Hilton Inn - Press Conference - Suite 150
30 minutes

CONTACT: Horace Webb
Hilton Inn
PHONE: 901/332-1130

SEE TAB B (pages 6 & 7) - COMMERCE RELATED ISS

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

THURSDAY, APRIL 29 (CONT'D.)

11:15a
(CDT)

Press conference concludes, proceed to Ballroom, escorted by Roy Stewart, for reception - Memphis Area Chamber of Commerce

SEE TAB P - INVITATION & BACKGROUND INFORMATION

11:45a

Officers, Directors and Special Guests will be escorted to Head Table

SEE TAB Q - HEAD TABLE LIST

PROGRAM

11:50a Wayne Pyeatt, President - Welcoming remarks

Margie Piazza - National Anthem

Marine Color Guard

Sam Hollis, President-elect - Invocation

11:57 Luncheon - Memphis Area Chamber of Commerce

12:37 Wayne Pyeatt will introduce head table and Chamber of Commerce staff

12:48 Wayne Pyeatt will recognize Sidney A. Stewart, 1975 President, Chamber of Commerce (Pres., E. H. Crump & Co., largest insurance company in the country)

12:51 Sidney A. Stewart - remarks

12:54 Sidney Stewart will recognize M. M. Gordon (Jac 1975 Chairman of the Board, Chamber of Commerce (Pres., Gordon Transportation)

12:57 M.M. Gordon - remarks

1:00 Wayne Pyeatt will call for motion approving Chamber of Commerce by-laws

1:04 You will be introduced by Sidney Stewart

NOTE: This is technically the 1975 meeting

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

ELLIOT L. RICHARDSON
BIRMINGHAM, ALABAMA
MEMPHIS, TENNESSEE
LITTLE ROCK, ARKANSAS
APRIL 28-29, 1976

PAGE 10

THURSDAY, APRIL 29 (CONT'D.)

PROGRAM (CONT'D.)

1:07 ELR - SPEECH
20 mins.
followed by 10 mins. Q&A

1:37 Wayne Pyeatt - closing remarks - meeting adjourn

1:50p Depart Hilton Inn - enroute to airport
You will be driven by Roy Stewart, Chamber of
Commerce

DRIVING TIME: 10 mins.

2:00p Arrive Memphis Airport

2:10p Depart Memphis - AA#463 - (non-stop)
(CDT) Secretary, Webb

FLYING TIME: 38 mins.

2:47p
2:48p
(CDT)

Arrive Little Rock, Arkansas

SEE TAB R - COMMERCE-RELATED ISSUES, ARKANSAS

SEE SEPARATE PFC BRIEFING BOOK - ARKANSAS

You will be met by:

Lt. Gov. Joe Purcell, Bill Bowen (NCCJ Dinner
Chairman & Pres., Commercial National Bank,
Little Rock), Steele Hays (NCCJ Chair. of the E
attorney) and Bill Pharr, (NCCJ Regional Dir., Ar
Roger Fortner, Trade Specialist in Charge, DIB
Satellite Office, Little Rock, Arkansas (bio-T)

3:00p

Proceed to third floor, Jack East Room - for
Press Conference

approx.
3:30p

Depart Airport - two cars - enroute to Camelot
Inn

DRIVING TIME: 10 minutes

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

CD-02-072176

17.00 = 016

200607

THE PRESIDENT FORD COMMITTEE
EXPENSE REIMBURSEMENT REPORT

PERIOD FROM: _____

NAME: ELLIOT L. RICHARDSON, SECRETARY OF COMMERCEADDRESS: DEPARTMENT OF COMMERCECITY: WASHINGTONSTATE: DC

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

20030

TRAVEL AND OTHER EXPENSES

DATE	DESTINATION AND PURPOSE		TRANSP. EXPENSES		LODGING	MEALS	OTHER EXP. Explain on Rev.		TOTAL
	FROM	TO	PURPOSE	MILES			AMOUNT	AMOUNT	
7-8-76	INCREMENTAL COST OF MR. RICHARDSON'S			17	00				17 00
	TRIP TO BIRMINGHAM, ALABAMA ON			EXT. CREDITED		2.13			
	BEHALF OF THE PRESIDENT, APRIL 28, 1976			OK TO PAY		2.13			
	(i.e. difference btw cost of trip to			ACCU. F.		70 70			
	from DC to Memphis ^(192.00) and cost of			CH. DATE		467 7/13			
	trip from DC to Birmingham (\$73.00)			AMOUNT		17 00			
	to Memphis (\$36.00) [SEE ATTACHMENTS]								
	MAKE CHECK PAYABLE TO DEPARTMENT								

CERTIFIED CORRECT PAYMENT OR CREDIT HAS NOT BEEN RECEIVED.

TOTAL EXPENSES

17 00

CASH ADVANCES

BALANCE

17 00

(SIGNATURE OF PAYEE)

Kimberly J. [Signature]

DATE: _____

REPORT CHECKED BY: _____

DATE: _____

7/12/76

APPROVED BY: _____

DATE: _____

REIMBURSED CHECK NO: _____

EXPENSE RECEIPTS ATTACHED ☐

78040010893

FEDERAL ELECTION COMMISSION
OFFICIAL FILE GCF
OFFICE OF GENERAL COUNSEL

February 23, 1976

MEMORANDUM

TO: Bob Marik
Dick Mastrangelo

FROM: Bob Visser
Tim Ryan

RE: ALLOCATION OF CAMPAIGN EXPENSES -- ADVOCATES

The Federal Election Commission (FEC) recently issued its proposed regulations for the allocation of campaign expenses. The PFC intends to abide by and follow the Commission's recommendations in this area pending promulgation of final regulations.

Set forth below are the pertinent provisions of the regulations with comment and example, where relevant:

\$107.5 ALLOCATION OF EXPENSE BETWEEN CAMPAIGN AND NON-CAMPAIGN
RELATED TRAVEL

"(a) All expenditures for campaign related travel paid for by a candidate from a campaign account or by his or her authorized committee or by any other political committee shall be reported.

(b) (1) Travel expenditures paid for by a candidate from personal funds, or from a source other than a political committee, shall constitute reportable expenditures if the travel is campaign-related.

(2) Where a candidate's trip involves both campaign-related and non-campaign-related stops, the expenditures allocable for campaign purposes are reportable, and are calculated on the actual cost per mile of the means of transportation actually used, starting at the point of origin of the trip, via every campaign-related stop and ending at the point of origin.

(3) Where a candidate conducts any campaign-related activity in a stop, the stop is a campaign-related stop and travel expenditures made are reportable. Campaign-related activity shall not include incidental contacts.

(c) (1) Where an individual, other than a candidate, conducts campaign-related activities on a trip, that portion of the trip attributed to each candidate shall be allocated on a reasonable basis.

(2) Travel expenses of a candidate's spouse and family are reportable as expenditures only if the spouse or family members conduct campaign-related activities.

* * * * *

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

(e) Notwithstanding (2) above, the reportable expenditure for a candidate who uses government conveyance or accommodations for travel which is campaign-related is the rate for comparable commercial conveyance or accommodation. In the case of a candidate authorized by law or required by national security to be accompanied by staff and equipment, the allocable expenditures are the costs of facilities sufficient to accommodate the party, less authorized or required personnel and equipment. If such a trip includes both campaign and non-campaign stops, equivalent costs are calculated in accordance with paragraphs (b) and (c) above." (Emphasis added).

Emphasis should be placed on the following aspects of this provision:

I. ALLOCATION OF EXPENSES FOR THE PRESIDENT

A. General Rule

When the President conducts any campaign-related activity at a stop, the stop is considered campaign-related and all expenditures must be reported and are attributed to the respective PFC expenditure limitation.

(1) Incidental political contacts are not considered campaign-related activity (e.g. small, unpublicized political meetings).

B. Transportation Expenses

(1) Interstate transportation expenses for the President which involve both campaign-related and official activity are attributed to the PFC's national expenditure limitation based on the cost-per-mile for comparable commercial transportation or a pro rata share of the Air Force One expenses starting at the point of origin of the trip, via every campaign-related stop, and ending at the point of origin.

(2) All intrastate transportation expenses by the President should be attributed to the individual state's expenditure limitation.

C. Additional Expenses

(1) All other expenses by the President must be attributed to the individual state's expenditure limitation.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

73040010895

II. INDIVIDUALS OTHER THAN THE PRESIDENT

A. General Rule

Individuals other than the President (e.g., advocates), who conduct both campaign-related and non-campaign-related activity at a stop must reasonably allocate their expenses on the basis of the time they spend at campaign-related activity or some other reasonable method of allocation.

B. Transportation Expenses

(1) Interstate transportation expenses by individuals other than the President which involve only campaign-related activity must be attributed in toto to the PFC national expenditure limitation.

(2) Interstate transportation expenses by individuals other than the President which involve both campaign-related and non-campaign-related activity must be reasonably allocated so that a portion of the expenses are attributed to the PFC national expenditure limitation.

(3) Intrastate transportation expenses by individuals other than the President which involve only campaign-related activity must be attributed in toto to the specific state's expenditure limitation.

(4) Intrastate transportation expenses by individuals other than the President which involve both campaign-related and non-campaign-related activity must be reasonably allocated so that a portion of the expenses are attributed to the specific state's expenditure limitation.

C. Additional Expenses

(1) All other campaign-related expenses by individuals other than the President must be attributed to the individual state's expenditure limitation.

III. EXAMPLES OF ALLOCATION OF INTERSTATE TRAVEL EXPENSES

A. Example No. 1

An advocate appears in New York as a speaker, in his official capacity, at a Chamber of Commerce dinner on a Friday. He also represents the President Ford Committee at a Saturday morning fundraising breakfast in Buffalo, New York. Cumulatively, the advocate spends twenty-two hours away from Washington, D. C. participating in both official and PFC activities. The flight from Washington, D. C. to New York City takes one hour; another

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040010895

one hour is spent in flight from New York City to Buffalo, and one hour is spent returning to Washington, D. C. Seven hours are used in New York on official business at the Chamber of Commerce dinner and meetings with local officials. Five hours are spent in Buffalo at the PFC fundraiser. The total cost of the trip for the advocate is \$500, which includes the cost of transportation, meals and a room in New York. Under the aforementioned FEC regulations, a reasonable portion of this trip's expenses must be attributed to the President Ford Committee's national and state expenditure limitations and such expenses must be paid for by the PFC. Since more than 50 percent of the advocate's active time is spent on official business, the flight time between New York City and Washington, D. C. and Buffalo and Washington, D. C. is counted as official time. The following allocations would be appropriate in this hypothetical situation:

1. Direct Cost Method

A. Official

(1)	Cost of airfare: Washington, D. C. to New York and return	\$ 200
(2)	Cost of meals and room in New York City	75
(3)	Cost of ground transportation in New York	<u>25</u>
	Subtotal	\$ 300

B. PFC

(1) National Expenditure Limitation

(a)	Difference, if any, between roundtrip airfare for New York City to D. C. and cost of transportation from Buffalo to Washington, D. C.	\$ 25
-----	---	-------

(2) New York Expenditure Limitation

(a)	Cost of airfare New York City to Buffalo	100
(b)	Ground costs in Buffalo	<u>75</u>

Subtotal \$ 200

\$ 500

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040010892

2. Time Spent Method

(A)	Cost of trip	\$ 500
(B)	Percentage of total time devoted to political activities (6 hours out of 22 hours)	27%
(C)	Total costs attributed to political activities and paid by PFC-27% of \$500	\$ 135
(D)	Total costs attributed to official activities and paid by government -- 73% of \$500	\$ <u>365</u>
	TOTAL	\$ 500

B. Example No. 2

73040010893

An advocate appears in Seattle as a speaker at an official Chamber of Commerce dinner on a Friday night. On Saturday, he participates in a number of PFC events. Cumulatively, the advocate spends thirty (30) hours away from Washington, D. C. participating in both official and PFC activities. The flight takes four hours to Seattle and four hours to return to Washington, D. C. Four hours are spent either at the Chamber of Commerce dinner or in transit to this event. The remainder of the advocate's time is spent at PFC events or on personal time (overnight and other meals). Since over 50 percent of the advocate's time is spent at PFC activity, the time spent in flight is attributed to the PFC. The total cost of the trip is \$1,000, which includes the cost of transportation, meals and a room in Seattle. Under the FEC regulations, a reasonable portion of this trip's expenses must be attributed to the PFC national and state expenditure limitations and such expenses must be paid for by the PFC. The following allocations would be appropriate:

1. Direct Cost Method

(A) Official

(1)	Cost of meal at Chamber of Commerce event	\$ 25
(2)	Transportation to Chamber of Commerce event	<u>75</u>
	Subtotal	\$ 100

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

(B) PFC

(1) National Expenditure Limitation

(a) Cost of airfare \$ 60

(2) Washington State Expenditure Limitation

(a) Cost of meals and room in Seattle 20

(b) Ground transportation and miscellaneous expenses 10

Subtotal \$ 90

2. Time Spent Method

(A) Cost of trip \$1,000

(B) Percentage of total time devoted to political activity (26 hours out of 30) 8

(C) Total costs attributed to political activities and paid by PFC-87% of \$1,000 \$ 87

(D) Total costs attributed to official activities and paid by the government-13% of \$1,000 \$ 13

TOTAL \$1,000

IV. PROCEDURES FOR PAYMENT AND REIMBURSEMENT OF ADVOCATES

If the principal purpose of a mixed official/political trip is official, tickets for transportation should be obtained in the usual manner from the government travel office. If, however, the principal purpose of the trip is political, advocates should contact The President Ford Committee to arrange for appropriate transportation tickets in advance of the trip. All other expenses should be placed on the individual's credit card or the like.

Following any mixed official/political trip or solely political trip, the advocate should forward expense reports to the PFC. This report should contain any expense vouchers and a schedule indicating the relative times spent on political activities and the actual costs involved in such political events. After the PFC has determined the appropriate allocation, reimbursement will be rendered within thirty days.

In conclusion, it must be emphasized that the Hatch Act restrictions apply to most staff assistants working with the

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040010897

various advocates. Accordingly, such individuals should not actively participate in any political activity. If questions exist regarding the allocation of expenses or any other matter in this regard, the General Counsel of The President Ford Committee should be contacted.

78040010900

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040040901

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Ex. K.

President Ford Committee

1111 L STREET, N.W. SUITE 250, WASHINGTON, D.C. 20004 (202) 457-8400

September 28, 1976

MEMORANDUM

FROM: Robert P. Visser, General Counsel *RV*
T. Timothy Ryan, Assistant General Counsel *TR*

RE: ALLOCATION OF CAMPAIGN EXPENSES -- ADVOCATES

78040040902

The Federal Election Commission ("FEC") recently forwarded to Congress its proposed regulations. Section 106 deals with the allocation of campaign expenses. The President Ford Committee ("PFC") intends to abide by and follow the Commission's recommendations in this area pending any action to the contrary by Congress. Accordingly, set forth below are the pertinent provisions of the regulations with comment and example, where relevant:

§106.3 ALLOCATION OF EXPENSE BETWEEN CAMPAIGN AND NON-CAMPAIGN RELATED TRAVEL

"(a) All expenditures for campaign related travel paid for by a candidate from a campaign account or by his or her authorized committee or by any other political committee shall be reported.

* * * * *

(c) (1) Where an individual, other than a candidate, conducts campaign-related activities on a trip, that portion of the trip attributed to each candidate shall be allocated on a reasonable basis.

* * * * *

Emphasis should be placed on the following aspects of this provision:

I. INDIVIDUALS OTHER THAN THE CANDIDATE

A. General Rule

Individuals other than the President, Vice President, Senator Dole (e.g., advocates), who conduct both campaign-related and non-campaign-related activity at a stop must reasonably allocate

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

their expenses on the basis of the time they spend at campaign-related activity or some other reasonable method of allocation.

B. Transportation Expenses

(1) Transportation expenses by individuals other than the President or Senator Dole which involve only campaign-related activity must be attributed in toto to the PFC expenditure limitation.

(2) Transportation expenses by individuals other than the President or Senator Dole which involve both campaign-related and non-campaign-related activity (e.g., official travel) must be reasonably allocated so that an appropriate portion of the expenses are attributed to the PFC expenditure limitation.

C. Additional Expenses

All other campaign-related expenses by individuals other than the President or Senator Dole must be attributed to the PFC expenditure limitation.

II. EXAMPLES OF ALLOCATION OF INTERSTATE TRAVEL EXPENSES

A. Example No. 1

An advocate appears in New York as a speaker, in his official capacity, at a Chamber of Commerce dinner on a Friday. He also represents the President Ford Committee at a Saturday morning campaign-related event in Buffalo, New York. Cumulatively, the advocate spends twenty-two hours away from Washington, D. C. participating in both official and PFC activities. The flight from Washington, D. C. to New York City takes one hour; another one hour is spent in flight from New York City to Buffalo, and one hour is spent returning to Washington, D. C. Seven hours are used in New York on official business at the Chamber of Commerce dinner and meetings with local officials. Five hours are spent in Buffalo at the related event. The total cost of the trip for the advocate is \$500, which includes the cost of transportation, meals and a room in New York. Under the aforementioned FEC regulations, a reasonable portion of this trip's expenses must be attributed to the PFC's expenditure limitation and such expenses must be paid for by the PFC. Since more than 50 percent of the advocate's active time is spent on official business, the flight time between New York City and Washington, D. C. and Buffalo and Washington, D. C. is counted as official time. The following allocations would be appropriate in this hypothetical situation:

73040010903
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

1. Direct Cost Method

A. Official

(1) Cost of airfare: Washington, D.C. to New York and return	\$200
(2) Cost of meals and room in New York City	75
(3) Cost of ground transportation in New York	<u>25</u>
Subtotal	\$300

B. PFC

(1) PFC Expenditure Limitation

(a) Difference, if any, between roundtrip airfare for New York City to D.C. and cost of transportation from Buffalo to Washington, D.C.	\$ 25
(b) Cost of airfare New York City to Buffalo	100
(c) Ground costs in Buffalo	<u>75</u>
Subtotal	<u>\$200</u>

TOTAL \$500

2. Time Spent Method

(A) Cost of trip	\$500
(B) Percentage of total time devoted to political activities (6 hours out of 22 hours)	27%
(C) Total costs attributed to political activities and paid by PFC -- 27% of \$500	\$135
(D) Total costs attributed to official activities and paid by government -- 73% of \$500	<u>\$365</u>

RECONSTRUCTION COMMISSION
OFFICIAL COPY
OFFICE OF CHIEF COUNSEL
TOTAL

\$500

78040010904

B. Example No. 2

An advocate appears in Seattle as a speaker at an official Chamber of Commerce dinner on a Friday night. On Saturday, he participates in a number of PFC events. Cumulatively, the advocate spends thirty (30) hours away from Washington, D. C. participating in both official and PFC activities. The flight takes four hours to Seattle and four hours to return to Washington, D.C. Four hours are spent either at the Chamber of Commerce dinner or in transit to this event. The remainder of the advocate's time is spent at PFC events or on personal time (overnight and other meals). Since over 50 percent of the advocate's active time is spent at PFC activity, the time spent in flight is attributed to the PFC. The total cost of the trip is \$1,000, which includes the cost of transportation, meals and a room in Seattle. Under the FEC regulations, a reasonable portion of this trip's expenses must be attributed to the PFC expenditure limitation and such expenses must be paid for by the PFC. The following allocations would be appropriate:

1. Direct Cost Method

(A) Official

(1)	Cost of meal at Chamber of Commerce event	\$ 25
(2)	Transportation to Chamber of Commerce event	<u>75</u>
	Subtotal	\$100

(B) PFC

(1) PFC Expenditure Limitation

(a)	Cost of airfare	\$600
(b)	Cost of meals and room in Seattle	200
(c)	Ground transportation and miscellaneous expenses	<u>100</u>
	Subtotal	\$900

2. Time Spent Method

(A) Cost of trip

(B) Percentage of total time devoted to political activity (26 hours out of 30)

\$1000

87%

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF LEGAL COUNSEL

(C)	Total costs attributed to political activities and paid by PFC -- 87% of \$1000	\$ 870
(D)	Total costs attributed to official activities and paid by the government -- 13% of \$1000	\$ 130
	TOTAL	\$1000

IV. ACTIVITIES

7 8 0 4 0 0 1 0 9 0 5

In conclusion, it must be emphasized that the Hatch Act restrictions apply to most staff assistants working with the various advocates. Accordingly, such individuals should not actively participate in any political activity. In addition, you should remember that official activities--speeches before non-partisan groups, such as trade, labor or professional associations--must remain non-political. In other words, the advocate's activities at such functions should not appear to involve political activities for the benefit of or on behalf of any Federal candidate. This requirement does not, however, preclude full, fair and open discussion of national issues, current conditions and trends, and existing or proposed administrative or legislative programs which are within the expertise of the Cabinet Member. What it does preclude is advocacy of a candidate for Federal office or making partisan political comment about a candidate or political party.

Questions regarding this memorandum or the legality or propriety of any official, political, or mixed official/political activity should be directed to the office of the Counsel to the President.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040040907

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

6.11.11
Ex. L

President Ford Committee

1628 L STREET, N.W., SUITE 250, WASHINGTON, D.C. 20036 (202) 457-6400

September 8, 1976

MEMORANDUM

TO: The Cabinet
FROM: Jim Baker *J.B.*
RE: Advocate Travel

78040010903

In order to assure an effective Advocate Program and to reduce the possibility of adverse comment, the PFC has decided to simplify the manner in which political events are scheduled and the manner in which the PFC pays for such expenses. For the general election period the following rebuttable presumptions have been established in order to guide both the PFC and the Advocates regarding their travel and payment for related expenses:

1. All public appearances by Cabinet Members after the nomination will be considered candidate related in nature and paid for by the PFC, except those official activities scheduled by the respective Executive Agency prior to August 19, 1976; and
2. All public appearances by Cabinet Members after October 16, 1976, including those official activities scheduled by the respective Executive Agency prior to August 19, 1976, will be considered candidate related in nature and paid for by the President Ford Committee.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

(2) :

Thus, official activities scheduled prior to the date of nomination (August 19, 1976) may remain on the Cabinet Member's official schedule. The previous determination by PFC and White House counsel that it would be appropriate for the PFC to add supplemental political activities to the official schedule once the latter has been established will continue as our policy. The PFC will, of course, pay a reasonable portion of the expenses incurred for such political activity in accordance with previously issued allocation memoranda.

Finally, the PFC Advocate Scheduling Office will forward to your office by the close of business this week a recommended plan regarding your travel during the general election.

78040010900
FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040010910

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

THE WHITE HOUSE
WASHINGTON

October 1, 1976

MEMORANDUM FOR

THE CABINET

SUBJECT: Travel by Advocates

7304001091

In order to assure full compliance with the letter and spirit of the new campaign laws, full responsibility for the Advocates Program has been assigned to the President Ford Committee. In this regard, the following rebuttable presumptions have been established to guide both you and the President Ford Committee through the campaign period with respect to the scheduling of travel by the Advocates and the payment of expenses related thereto:

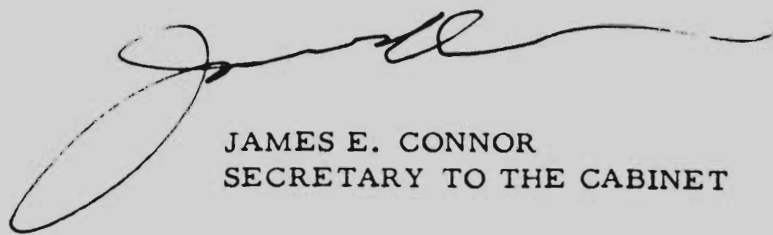
1. All public appearances by the Cabinet members and other government officials who participate in the Advocate Program after the nomination will be considered candidate related in nature, and expenses will be paid by the President Ford Committee, except in the case of official activities scheduled by the respective Agency prior to August 19, 1976; and
2. All public appearances by such Advocates after October 16, 1976, including those official activities scheduled by the respective Agency prior to August 19, 1976, will be considered candidate related in nature and expenses will be paid by the President Ford Committee.

Any questions concerning determinations with regard to whether an activity is official, thereby overcoming the above presumptions, will be answered by the Office of the Counsel to the President.

These guidelines are in no way meant to interfere with the performance of your official duties and responsibilities. However,

FEDERAL ELECTION COMMISSION
CHIEF OF FILE COPY
OFFICE OF GENERAL COUNSEL

as you are aware, the new Federal election laws have placed new constraints upon the conduct of this election. These guidelines have been developed to eliminate even the slightest question of the President's intent to comply fully with the spirit and the letter of that law. Accordingly, we very much appreciate your continued cooperation in this regard.



JAMES E. CONNOR
SECRETARY TO THE CABINET

7804001091

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

No. G53C



FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040040911

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

96

● **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..... 15¢

☒ Show to whom, date, & address of delivery.. 35¢

☐ RESTRICTED DELIVERY.
Show to whom and date delivered 65¢

☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. **ARTICLE ADDRESSED TO:**

Mr. Robert C. Moot

3. **ARTICLE DESCRIPTION:**

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438118	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☒ Addressee ☐ Authorized agent

Signature

4. **DATE OF DELIVERY** **POSTMARK**

1976 *10N 1PV*

5. **ADDRESS** (Complete only if requested)

6. **UNABLE TO DELIVER BECAUSE:** **CLERK'S INITIALS**

GPO 1976-O-203-456

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION

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

24 SEP 1976

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert C. Moot
Treasurer
President Ford Committee
1828 L Street, N. W.
Washington, D. C.

Re: MUR 190 and 198 (76)

Dear Mr. Moot:

This letter is to notify you that, based on the allegations set forth in MUR 190 and that part of MUR 198 which deals with the President Ford Committee's reporting of expenditures for travel by Secretary Simon and Secretary Richardson, your response to those allegations, and available reports and statements, the Federal Election Commission has found reason to believe that violations of 2 U.S.C. §434(b) of the Federal Election Campaign Act of 1971, as amended, have been committed by your Committee.

Under the Act, your Committee has a reasonable opportunity to demonstrate that no action should be taken. Accordingly, please submit any factual or legal materials which you believe to be relevant to the Commission's analysis of the above-captioned matters.

In particular, please submit within ten days the following information for the trips listed on the attached page: the total cost of each trip (including the cost of all personnel and equipment accompanying the named officer), the schedule of activities (including both official and political business) conducted at each stop, the reported cost of each trip (including a reference to the report on which the costs are listed), and a detailed explanation of the allocation formula by which your Committee determined what portion of the total cost of each trip it would report as an expenditure.



FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

- 2 -

In addition, please submit within this ten day period copies of the original records and documents on which this information was maintained.

Sincerely yours,

Signed: John G. Murphy, Jr.

John G. Murphy, Jr.
General Counsel

78040010915

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

ATTACHMENT

List of trips for which information is requested:

1. Secretary Simon's trip to Raleigh, North Carolina on or about January 20, 1976.
2. Secretary Simon's trip to Mississippi, Florida, Mobile, Alabama and Fort Worth, Texas in February (and the exact date of that trip).
3. Secretary Simon's trip to New York on or about March 30, 1976.
4. Secretary Simon's trip to Oklahoma (and the exact date of that trip).
5. Secretary Richardson's trip to Fort Wayne, Indiana (and the exact date of that trip).
6. Secretary Richardson's trip to Los Angeles on or about May 11, 1976.
7. Secretary Richardson's trip to Detroit on or about May 13, 1976.
8. Secretary Richardson's trip to Tennessee and Alabama on or about April 29, 1976.

73040710917

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of the)
President Ford Committee)

MUR 190 (76)
MUR 198 (76)

CERTIFICATION

78040017919
I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on September 21, 1976, the Commission determined by a vote of 5-1 that there was reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended, had been committed in the above-captioned matter. Voting that there was reason to believe were Commissioners Harris, Springer, Staebler, Thomson, and Tiernan; voting that there was no reason to believe was Commissioner Aikens.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of the)
) MUR 190 (76)
President Ford Committee) MUR 198 (76)

GENERAL COUNSEL'S REPORT

I. Allegations

By notarized complaint, Charles H. Breecher (MUR 198 (76)) and Anthony R. Martin-Trigona (MUR 190 (76)) allege that the Ford Committee has understated the campaign related costs of various trips by Commerce Secretary Richardson and Treasury Secretary Simon.

II. Evidence

MUR 190, received July 12, 1976, and MUR 198, received July 22, 1976, were based primarily on information set forth in a news commentary of July 8 by Evans and Novak and complain of the reporting of trips by Secretary of Commerce Richardson and Treasury Secretary Simon. These trips all allegedly involved political activity on behalf of President Ford by the Secretaries, in addition to official business. The complainants claim that the allocation of costs for the political activity was insubstantial.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

By letter of August 10, 1976, the respondent was requested for the trips to "state the total cost of the trip (including the cost of all personnel and equipment accompanying the named Cabinet officer), the amount of the total cost of the trip which the President Ford Committee reported as an expenditure, and the formula which the President Ford Committee used to allocate the total cost of the trip between reportable and non-reportable expenditures."

73040010920
The President Ford Committee responded by claiming that the Commission cannot proceed on a complaint which is based on a newspaper article. The response went on to note that with the exception of Secretary of Commerce Richardson's trip to Indiana on April 1, 1976, the political activity on each trip was minimal, consisting of drop-ins" or receptions that were planned after the official schedule of the Cabinet Member had been finalized. Allocations of cost were based "either on the direct attributable costs incurred for political activity or on a basis of the time spent for political activity during the trips." However, respondent failed to indicate the manner in which this formulation was applied to each of the trips to arrive at the reported costs.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

The amount of the reported costs of the trips are set forth below. With one possible minor exception, which is asterisked, these costs are uncontroverted. Moreover, although the President Ford Committee failed to furnish the total costs of the trips, these are set forth in the table below on the basis of the information in the Evans-Novak column:

<u>Traveler</u>	<u>Date of Trip</u>	<u>Itinerary</u>	<u>Reported Cost</u>	<u>Total Cost</u>
Simon	1/20/76	Raleigh, NC	\$ 17.44	\$ 2,310.00
Simon (2)	2/11/76 2/16/76	Texas, Ala. Florida	444.59*	5,352.26*
Simon	3/30/76	New York	29.01	644.76
Simon	4/21/76-- 4/24/76	Oklahoma	348.67	11,812.00
Richardson	4/01/76	Indiana	1,444.68	1,444.68
Richardson	5/11/76	Los Angeles	57.00	1,162.25
Richardson	4/29/76	Tenn./Ala.	17.00	Not Available

* The Evans-Novak column refers to a trip to Mississippi and Florida which cost a total of \$5,352.26 for which \$243.43 was reported. Complainant refers to an additional trip to Alabama and Texas costing \$7,023.00, of which the President Ford Committee paid \$29.01.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

In conjunction with its review of this MUR, the Office of General Counsel asked the Office of Disclosure and Compliance to verify the reported costs noted above. By memorandum dated July 16, 1976, the Office of Disclosure and Compliance indicated that it was unable to discover on the President Ford Committee reports any of the expenditures described in the Evans-Novak column. Thus, it is unclear whether any of the costs were in fact reported.

III. Legal Analysis

Since respondent concedes that a portion of each of the trips herein were campaign related, the only issue herein involves the reasonableness of the cost allocation.

Section 106.3(c)(1) of the Commission's proposed regulations reflects the Commission's view of how expenses reportable under 2 U.S.C. §434 shall be allocated for an individual other than the candidate who campaigns on a trip that also entails official business.

That regulation provides that "the portion of the trip attributed to each candidate shall be allocated on a reasonable basis." The respondent does not question the reasonable basis standard or its application in this case. However, the Ford Committee has failed to provide any data justifying their allocation.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

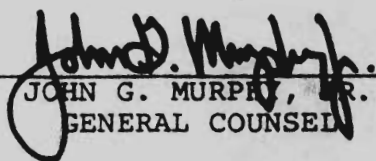
78040010922

78040010923

In view of the admission that Secretaries Simon and Richardson engaged in campaign related activity on the eight noted trips, the respondent's failure to provide any information substantiating their allocations and the minimal amounts so allocated, we recommend that the Commission find reason to believe that the costs were not allocated on a reasonable basis and thus a violation of 2 U.S.C. §434(b) was committed.

IV. Recommendation

Find reason to believe that respondent has committed a violation of 2 U.S.C. §434(b) with respect to the reporting of the costs of the trips named herein; send attached letter.


JOHN G. MURPHY, JR.
GENERAL COUNSEL

DATE: September 15, 1976

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

President Ford Committee

1828 L STREET, N.W. SUITE 250, WASHINGTON, D.C. 20037

611616
JAN 7 10:04

FEDERAL ELECTION COMMISSION
OFFICE OF LEGAL COUNSEL
OFFICIAL FILE COPY

Mr. John G. Murphy, Jr.
General Counsel
The Federal Election Commission
1325 K Street, NW
Washington, D. C. 20463

President Ford Committee

1828 L STREET, N.W., SUITE 250, WASHINGTON, D.C. 20036 (202) 457-6400

CC #500
MUR 198
FEDERAL ELECTION COMMISSION
76 SEP 7
A 9:40

September 3, 1976

John G. Murphy, Jr., General Counsel
The Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

762005

Dear Mr. Murphy:

This letter is in response to your notice that the Federal Election Commission (FEC) had received two complaints against the President Ford Committee (PFC) numbered MUR 190(76) and MUR 198(76). Mr. Robert Moot, the Treasurer of the PFC has responded to that portion of MUR 198(76) dealing with the \$1,000 statutory limitation. Accordingly, this letter is directed solely to that portion of the complaints which deal with the reporting of travel expenditures by individuals other than a candidate.

As you are aware, the complaint filed by Charles H. Breecher of Rehobeth Beach, Delaware, the letter from James R. Creamer of Gloucester, Massachusetts and the complaint of Anthony R. Martin-Trigona are all based on an unsubstantiated newspaper article published on Thursday, July 8, 1976. The complainants have requested that a full investigation by the FEC be carried out in accordance with the Federal election campaign laws. For the following reasons, the PFC believes that the aforementioned complaints should be dismissed forthwith:

(1) The complaints filed under 2 U.S.C. §437g argue that the allocation of costs between official and political activities on the part of Secretary of Commerce Elliott Richardson and Secretary of the Treasury William Simon constitute a violation of the Federal election campaign laws. Your letter states that the Commission presently is conducting a preliminary inquiry into this matter to determine what action, if any, it should take. We submit that neither the Act nor the proposed regulations require the Commission to proceed on the basis of nothing more substantive than a newspaper article.

(2) Assuming, arguendo, that the Federal election campaign laws or the proposed regulations drafted by the Commission require a preliminary inquiry into a matter based on a newspaper

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Mr. John G. Murphy, Jr.
September 3, 1976
Page Two

account, the relevant facts set forth no reason to believe that the PFC has violated the Federal election campaign laws.

Your letter requests that the PFC's response state:

"The total cost of the trip (including the cost of all personnel and equipment accompanying the named Cabinet officer), the amount of the total cost of the trip which the President Ford Committee reported as an expenditure, and the formula which the President Ford Committee used to allocate the total cost of the trip between reportable and non-reportable expenditures for:

1. Secretary Simon's trip to Raleigh, North Carolina on or about January 20, 1976;
2. Secretary Simon's trip to Mississippi, Florida, Mobile, Alabama and Fort Worth, Texas in February (and the exact date of that trip);
3. Secretary Simon's trip to New York on or about March 30, 1976;
4. Secretary Simon's trip to Oklahoma (and the exact date of that trip);
5. Secretary Richardson's trip to Fort Wayne, Indiana (and the exact date of that trip);
6. Secretary Richardson's trip to Los Angeles on or about May 11, 1976;
7. Secretary Richardson's trip to Detroit on or about May 13, 1976; and
8. Secretary Richardson's trip to Tennessee and Alabama on or about April 29, 1976."

Generally, each of the trips noted for the respective Cabinet Member involve official travel and were not, save Secretary Richardson's trip to Indiana, scheduled for political reasons. All of the trips except Indiana were previously

78040010925
FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Mr. John G. Murphy, Jr.
September 3, 1976
Page Three

78040010927

scheduled by the Cabinet Member and President Ford Committee "drop-in's" or receptions were planned after the official schedule of the Cabinet Member had been finalized. In accordance with the applicable regulations, a reasonable portion of the expenses incurred during the trips were allocated to the PFC and were paid for by the PFC. The allocation of costs was based either on the directly attributable costs incurred for political activity or on a basis of the time spent for political activity during the trips. The PFC has testified before the Federal Election Commission with regard to the direct cost or time-spent methods of allocation. Moreover, staff attorneys for the FEC have been aware of this policy followed by the President Ford Committee for a considerable period of time.

In response to your request, the Treasurer of the PFC has provided the following information with regard to payments by the PFC for these trips. This information indicates:

<u>Traveler</u>	<u>Date of Trip</u>	<u>Itinerary</u>	<u>Reported Cost of Trip</u>
Simon	1/20/76	Raleigh	\$ 17.44
Simon (2)	2/11/76	Texas, Alabama	
	2/16/76	Florida	444.59
Simon	3/30/76	New York	29.01
Simon	4/21-24/76	Oklahoma	348.67
Richardson	4/1/76	Indiana	1,444.68
Richardson	5/11/76	Los Angeles	57.00
Richardson	5/13/76	Detroit	N.A.
Richardson	4/29/76	Tenn./Alabama	17.00

The additional information requested is retained by the billing agency and the PFC is unable to provide this material at this juncture. If, of course, the Commission decides that there is reason to believe that the PFC has committed a violation of the Federal election campaign laws, then every reasonable effort will be made to assemble and transmit this data to the FEC.

Sincerely,

Robert P. Visser
Robert P. Visser
General Counsel

T. Timothy Ryan
T. Timothy Ryan
Assistant General Counsel

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION

FOUR SEVENTEEN
WASHINGTON, D.C. 20541

Ms. Jackie A. Goff
Main Justice Department Building - Room 3312
10th and Pennsylvania Ave., N.W.
Washington, D.C.

Re: Anthony Martin-Trigona v.
Gerald R. Ford, et al.,
(D.C. D.C., CA 75-1374)

Dear Ms. Goff:

Attached are the documents from our public records relating to John Haugh and J. Haugh, and Katherine Knox and McCook Knox, which we discussed over the phone.

If you have any questions about the records or their interpretation, our Director of Public Records, Kent Cooper, (352-7012) or someone from his office would probably best be able to assist you.

Please feel free to contact me if you need any further service.

Sincerely yours,

Charles N. Steele
Deputy Assistant

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Charles Steele JJS: 8/11/76

President Ford Committee

1928 L STREET, N.W., SUITE 250, WASHINGTON, D.C. 20036 (202) 457-6400

RECEIVED
FEDERAL ELECTION
COMMISSION

*Partial
Report
Copy*

'76 JUL 9 PM 1:40

July 9, 1976

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

Dear Chairman Thomson:

As Treasurer of The President Ford Committee, I am hereby submitting the required supporting documentation and information, according to the Federal Election Commission regulations, for the report of receipts and expenditures for a political committee. This report covers the period of June 1 through June 30, 1976.

Sincerely,

Robert C. Moot
ROBERT C. MOOT
Treasurer

RCM/nh

Enclosure (2)

- (a) Report of Receipts and Expenditures - Summary
- (b) Computer Run(1)

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 198 (76)
President Ford Committee)
(PFC)) COUNT I (Excess Campaign
Contributions)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 31, 1976, the Commission determined by a vote of 6-0 to close the file as to COUNT I in the above-captioned matter.

Voting to close the file were Commissioners Joan D. Aikens, Thomas Harris, William L. Springer, Neil Staebler, Vernon W. Thomson and Robert O. Tiernan.

Accordingly, the file in this matter has now been closed.

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

780400-10930

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 198 (76)
President Ford Committee)
(PFC)) COUNT I (Excess Campaign
) Contributions)

GENERAL COUNSEL'S REPORT

I. Allegation

This matter was initiated on the basis of a notarized complaint alleging both the receipt of excess contributions and the misreporting of travel expenditures. That part of the complaint which deals with the alleged misreporting of travel expenditures has been consolidated with MUR 190 (76).

Count I of the MUR 198 complaint alleged that three individuals had made aggregate contributions to PFC which exceeded \$1,000.

II. Evidence

Initial review of reports on file with the Commission suggested the possibility that excess contributions had indeed been made, and a preliminary inquiry was instituted by the Commission. In a letter dated August 13, 1976, the Treasurer of PFC responded to the preliminary inquiry indicating that in the case of one alleged excess contribution an

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78940010931

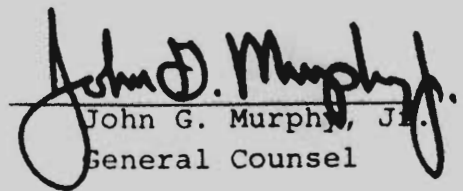
excess contribution had indeed been made but that it had been refunded and would be so reported. In the case of the remaining two alleged excess contributions the respondent indicated complainant had erroneously aggregated contributions which had in fact been made by different individuals -- in one case a father and son who shared the same name, and in the other case, a mother and daughter who shared the same address.

III. Conclusion

Assuming respondent's statements are correct, there is no reason to believe that a violation of the Act has occurred with regard to Count I of MUR 198.

IV. Recommendation

Close file with respect to Count I of MUR 198;
send attached letters.


John G. Murphy, Jr.
General Counsel

DATE:

August 26, 1976

FEDERAL ELECTION COMMISSION
OFFICIAL FILE
OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION

1155 K STREET, N.W.
WASHINGTON, D.C. 20543

AUG 31 1976

Mr. Anthony Martin-Trigona
Suite 2910A
1 IBM Plaza
Chicago, Ill. 60611

Re: MUR 198 (76)

Dear Mr. Martin-Trigona:

This letter is to notify you that the Federal Election Commission has voted to terminate its preliminary inquiry into that part of your complaint which alleges the receipt of excess contributions by the President Ford Committee. The Commission has found no reason to believe that a violation of the Act has occurred with regard to those particular allegations.

In response to our preliminary inquiry regarding the allegation of excess campaign contributions, respondent indicated that with regard to the alleged excess campaign contributions by Ms. Leonard and Mr. Delchamps, you had erroneously aggregated contributions of Mr. Delchamps and his wife and Ms. Leonard and her mother. In the case of Mr. Strom, respondent indicated that the second contribution had been refunded and would be so reported in the August report of receipts and expenditures.

The Commission's inquiry into that part of your complaint which deals with the alleged misreporting of travel expenditures is still pending.

Sincerely yours,

John G. Murphy, Jr.
General Counsel

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

1155 K STREET, N.W.
WASHINGTON, D.C. 20543



FEDERAL ELECTION COMMISSION

1125 K STREET, N.W.
WASHINGTON, D.C. 20541

AUG 31 1976

Mr. Robert C. Moot
Treasurer President Ford Committee
1828 L Street, N.W.
Washington, D.C. 20036

Re: MUR 198 (76)

Dear Mr. Moot:

This letter is to notify you that the Federal Election Commission, relying upon the statements contained in your letter dated August 13, 1976, has voted to close its preliminary inquiry and take no further action with regard to that part of MUR 198 which deals with alleged excess contributions.

The staff member assigned to this matter was David B. Weinberg (telephone no. 202/382-4835).

Sincerely yours,

John G. Murphy, Jr.
General Counsel

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

President Ford Committee

1828 L STREET, N.W., SUITE 250, WASHINGTON, D.C. 20036

By Hand

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

HAND DELIVERED

76 AUG 30 P 3:17

RECEIVED
FEDERAL ELECTION COMMISSION
AUG 30 1976
BY
6-11-76

President Ford Committee

1828 L STREET, N.W., SUITE 250, WASHINGTON, D.C. 20036 (202) 457-6400

CC #470
MUR 190
REC
FEDERAL
COMMISSION
AUG 30
P 3:18

August 30, 1976

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

HAND DELIVERED

RE: MUR ¹⁹⁰190 (76)

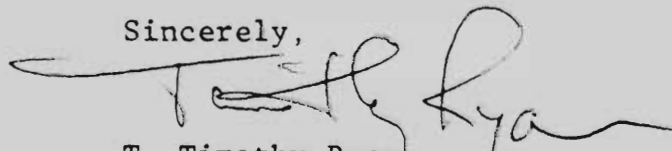
Dear Mr. Spiegel:

This will confirm our recent telephone conversation regarding the above-referenced matter wherein you, as Counsel for the FEC, extended the date for responding to this complaint to September 3, 1976.

Thank you for your assistance in this matter.

Best regards.

Sincerely,


T. Timothy Ryan
Assistant General Counsel

TTR:jr

761862
FEC Correspondence Control #
FEDERAL ELECTION COMMISSION
CENTRAL FILE COPY
DIVISION OF GENERAL COUNSEL

President Ford Committee

1828 L STREET, N.W., SUITE 250, WASHINGTON, D.C. 20036 (202) 457-6400

CC #418
RECEIVED
FEDERAL ELECTION
COMMISSION

76 AUG 19 AID: 39

August 18, 1976

FEC CORRESPONDENCE
CONTROL # 76-1643

John P. Murphy, Esquire
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 190 (76) and MUR 198 (76)

Dear Mr. Murphy:

This will confirm our telephone conversation of last week regarding the above-referenced matter, wherein you, as a General Counsel of the FEC, extended the date for responding to these two complaints to August 30, 1976.

Thank you for your assistance in this matter.

Best regards.

Sincerely,

Robert P. Visser

Robert P. Visser
General Counsel

RPV/alm

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

STREET : A - 700 - 1000 - 200 - 300

11619 00:17

John P. Murphy, Esquire
General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

NO. 100-100000-100000
FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

CC #405

President Ford Committee

1828 L STREET, N.W., SUITE 250, WASHINGTON, D.C. 20036 (202) 457-6400

August 13, 1976 ⁷⁶ AUG 16 A9:38

Mr. John G. Murphy, Jr.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

76-1576

Dear Mr. Murphy:

This letter is in response to your letter of August 10, 1976 in which you notified me of the receipt of two complaints against our committee. Your office has numbered these complaints MUR 198 (76) and MUR 190 (76). The subject of this letter is complaint MUR 198 (76). Complaint MUR 190 (76) will be the subject of separate correspondence.

MUR 198 (76) as a complaint alleges that the following contributors made contributions which in the aggregate exceeded the \$1,000 statutory limitation.

Barbara Leonard	\$1,250
James C. Storm	2,000
O.H. Delchamps	1,200

Barbara Leonard contributed \$250 in March 1976. Her mother, Mrs. Elwood E. Leonard contributed \$1,000 in December 1975. These separate contributions which we have verified as being from different individuals, are not in violation of the law.

James C. Storm contributed \$1,000 in April 1976 and \$1,000 in November 1975. In my letter of August 4, 1976 to Mr. Orlando B. Potter of the Commission, I explained that Mr. Storm did, in good faith, make a second contribution which exceeded the limitation. The contribution has been refunded and will be included in the August Report of Receipts and Expenditures.

O.H. Delchamps, Jr. contributed \$1,000 in June 1975. His father, O.H. Delchamps contributed \$200.00 in March 1976. These separate contributions which we have verified as being from different individuals, are not in violation of the law.

Please advise if any further information is required.

Sincerely yours,

Robert C. Moot
ROBERT C. MOOT
Treasurer

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

RCM/kec

78040010940

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

P.C.

● **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..... 15¢

☒ Show to whom, date, & address of delivery..... 35¢

☐ RESTRICTED DELIVERY.
Show to whom and date delivered..... 65¢

☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery..... 85¢

2. ARTICLE ADDRESSED TO:
Mr. Moot
c/o Ford Comm

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>458134</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

Mark W. Enoch

4. DATE OF DELIVERY POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE CLERK'S INITIALS

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL

10 AUG 1976

RETURN RECEIPT REQUESTED

Mr. Robert C. Moot
Treasurer
President Ford Committee
1828 L St., N.W.
Washington, D.C. 20036

Re: MUR 198 (76)

Dear Mr. Moot:

This letter is to notify you that the Federal Election Commission has received a complaint against your committee, which we have numbered MUR 198 (76). A copy of the complaint is enclosed. That part of the complaint which deals with the alleged misreporting of travel expenditures is the subject of another letter sent to you this date under separate cover. The Commission is forwarding this information to you to apprise you that these matters have been raised; it has made no final determination that the allegations made set forth any violation of the Federal Election Campaign Act of 1971, as amended.

The Commission presently is conducting a preliminary inquiry in this matter to determine what action, if any, it should take. A copy of those portions of your reports which suggest that excess contributions may have been received is attached to facilitate your review of your records to determine what action you will take. If you find that your reporting of these contributions is incomplete or incorrect, please submit a statement giving further information on this matter; if you find that you have accepted excess contributions, the Commission recommends that you return the excess amount to the donor. The return of the excess amount should be reported immediately and should be reflected as an expenditure on your next report of receipts and expenditures.

Under the Act, the Commission must consider this matter expeditiously; accordingly, please submit within ten days



FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

-2-

the aforementioned information, as well as any other factual or legal materials which you believe to be relevant to the Commission's inquiry in this matter.

You will be sent copies or summaries of all correspondence received by the Commission from the complainant regarding this matter. If you have any questions, please do not hesitate to contact us. The staff member assigned to this case is David B. Weinberg (telephone no. 202/382-4055). Please feel free to call if you have any questions regarding this matter. If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

Signed: John G. Murphy, Jr.

John G. Murphy, Jr.
General Counsel

2804001094

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION

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

10 AUG 1976

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Anthony Martin-Trigona
Suite 2910 A
1 I.B.M. Plaza
Chicago, Illinois 60611

Re: MUR 198 (76)

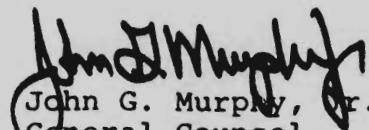
Dear Mr. Martin-Trigona:

This letter is to acknowledge receipt of your complaint dated July 27, 1976, alleging violations of the Federal Election Campaign Act of 1971, as amended, by Gerald R. Ford and the President Ford Committee. We have numbered your complaint as MUR 198; please refer to this number in any correspondence.

The Commission has opened a preliminary inquiry into your allegations. A copy of your complaint has been forwarded to respondent. If you have any other evidence regarding this matter, please submit it within five days.

The staff member assigned to this case is David B. Weinberg (telephone no. 202/382-4055). Please do not hesitate to write or to call if you have any questions.

Sincerely yours,


John G. Murphy, Jr.
General Counsel

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

P.C.

● **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..... 15¢

☒ Show to whom, date, & address of delivery.. 35¢

☐ RESTRICTED DELIVERY.
Show to whom and date delivered..... 65¢

☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438137	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

REASON CHECKED

Undelivered _____

Addressee refused _____

Wrong address _____

No such street _____

CLERK'S INITIALS

78040010943

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

P.C.

● 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..... 15¢
☒ Show to whom, date, & address of delivery.. 35¢
☐ RESTRICTED DELIVERY.
 Show to whom and date delivered 65¢
☐ RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
R.C. Meert
40 PFC

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 438135

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE ☐ Addressee ☐ Authorized agent
Meert W. Enrol

4. DATE OF DELIVERY POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆ GPO 1976-O-203-456

FEDERAL ELECTION COMMISSION
 OFFICIAL FILE COPY
 OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION

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

10 AUG 1976

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert C. Moot
Treasurer
President Ford Committee
1828 L St., N.W.
Washington, D. C. 20036

Re: MUR 190 (76)

Dear Mr. Moot:

7 9 0 4 1 1 0 9 1 5
This letter is to notify you that the Federal Election Commission has received two complaints against your committee, which we have numbered MUR 190 (76) and MUR 198 (76). That part of MUR 198 which deals with alleged excess contributions to your committee is the subject of another letter, sent to you this date under separate cover. A copy of each complaint is enclosed. We have also enclosed two unnotarized letters raising the same issue as the complaints. The Commission is forwarding this information to you to apprise you that these matters have been raised; it has made no final determination that the matters fall within its jurisdiction or that the allegations made set forth any violation of the Federal Election Campaign Act of 1971, as amended.

The Commission presently is conducting a preliminary inquiry into this matter to determine what action, if any, it should take. Under the Act, the Commission must consider this matter expeditiously; accordingly, please submit within ten days the information requested below, as well as any other factual or legal materials which you believe to be relevant to the Commission's inquiry in this matter.

In particular, I would appreciate it if, for each of the trips listed below, you would state the total cost of the trip (including the cost of all personnel and equipment accompanying the named cabinet officer), the amount of the total cost of the trip which the President Ford Committee reported as an expenditure, and the formula which the President Ford Committee used to allocate the total cost of the trip between reportable and non-reportable expenditures:



FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

1. Secretary Simon's trip to Raleigh, North Carolina on or about January 20, 1976.
2. Secretary Simon's trip to Mississippi, Florida, Mobile, Alabama and Fort Worth, Texas in February (and the exact date of that trip).
3. Secretary Simon's trip to New York on or about March 30, 1976.
4. Secretary Simon's trip to Oklahoma (and the exact date of that trip).
5. Secretary Richardson's trip to Fort Wayne, Indiana (and the exact date of that trip).
6. Secretary Richardson's trip to Los Angeles on or about May 11, 1976.
7. Secretary Richardson's trip to Detroit on or about May 13, 1976.
8. Secretary Richardson's trip to Tennessee and Alabama on or about April 29, 1976.

78049010947

You will be sent copies or summaries of all correspondence received by the Commission from the complainants concerning this matter. If you have any questions, please do not hesitate to contact us. The staff member assigned to this case is David B. Weinberg (telephone no. 202/382-4055). Please feel free to call if you have any questions regarding this matter. If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

Signed: John G. Murphy, Jr.

John G. Murphy, Jr.
General Counsel

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

CERTIFIED MAIL

10 AUG 1976

RETURN RECEIPT REQUESTED

Mr. Charles M. Breecher
113 Columbia Ave.
Rehoboth Beach, Delaware 19971

Re: MUR 190 (76)

Dear Mr. Breecher:

This letter is to acknowledge receipt of your notarized complaint dated July 9, 1976, which repeated the allegations contained in an Evans-Novak column of July 8, 1976, regarding the practices of the President Ford Committee. We have numbered your complaint as MUR 190 (76); please refer to this number in any further correspondence.

The Commission has opened a preliminary inquiry into your allegations. A copy of your complaint has been forwarded to respondent. If you have any other evidence regarding this matter, please submit it within ten days.

The staff member assigned to this case is David Weinberg (telephone no. 202/382-4055).

Sincerely yours,

Signature: John G. Murphy, Jr.

John G. Murphy, Jr.
General Counsel

DWeinberg:amh:7/19/76

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

8040010943
16/76

10 AUG 1976

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Mr. Charles H. Breecher
113 Columbia Ave.
Rahoboth Beach, Delaware 19971

Re: MUR 190 (76)

Dear Mr. Breecher:

This letter is to acknowledge receipt of your notarized complaint dated July 9, 1976, which repeated the allegations contained in an Evans-Novak column of July 8, 1976, regarding the practices of the President Ford Committee. We have numbered your complaint as MUR 190 (76); please refer to this number in any further correspondence.

The Commission has opened a preliminary inquiry into your allegations. A copy of your complaint has been forwarded to respondent. If you have any other evidence regarding this matter, please submit it within ten days.

The staff member assigned to this case is David Weinberg (telephone no. 202/382-4055).

Sincerely yours,

Signed: John G. Murphy, Jr.

John G. Murphy, Jr.
General Counsel

DWeinberg:amh:7/19/76

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040010949

10 AUG 1976

Mr. Leon Sillis
119 VanWinkle Avenue
Jersey City, New Jersey

Re: MUR 190 (76)

Dear Mr. Sillis:

Thank you for your letter regarding Messrs. Evans and Novak's column of July 8, 1976, which made several charges regarding the practices of the President Ford Committee. The matter is currently under review by the Federal Election Commission.

Sincerely yours,

Signed: John G. Murphy, Jr.

John G. Murphy, Jr.
General Counsel

b1c: MUR 140

DWeinberg:mpc:7/22/76

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

1 0 AUG 1976

Mr. Leon Sills
119 VanWinkle Avenue
Jersey City, New Jersey

Re: MUR 190 (76)

Dear Mr. Sills:

Thank you for your letter regarding Messrs. Evans and Novak's column of July 8, 1976, which made several charges regarding the practices of the President Ford Committee. The matter is currently under review by the Federal Election Commission.

Sincerely yours,

Signed: John G. Murphy, Jr.
John G. Murphy, Jr.
General Counsel

b1c: MUR 140

DWeinberg:mpc:7/22/76

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION

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

10 AUG 1976

Mr. James R. Creamer
12 Brierwood Street
Gloucester, Massachusetts 01930

Re: MUR 190 (76)

Dear Mr. Creamer:

Thank you for your letter regarding Messrs. Evans and Novak's column of July 8, 1976, which made several charges regarding the practices of the President Ford Committee. The matter is currently under review by the Federal Election Commission.

Sincerely yours,

Signed: John G. Murphy, Jr.
John G. Murphy, Jr.
General Counsel

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



DATE AND TIME OF TRANSMITTAL: August 4, 1976

NO. MUR 190 (76)

REC'D: _____

FEDERAL ELECTION COMMISSION
Washington, D. C.

Complainant's Name: Charles H. Beecher (notarized); [Same issue raised by
Count II of the notarized complaint in MUR 198]; two similar (but unnotarized)
letters also have been received.

Respondent's Name: President Ford Committee

Relevant Statute: 2 U.S.C. Section 434

Internal Reports Checked: PFC Reports Covering the period from 1/1/76 to
6/30/76

Federal Agencies Checked: None

SUMMARY OF ALLEGATION

Repeats allegations contained in the Evans-Novak column of July 8,
1976, that the President Ford Committee has understated the cost
of Commerce Secretary Richardson's and Treasury Secretary Simon's
travel on behalf of President Ford's Campaign.

PRELIMINARY LEGAL ANALYSIS

The information contained in the complaint raises the possibility
of reporting violations by the President Ford Committee. A
thorough examination of reports filed by the President Ford Committee
(See attached Memo) has not revealed any precise statement or
explanation of the alleged travel expenditures. Because of this
lack of precise information in the Committee's reports regarding the

RECOMMENDATION

Open preliminary inquiry; send attached letters.

Date of Next Commission Review: _____

FEDERAL ELECTION COMMISSION
OFFICIAL FILE
OFFICE OF GENERAL COUNSEL

Preliminary Legal Analysis cont.

alleged trips, and because of the possibility of reporting violations, the Commision should request from the President Ford Committee a more detailed statement of its expenditures, if any, for the alleged trips as well as any formula used to determine the portion of the costs of those trips which is reportable as an expenditure.

78040010954

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION

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

July 16, 1976

MEMORANDUM FOR: David Weinberg
THROUGH: Lois Zella^{dz}/Nancy DavisND
FROM: Phil De Lozier^{PD}/Jeff Clark^{JC}
RE: MUR 190 (76)

In response to David Spiegel's July 14, 1976 memorandum to Al Keema, I examined the Reports of the President Ford Committee (January 1, 1976 - June 30, 1976) and did not find the specific expenditures reported which were described in the Evans-Novak column of July 8, 1976.

The line items examined were the following:

- Line 15C - List of Events (Sales and Collections)
- Line 17a - Itemized Refunds, Rebates, etc.
- Line 20a - Itemized Operating Expenditures
- Line 22a - Itemized Fundraising Expenditures
- Line 26 - Debts and obligations owed by the Committee.

It should be noted, however, that the expenditures not in excess of \$100 do not have to be itemized (i.e. alleged trips to North Carolina - \$17.44, New York - \$29.01, and California - \$57.00). Also expenditures reported on Lines 20 or 22 only report the payee, the purpose of the expenditure, date, and amount. The reported purposes of expenditures usually do not include names or events, but only the activity (i.e. "travel and related expenditure", "communication", "supplies", etc.).

Payments by the President Ford Committee to the U.S. Treasury have been reflected in the reports for "travel an related e" and "communication". Also the July 10, 1976 report reflects debts owed by the Committee to the Treasurer of the U.S. for "Air Force One Mission for PFC."



cc Drew McKay

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

FEC ALPHA YTD

PERIOD ENDING: 04/29/76

MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
10017STNE280R1R0BERT	GSTONE	JR	05E	Chrm. 9997	280 PARK AVE	NEW YORK
WEST INDIA SHIPPING CO				ZIP	OCCUPATION	YTD AMT
						25000 10476 25000
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
06890STN4011RIP	USTONEHILL		20B	3309	11 FANTON HILL	WESTON
A BRANCHE & CO		NEW YORK		NY10004	INVESTMENT	25000 10476 25000
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
03704STNR07961GLENN	NSTONER		98R	0595	5079 N MAPOA	FRESNO
RIVER ROCK PRODUCTS		FRESNO		CA93712	CONTRACTOR	100000 10476 100000
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
78401STRM900J1JAMES	CSTORM		025	4400	900 STATE NATL BLDG	CORPUS CHRISTI
				PENDING	100000 10476 100000	
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
72910STPY41931DRVAL	WSTORY		11N	4100	2419 PED ROCK CANYON	EL PASO
STORY LEASING CO		EL PASO		TX79925	BUS. EXECUTIVE	100000 10476 100000
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
10221STTT700M4MARY	LSTOTT		025 20B	3309	700 PARK AVE	NEW YORK
				HOMEMAKER	100000 20376 25000 0476 75000	
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
11765STTT000R4RFBCCA	USTOTT		025 20B	3309	LOWER HORSESHOE RD	WILL NECK
				HOMEMAKER	100000 20376 25000 0476 75000	
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
10021STTT700R1R0BERT	LSTOTT		20R	3309	700 PARK AVE	NEW YORK
WAGNER STOTT & CO		NEW YORK		NY10004	INVESTMENT	100000 10476 100000
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
62521STTT277S1S	RSTOTTRUP		060	8056	277 SOUTHMORELAND	DECATUR
				RETIRED	20000 10476 20000	
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
10025STR5164M1MELVILLE	STRAUS		20B	3309	164 WEST 94TH ST	NEW YORK
WEISS PECK & GREER		NEW YORK		NY10005	CONSULTANT	25000 10476 25000
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
10221STR5229710SCAR	SSTRAUS		7Y 05A	Gen. Partner	228 E 62ND ST	NEW YORK
STRAUS MINERALS		NEW YORK		NY10005	EXECUTIVE	27500 20176 2500 0476 25000
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
19330STR5002G1GEORGE	STRAWBRIDGE	JR	10N	3902	RD 2	COCHRANVILLE
WIDENER COLLEGE		CHESTER		PA19035	EDUCATION	100000 10476 100000
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
40207STR044010	LSTREET		170	1878	44 CALUMET ROAD	LOUISVILLE
				RETIRED	50000 10476 50000	
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
01750STDR770L5LLOYD	STUDEBAKER		12L	9995	2770 MOUNTAIN VIEW DR	LA VERNE
				PENDING	25000 10476 25000	
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY

FEDERAL ELECTION COMMISSION
 OFFICIAL FILE COPY
 OFFICE OF GENERAL COUNSEL

2413

PFC
Oct 31 Report

(Full Name of Candidate or ...)

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

SEE REVERSE SIDE FOR INSTRUCTIONS

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

Date (month, day, year)	Full Name, Mailing Address, and ZIP Code (occupation and principal place of business, if any)	Aggregate Year-to-date (complete if applicable)	Amount of Receipt This Period
6/30/75	O.H. Delchamps, Jr. 116 Pinckney West Mobile, Ala. 36608	President/Delchamps Inc. 305 N. Water St. P.O. Box 1668 Mobile, Ala. 36601 Aggregate Year-to-date \$1,000	\$1,000
7/1/75	W.B. Graham 40 Devonshire Lane Kenilworth Ill.	Chairman & Chief Exec. Officer Baxter Lab., Inc. Deerfield, Ill. 60015 Aggregate Year-to-date \$1,000	\$1,000
6/30/75	R.O. Anderson P.O. Box 1000 Roswell, N.M. 88201	Chairman of Board Atlantic Richfield 515 S. Flower St. L.A. Ca. 90071 -also - Industrialist & Rancher Lincoln County Livestock Co. Roswell, N.M. 88201 Aggregate Year-to-date \$1,000	\$1,000
7/2/75	B.C. Deane 11 Rue Biarritz Newport Beach, CA 92660	Real Estate Developer 500 Newport Center Dr. #815 Newport Beach, CA 92660 Aggregate Year-to-date \$1,000	\$1,000
7/1/75	M.M. Brock 2220 Avenue of the Stars L.A. California 90067	Housewife Aggregate Year-to-date \$1,000	\$1,000
7/1/75	Samuel Broidy Apt. 10-G, Beverly Wilshire Hotel 9500 Wilshire Blvd. Beverly Hills, Ca. 90210	Independent Motion Picture Produc. 9255 Sunset Blvd. #720 L.A. Ca. 90069 Aggregate Year-to-date \$1,000	\$1,000
7/1/75	E.L. Johnson 653 Chaucer Road San Marion, CA 91108	Chairman & President Financial Federation, Inc. 615 S. Flower St., L.A. Ca. 90017 Aggregate Year-to-date \$1,000	\$1,000
7/2/75	B.F. Biaggini, Jr. 1170 Sacramento, St. San Francisco, Cal. 94108	President/Southern Pacific Co. 1 Market St. #859 San Francisco, Ca. 94105 Aggregate Year-to-date \$1,000	\$1,000
7/2/75	John S. Jemison, Jr. 3328 Dell Road Birmingham, Ala. 35223	President/Jemison Invest. Co. 1229 Bank for Savings Bldg. Birmingham, Ala. Aggregate Year-to-date \$250	\$250

FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

TOTAL THIS PERIOD
(Last page of this Part only)

THE ALPHA FILE

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

NO	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
000000	MICHAEL	FLEE		65B NM10		SAN MATEO
EMPLOYER NAME				EMPLOYER CITY	ST ZIP OCCUPATION YTD AMT YTD REP DONATION 1 AMOUNT C M Y DONATION 2 AMOUNT C M Y DONATION 3 AMOUNT C M Y DONATION 4 AMOUNT C M Y	
000000	MICHAEL	FLEE		83B 69C 83A 0900	4600 CONNECTICUT AVE NW 705	WASHINGTON
EMPLOYER NAME				EMPLOYER CITY	ST ZIP OCCUPATION YTD AMT YTD REP DONATION 1 AMOUNT C M Y DONATION 2 AMOUNT C M Y DONATION 3 AMOUNT C M Y DONATION 4 AMOUNT C M Y	
000000	WILLIAM	FLEE		89H 4400	4925 GREENVILLE AVE	DALLAS
EMPLOYER NAME				EMPLOYER CITY	ST ZIP OCCUPATION YTD AMT YTD REP DONATION 1 AMOUNT C M Y DONATION 2 AMOUNT C M Y DONATION 3 AMOUNT C M Y DONATION 4 AMOUNT C M Y	
000000	WILLIAM	FLEECE		99I 1990	523 BEVERLY DR	LAFAYETTE
EMPLOYER NAME				EMPLOYER CITY	ST ZIP OCCUPATION YTD AMT YTD REP DONATION 1 AMOUNT C M Y DONATION 2 AMOUNT C M Y DONATION 3 AMOUNT C M Y DONATION 4 AMOUNT C M Y	
000000	JOHN	FLECK	JR	75C 9997	1960 LIVERPOOL AVE	EGG HARBOR CITY
EMPLOYER NAME				EMPLOYER CITY	ST ZIP OCCUPATION YTD AMT YTD REP DONATION 1 AMOUNT C M Y DONATION 2 AMOUNT C M Y DONATION 3 AMOUNT C M Y DONATION 4 AMOUNT C M Y	
000000	MALANDEW	OUGHTON		84A 3417	1705 HUNTING RIDGE RD	RALEIGH
EMPLOYER NAME				EMPLOYER CITY	ST ZIP OCCUPATION YTD AMT YTD REP DONATION 1 AMOUNT C M Y DONATION 2 AMOUNT C M Y DONATION 3 AMOUNT C M Y DONATION 4 AMOUNT C M Y	
000000	BARBARA	ALEONARD		83B 4000	194 ARLINGTON AVE	PROVIDENCE
EMPLOYER NAME				EMPLOYER CITY	ST ZIP OCCUPATION YTD AMT YTD REP DONATION 1 AMOUNT C M Y DONATION 2 AMOUNT C M Y DONATION 3 AMOUNT C M Y DONATION 4 AMOUNT C M Y	
000000	WILLIAM	ALEONARD		83D 4000	75 FOREST ST	PROVIDENCE
EMPLOYER NAME				EMPLOYER CITY	ST ZIP OCCUPATION YTD AMT YTD REP DONATION 1 AMOUNT C M Y DONATION 2 AMOUNT C M Y DONATION 3 AMOUNT C M Y DONATION 4 AMOUNT C M Y	
000000	ILIJAH	LETICA		58E 99C1	10 ORCHARD LANE	BLOOMFIELD HILLS
EMPLOYER NAME				EMPLOYER CITY	ST ZIP OCCUPATION YTD AMT YTD REP DONATION 1 AMOUNT C M Y DONATION 2 AMOUNT C M Y DONATION 3 AMOUNT C M Y DONATION 4 AMOUNT C M Y	
000000	FREDERICK	JEVISEUR		69H 2200	45 WEST ST	BEVERLY HILLS
EMPLOYER NAME				EMPLOYER CITY	ST ZIP OCCUPATION YTD AMT YTD REP DONATION 1 AMOUNT C M Y DONATION 2 AMOUNT C M Y DONATION 3 AMOUNT C M Y DONATION 4 AMOUNT C M Y	
000000	WILLIAM	JEUKART	JR	89D 99C1	2222 S THIRD ST	COLUMBUS
EMPLOYER NAME				EMPLOYER CITY	ST ZIP OCCUPATION YTD AMT YTD REP DONATION 1 AMOUNT C M Y DONATION 2 AMOUNT C M Y DONATION 3 AMOUNT C M Y DONATION 4 AMOUNT C M Y	
000000	MARTIN	LEVINE		89A 9956	505 BROADMOOR BLVD N	SPRINGFIELD
EMPLOYER NAME				EMPLOYER CITY	ST ZIP OCCUPATION YTD AMT YTD REP DONATION 1 AMOUNT C M Y DONATION 2 AMOUNT C M Y DONATION 3 AMOUNT C M Y DONATION 4 AMOUNT C M Y	
000000	STANLEY	LEVINE		63A 9929	7100 LOCH LOMOND DR	RETHESDA
EMPLOYER NAME				EMPLOYER CITY	ST ZIP OCCUPATION YTD AMT YTD REP DONATION 1 AMOUNT C M Y DONATION 2 AMOUNT C M Y DONATION 3 AMOUNT C M Y DONATION 4 AMOUNT C M Y	

MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY	
24505LGGT301111H	LEGGETT	SR	101675	9200	1101 WAKEFIELD RD	LYNCHBURG	
LEGGETT STORES	LYNCHBURG	3	4	VA2601 CORP.OFFICER	50000 11075 50000	DOI	
77442LHDD072WILLIAM	MEHRER		120975	4400	PO BOX 72	GARWOOD	
PO BOX 72	GARWOOD			TX77442 FARMER	25000 11275 25000	DOI	
7124LMDN044H1HASKELL	LEMON		121075	1701	BOX 2404A	OKLA CITY	
				PENDING	25000 11275 25000	DOI	
02906LNR0194E1FLWOODS	LEONARD	JD	121775	4907	194 ARLINGTON AVE	PROVIDENCE	
H & H SCREW PROD	LINCOLN			71	CORP.OFFICER	100000 11275 100000	DOI
02906LNR0194F4FLWOODS	LEONARD	JD	121775	4900	194 ARLINGTON AVE	PROVIDENCE	
				HOME MAKER	100000 11275 100000	DOI	
62261LSLE601J4J	WESLIE		102975	1400	1601 WESLEY AVE	EVANSTON	
				HOME MAKER	100000 11175 100000	DOI	
62261LSLE601J4J	WESLIE		102975	1400	1601 WESLEY AVE	EVANSTON	
				HOME MAKER	100000 11175 100000	DOI	
10101LVSN56051S	LEVISON		103175	1100	2560 PIERCE DUNWOODY RD NE	ATLANTA	
2700 FIRST NATL BK	ATLANTA			GA 10302 LAWYER	15000 11175 15000	DOI	
10022LEVY00461GUSTAVE	LEVY		070875 110575	3301	A COTTON PLACE	NEW YORK	
GOLDMAN SACHS & CO	NEW YORK			NY 10004 CORP.OFFICER	100000 20775 25000 1175 75000	DOI	
77442LWIS072000	LEWIS		120975	4400	PO BOX 72	GARWOOD	
HIGHWAY 71	GARWOOD			TX77442 FARMER	25000 11275 25000	DOI	
11405LWIS2101J	LEWIS	JR	103075	1100	210 JOHNSTON ST	SAVANNAH	
J C LEWIS ENTERPRISES	SAVANNAH			GA 11406 CORP.OFFICER	100000 11175 100000	DOI	
90219LWIS3994MILTON	LEWIS		122275	0500	190 TROUSDALE PL	BEVERLY HILLS	
				HOME MAKER	100000 11275 100000	DOI	
90219LWIS3994MILTON	LEWIS		122275	0500	190 TROUSDALE PL	BEVERLY HILLS	
THE RALPH M PARSONS CO	PASADENA			CA 91124 CORP.OFFICER	100000 11275 100000	DOI	
0981FLNHR01261G	LIENHARD		101575	1101	12 OAK HILLS RD	EDISON	
ROBERT WOOD JOHNSON FOUNDATION	PRINCETON			NJ 08540 CORP.OFFICER	100000 11175 100000	DOI	
77422LERED001HEDMAN	LIERE		121375	4400	PO BOX 304-L	CYPRESS	
				FARMER	50000 11275 50000	DOI	

78040010962

F.L.C. ALPHA YTD

DATE: 04/06/76

PAGE

FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY	ST	ZIP	OCCUPATION	YTD AMT	YTD REP	DONATION 1 AMOUNT	DONATION 2 AMOUNT	DONATION 3 AMOUNT	DONATION 4 AMOUNT	DONATION 5 AMOUNT
MICHAEL	FLEE		65B	NM10	SAN MATEO				25000	10376	25000			001	25000
MICHAEL	FLEE		93B	69C 93B 0900	4600 CONNECTICUT AVE NW 705	WASHINGTON			37000	40376	5000	0376	3000	0376	9000
WILLIAM	FLEE		89H	4400	4925 GREENVILLE AVE	DALLAS			25000	10376	25000			001	25000
WILLIAM	FLEE		89I	1990	523 BEVERLY DR	LAFAYETTE			50000	10376	50000			001	50000
WILLIAM	FLEE		89J	9997	1960 LIVERPOOL AVE	EGG HARBOR CITY			25000	10376	25000			001	25000
WILLIAM	FLEE		89K	3417	1705 HUNTING RIDGE RD	RALEIGH			20000	10376	20000			001	20000
WILLIAM	FLEE		89L	4000	194 ARLINGTON AVE	PROVIDENCE			25000	10376	25000			001	25000
WILLIAM	FLEE		89M	4000	75 FOREST ST	PROVIDENCE			25000	10376	25000			001	25000
WILLIAM	FLEE		89N	99C1	10 ORCHARD LANE	BLOOMFIELD HILLS			25000	10376	25000			001	25000
WILLIAM	FLEE		89O	2200	45 WEST ST	BEVERLY HILLS			20000	10376	20000			001	20000
WILLIAM	FLEE		89P	99C1	2222 S THIRD ST	COLUMBUS			25000	10376	25000			001	25000
WILLIAM	FLEE		89Q	9956	505 BROADMOOR BLVD N	SPRINGFIELD			20000	10376	20000			001	20000
WILLIAM	FLEE		89R	9929	7100 LOCK LOMOND DR	BEVERLY HILLS			25000	10376	25000			001	25000
WILLIAM	FLEE		89S			PROVIDENCE									

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

[illegible]

PREPARED BY: CREATIVE MAILING CONSULTANTS OF AMERICA, INC. - 8800 EDGEWORTH DRIVE - CAPITOL HEIGHTS, MD. 20027 - PHONE (301) 350-5600

PFC
Oct 31 Report

(Full Name of Candidate or ...)

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

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

Date (month, day, year)	Full Name, Mailing Address, and ZIP Code (occupation and principal place of business, if any)	Aggregate Year-to-date (complete if applicable)	Amount of Receipt This Period
6/30/75	O.H. Delchamps, Jr. 116 Pinebrook West Mobile, Ala. 36608	President/Delchamps Inc. 305 N.Water St.P.O.Box1668 Mobile, Ala. 36601 Aggregate Year-to-date \$1,000	\$1,000
7/1/75	W.B. Graham 40 Devonshire Lane Kenilworth Ill.	Chairman & Chief Exec. Officer Baxter Lab., Inc. Deerfield, Ill. 60015 Aggregate Year-to-date \$ 1,000	\$1,000
6/30/75	R.O. Anderson P.O. Box 1000 Roswell, N.M.88201	Chairman of Board Atlantic Richfield 515 S.Flower St.L.A. Ca. 90071 -also - Industrialist & Rancher Lincoln County Livestock Co. Roswell, N.M. 88201 Aggregate Year-to-date \$ 1,000	\$1,000
7/2/75	B.C. Deane 11 Rue Biarritz Newport Beach, CA 92660	Real Estate Developer 500 Newport Center Dr.#815 Newport Beach, CA 92660 Aggregate Year-to-date \$1,000	\$1,000
7/1/75	M.M. Brock 2220 Avenue of the Stars L.A. California 90067	Housewife Aggregate Year-to-date \$ 1,000	\$1,000
7/1/75	Samuel Broidy Apt.10-G, Beverly Wilshire Hotel 9500 Wilshire Blvd. Beverly Hills, Ca. 90210	Independent Motion Picture Produc. 9255 Sunset Blvd.#720 L.A. Ca. 90069 Aggregate Year-to-date \$1,000	\$1,000
7/1/75	E.L. Johnson 653 Chaucer Road San Marion, CA 91108	Chairman & President Financial Federation, Inc. 615 S. Flower St., L.A. Ca.90017 Aggregate Year-to-date \$1,000	\$1,000
7/2/75	B.F. Biaggini, Jr. 1170 Sacramento, St. San Francisco, Cal. 94108	President/Southern Pacific Co. 1 Market St. #859 San Francisco, Ca. 94105 Aggregate Year-to-date \$ 1,000	\$1,000
7/2/75	John S. Jemison, Jr. 3328 Dell Road Birmingham, Ala. 35223	President/Jemison Invest. Co. 1229 Bank for Savings Bldg Birmingham, Ala. Aggregate Year-to-date \$250	\$250

TOTAL THIS PERIOD
4. (Last page of this Part only)

70040010963

FEC ALPHA YTD

PERIOD ENDING: 04/29/76

MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
10017STNE28001PDRERT	GSTONE	JR 05E		Chrm. 9997	280 PARK AVE	NEW YORK
WEST INDIA SHIPPING CO				NY 10004 INVESTMENT	25000 10476 25000	001
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
06880STV4011RIP	JSTONEHILL	208		3309	11 FANTON HILL	WESTON
LA BRANCHE & CO		NEW YORK		NY10004 INVESTMENT	25000 10476 25000	001
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
03704STNR07961GLENN	NSTONER	98R		0595	5079 N MAPOA	FRESNO
RIVER ROCK PRODUCTS		FRESNO		CA93712 CONTRACTOR	100000 10476 100000	001
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
78401STPM900J1JAMES	CSTORM	92G		4400	900 STATE NATL BLDG	CORPUS CHRISTI
				PENDING	100000 10476 100000	001
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
79910STPY419J107VAL	WSTORY	11N		4100	2419 RED ROCK CANYON	EL PASO
STORY LEASING CO		EL PASO		TX79925BUS.EXECUTIVE	100000 10476 100000	001
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
10021STTT700M4MAY	LSTOTT	92S 20H		3309	700 PARK AVE	NEW YORK
				HOMEMAKER	100000 20376 25000 0476 75000	001
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
11765STTT000R4RFECCA	JSTOTT	92S 20H		3309	LOWER HORSESHOE RD	MILL NECK
				HOMEMAKER	100000 20376 25000 0476 75000	001
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
10021STTT700R1PDRERT	LSTOTT	20H		3309	700 PARK AVE	NEW YORK
MAGNER STOTT & CO		NEW YORK		NY10004 INVESTMENT	100000 10476 100000	001
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
62521STTT277S1S	RSTOTTUP	06D		8056	277 SOUTHMORELAND	DECATUR
				RETIRED	20000 10476 20000	001
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
10025STRS164M1MELVILLE	STRAUS	20H		3309	164 WEST 94TH ST	NEW YORK
WEISS BECK & GREEP		NEW YORK		NY10005 CONSULTANT	25000 10476 25000	001
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
10021STRS228010SCA2	SSTRAUS	7Y 05A		Gen. Partner	228 E 62ND ST	NEW YORK
STRAUS MINERALS		NEW YORK		NY10005 EXECUTIVE	27500 20176 2500 0476 25000	001
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
19330STRW002G1GEORGE	STRAWBRIDGE	JR 10N		3902	RD 2	COCHRANVILLE
WIDENER COLLEGE		CHESTER		PA19035 EDUCATION	100000 10476 100000	001
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
40207STRT04401D	LSTREET	17D		1878	44 CALUMET ROAD	LOUISVILLE
				RETIRED	50000 10476 50000	001
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY
01750ST09770L3LLOYD	STUDEBAKER	12L		9995	2770 MOUNTAIN VIEW DR	LA VERNE
				PENDING	25000 10476 25000	001
MATCH CODE	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY

FEDERAL ELECTION COMMISSION
 OFFICIAL FILE COPY
 OFFICE OF GENERAL COUNSEL

NAME	FIRST NAME	LAST NAME	SUFFIX	EXTRA ADDRESS LINE	STREET ADDRESS	CITY	STATE	ZIP
1021	ALLEN	ASTAUF		120275	1701 102 RIDGECREST	WICHITA	KS	
1022	STEELMAN	STEELMAN		121175	3701 PO BOX 1297	OKLAHOMA CITY	OK	
1023	STEIN	STEIN		112675	2601 D MARY HILL	ST LOUIS	MO	
1024	STEINBERG	STEINBERG		120975	9910 PO BOX 13281	VAIL	CO	
1025	VAIL	VAIL		100175	3549 WENDONAH	DALLAS	TX	
1026	JOHN	STEMMONS		100175	4400 3549 WENDONAH	DALLAS	TX	
1027	JOHN	STEVENS		102475	3109 1691 WOODLAND AVE	EDISON	NJ	
1028	JOHN	STEVENS		102475	3109 1691 WOODLAND AVE	EDISON	NJ	
1029	JAMES	STEWART		102375	4301 4411 CHICKERING LN	NASHVILLE	TN	
1030	COMPANY	BRENTWOOD		102375	4301 4411 CHICKERING LN	NASHVILLE	TN	
1031	JAMES	STEWART		121275	1425 785 5TH AVE	NEW YORK	NY	
1032	CO INC	NEW YORK		121275	1425 785 5TH AVE	NEW YORK	NY	
1033	JOHN	STILES		121575	3460 MARINA CURTIS DR	ALEXANDRIA	VA	
1034	COMM	WASHINGTON		121575	3460 MARINA CURTIS DR	ALEXANDRIA	VA	
1035	DIANE	STOLTZ		120875	9900 2102 NORTH L	MIDLAND	TX	
1036	CORPORATION	MIDLAND		120875	9900 2102 NORTH L	MIDLAND	TX	
1037	HERBERT	STOLZER		111775	3108 10 YORKTOWN RD	EAST BRUNSWICK	NJ	
1038	JOHNSON	NEW BRUNSWICK		111775	3108 10 YORKTOWN RD	EAST BRUNSWICK	NJ	
1039	COLLEEN	STONE		120775	400 UNIVERSITY AVE	PALO ALTO	CA	
1040	JESSIE	STONE		121775	999B 445 SHERIDAN RD	WINNETKA	IL	
1041	W	STONE		121775	5050 N BROADWAY	CHICAGO	IL	
1042	INSURANCE CO	CHICAGO		121775	5050 N BROADWAY	CHICAGO	IL	
1043	JAMES	STORM		111475	823 S WATER	CORPUS CHRISTI	TX	
1044	CO	CORPUS CHRISTI		111475	823 S WATER	CORPUS CHRISTI	TX	

DATE AND TIME OF TRANSMITTAL: AUG 4 1976

NO. MUR 198 (76)

REC'D: 7/22/76

FEDERAL ELECTION COMMISSION
Washington, D. C.

Complainant's Name: Anthony R. Martin-Trigona (notarized complaint)

Respondent's Name: Gerald R. Ford, President Ford Committee

Relevant Statute: 2 U.S.C. Sections 441a(a)(1), 441a(f), 434(b)

Internal Reports Checked: [President Ford Committee] See MUR 190

Federal Agencies Checked: None

SUMMARY OF ALLEGATION

Count I (paragraph V) alleges three surface violations of 2 U.S.C. Section 441a(a)(1) in that aggregate contributions in excess of \$1,000 were received by the President Ford Committee from each of three persons.

Count II (paragraph VI) repeats the allegations contained in MUR 190 (76) regarding the alleged misreporting of Treasury Secretary Simon's and Commerce Secretary Richardson's travel expenditures by the President Ford Committee.

PRELIMINARY LEGAL ANALYSIS

Count I presents the possibility of surface violations of the Act, which should be handled in accordance with the Staff's normal procedure for handling such violations as set forth in part IV of the Memorandum of Understanding on Procedure for Handling Violations of Disclosure Requirements, Commissioner Memorandum #546 (May 26, 1976).

Count II presents the same question of the possibility of a pattern misreporting of travel expenditures as presented in MUR 190, requiring the initiation of preliminary inquiry (to be consolidated with MUR 190).

RECOMMENDATION

OFFICE OF GENERAL COUNSEL

Initiate a separate preliminary inquiry in accordance with

Commission Memorandum #546: Consolidate Count II with MUR 190

Date of Next Commission Review: Send attached letters.



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Mr. Robert C. Moot
Treasurer
President Ford Committee
1828 L St., N.W.
Washington, D.C. 20036

Re: MUR 198 (76)

Dear Mr. Moot:

This letter is to notify you that the Federal Election Commission has received a complaint against your committee, which we have numbered MUR 198 (76). A copy of the complaint is enclosed. That part of the complaint which deals with the alleged misreporting of travel expenditures is the subject of another letter sent to you this date under separate cover. The Commission is forwarding this information to you to apprise you that these matters have been raised; it has made no final determination that the allegations made set forth any violation of the Federal Election Campaign Act of 1971, as amended.

The Commission presently is conducting a preliminary inquiry in this matter to determine what action, if any, it should take. A copy of those portions of your reports which suggest that excess contributions may have been received is attached to facilitate your review of your records to determine what action you will take. If you find that your reporting of these contributions is incomplete or incorrect, please submit a statement giving further information on this matter; if you find that you have accepted excess contributions, the Commission recommends that you return the excess amount to the donor. The return of the excess amount should be reported immediately and should be reflected as an expenditure on your next report of receipts and expenditures.

Under the Act, the Commission must consider this matter expeditiously; accordingly, please submit within ten days



FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

the aforementioned information, as well as any other factual or legal materials which you believe to be relevant to the Commission's inquiry in this matter.

You will be sent copies or summaries of all correspondence received by the Commission from the complainant regarding this matter. If you have any questions, please do not hesitate to contact us. The staff member assigned to this case is David B. Weinberg (telephone no. 202/382-4055). Please feel free to call if you have any questions regarding this matter. If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

John G. Murphy, Jr.
General Counsel

78040010970

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Anthony Martin-Trigona
Suite 2910 A
1 I.B.M. Plaza
Chicago, Illinois 60611

Re: MUR 198 (76)

Dear Mr. Martin-Trigona:

7 3 0 4 0 0 4 0 9 7 1
This letter is to acknowledge receipt of your complaint dated July 27, 1976, alleging violations of the Federal Election Campaign Act of 1971, as amended, by Gerald R. Ford and the President Ford Committee. We have numbered your complaint as MUR 198, please refer to this number in any correspondence.

The Commission has opened a preliminary inquiry into your allegations. A copy of your complaint has been forwarded to respondent. If you have any other evidence regarding this matter, please submit it within five days.

The Staff member assigned to this case is David B. Weinberg (telephone no. 202/382-4055). Please do not hesitate to write or to call if you have any questions.

Sincerely yours,

John G. Murphy, Jr.
General Counsel

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



3
Diamond.
RECEIVED
FEDERAL ELECTION COMMISSION
President Ford Committee

1800 L STREET, N.W., SUITE 250, WASHINGTON, D.C. 20036 (202) 457-6400

76 JUL 28 A 8:57

July 27, 1976

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

C00031336

Attention: Orlando B. Potter
Staff Director

Dear Mr. Potter:

76030234521
7804001097
Your letter of July 19, 1976 asked that we provide additional information relative to our Report of Receipts and Expenditures submitted July 10, 1976. This letter is in response to that request and the following paragraph captions conform to the headings of Page Two of your letter request for additional information.

LINE 15a Schedule A

The contribution records of The President Ford Committee are computerized and contain over 127,000 individual contributions. We have exerted great effort to assure that the records are complete and accurate; at times we have had one or more employees engaged full time in seeking additional information from contributors. The computerized contribution system includes some 75 coded occupation titles which provide definitive information to assure compliance with the law. Some contributors provide only the name of the firm or agency for which they work rather than a specific occupation title. In these cases, we assign the appropriate general title which best relates to the firm or agency listed, such as "Real Estate" or "Government Official". We continue to seek additional information for our files and you will note the prevalence of annotated contributions in our monthly reports which is evidence of our efforts in this regard.

LINE 15C Schedule D

Receipts from fund raising events generally are spread over two or more months. This results from the fact that the response to widespread mail solicitation is not limited to the period preceding the event. Many contributors who are not available at the time of the event subsequently send in a ticket contribution. In addition, short delays in the transmission of checks to the principal campaign committee in Washington sometimes do occur.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Federal Election Commission
Attn: Orlando B. Potter
Staff Director

July 27, 1976

From: Robert C. Moot

LINE 17a Schedule A

Eric H. Rosenberger and Joanne M. Wolfe are White House advance personnel. Grace Marie Prather is a press officer employed by this Committee at 1828 L Street, N.W., Washington, D.C.

LINE 20a Schedule B

"Travel and Related E" covers transportation and living expenses reimbursed to an employee of the Committee or paid directly to the listed vendor who provided the service. "Communications" covers telephone costs, postage, as well as the preparation and mailing of campaign letters. Our future reports will be more specific in categorizing these expenses. "Payroll" covers wage compensation payments to employees of The President Ford Committee. "Outside Services" covers services contracted for from professional firms such as lawyers, political consultants, accountants or management consultants.

"Pres. Reception Costs" and "Pres. Trip Other" cover expenses incurred by individuals in connection with a specific Presidential campaign trip which expenses are being reimbursed by the Committee. "Pres. Aircraft Fund" covers the cost of food and refreshment provided aboard Air Force One and paid for by The President Ford Committee.

LINE 26 Schedule C

The date of the debt owed to Margaret Robison is June 1, 1976.

Sincerely,

Robert C. Moot
ROBERT C. MOOT
Treasurer

RCM/nh

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

July 19, 1976

MEMORANDUM TO: Al Keema

FROM: David Spiegel

On behalf of David Weinberg of our staff, I want to thank you for the prompt and thoroughly professional job done by Phil Delozier and Jeff Clark, of your staff, pursuant to our request for an examination of certain reports in connection with MUR 190.

78040010971

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION

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

July 19, 1976

President Ford Committee
c/o Robert C. Moot
1828 L Street, N.W., Suite 250
Washington, D.C. 20036

Dear Mr. Moot,

This letter is prompted by our interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended.

During review of the July 10, 1976
Report of Receipts and Expenditures, we noticed that you omitted information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within ten (10) days of receipt of this letter. If you have any questions, please do not hesitate to call our Reports Examining Section at (202/382-3484).

Sincerely,

Orlando B. Potter
Staff Director

Attachment

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



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

REQUEST FOR ADDITIONAL INFORMATION FOR A REPORT OF RECEIPTS AND EXPENDITURES FILED
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED

Covering the Period from 6/1/76 through 6/30/76

July 10, 1976 monthly report

DATE: 7/19/76

TO: President Ford Committee
c/o Robert C. Moot
1828 L Street, N.W., Suite 250
Washington, D.C. 20036

I.D.# C00031336

Your report of receipts and expenditures has been received and is hereby acknowledged. A review of the report indicates that additional information is needed in order for the report to be considered complete.

☐ Coverage dates omitted or incorrect ☐ Failure to Sign ☐ Identification Number omitted (use above I.D.#)		☐ Incorrect or omitted total(s) on Summary Page Section <u> </u> Column <u> </u> ☐ Incorrect or omitted total(s) on Detailed Summary Line <u> </u> Column <u> </u>									
OMISSION OF REQUIRED DATA ON RECEIPTS AND EXPENDITURES	Schedule Line	A 15	A 16	A 17	A 18	B 20	B 21	B 23	C 25	C 26	D 15(c)
☐ Schedule totals () do not agree with Detailed Summary (Page 2) ☐ Omitted											
☐ Dates inadequate or omitted											
☐ Full name omitted											
☐ Mailing address inadequate or omitted											
☐ Occupation description inadequate or omitted											
☐ Princpl. pl. bus. inadequate or omitted											
☐ Aggregate year-to-date totals omitted											
☐ Purpose of expenditure or receipt omitted											
☐ Inadequate description of () Proceeds ☐ Dates () Event(s) and Location											
☐ Nature of debts and obligations omitted or inadequate											

OTHER: See page two.

Your initial submission, 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. If you have any questions regarding this request, please call the Reports Examining Division (202-382-3484). Please submit the information required to the above address.

OFFICE OF GENERAL COUNSEL

REQUEST FOR ADDITIONAL INFORMATION
PAGE TWO

COMMITTEE: President Ford Committee

LINE 15a Schedule A

Please provide circumstances for contributions not reported during the period in which they were received.

Each person who has made one or more contributions in excess of \$100 must be identified by full name, mailing address, occupation (principal job title or position), and principal place of business (full name of business and the city in which the person is employed). Self-employed contributors must be identified as such, with type of work or profession and city where self-employed.

Please provide further clarification of the following occupations:

"Bus. Executive"	"Industrial"
"Real Estate"	"Gov Offcl"
"Not Required"	"State Govt"
"US Govt"	"Banking"
"Oil Prod"	

LINE 15C Schedule D

Please provide circumstances for events not reported during the period in which they occurred.

LINE 17a Schedule A

Please provide circumstances for receipts not reported during the period in which they were received.

Please provide the occupation and principal place of business for the following individuals:

"Eric H. Rosenberger"	"Grace Marie Prather"
"Joanne M. Wolfe"	

LINE 20a Schedule B

Please provide further clarification of the following terms:

"Travel and Related E"	"Payroll"
"Communications"	"Pres Reception Costs"
"Outside Services"	"Pres Aircraft Fund"
"Pres Trip Other"	

LINE 26 Schedule C

Please provide the date (month, day, year) of the debt owed to Margaret Robison.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040010977



FEDERAL ELECTION COMMISSION

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

July 16, 1976

MEMORANDUM FOR: David Weinberg
THROUGH: Lois Zella ^{LZ} / Nancy Davis ND
FROM: Phil De Lozier ^{PD} / Jeff Clark ^{JC}
RE: MUR 190 (76)

78040010973
In response to David Spiegel's July 14, 1976 memorandum to Al Keema, I examined the Reports of the President Ford Committee (January 1, 1976 - June 30, 1976) and did not find the specific expenditures reported which were described in the Evans-Novak column of July 8, 1976.

The line items examined were the following:

- Line 15C - List of Events (Sales and Collections)
- Line 17a - Itemized Refunds, Rebates, etc.
- Line 20a - Itemized Operating Expenditures
- Line 22a - Itemized Fundraising Expenditures
- Line 26 - Debts and obligations owed by the Committee.

It should be noted, however, that the expenditures not in excess of \$100 do not have to be itemized (i.e. alleged trips to North Carolina - \$17.44, New York -\$29.01, and California - \$57.00). Also expenditures reported on Lines 20 or 22 only report the payee, the purpose of the expenditure, date, and amount. The reported purposes of expenditures usually do not include names or events, but only the activity (i.e. "travel and related expenditure", "communication", "supplies", etc.).

Payments by the President Ford Committee to the U.S. Treasury have been reflected in the reports for "travel and related e" and "communication". Also the July 10, 1976 report reflects debts owed by the Committee to the Treasurer of the U.S. for "Air Force One Mission for PFC."



cc Drew McKay

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

July 14, 1976

MEMORANDUM TO: Al Keema
FROM: David Spiegel ¹⁵¹
RE: MUR 190 (76) - Urgent (Hand Delivered)

Please have your staff examine the Reports of the President Ford Committee to determine whether the following expenditures have been reported as charged in the attached Evans-Novak column of July 8, 1976:

<u>Amount</u>	<u>Trip</u>	<u>Date</u>
\$ 17.44	Simon to Raleigh, N.C.	1/20/76
243.43	Simon to Mississippi and Florida	February
201.16	Simon from Florida (above) to Mobile, Alabama and Ft. Worth, Texas	February
29.01	Simon to New York	3/30/76
348.67	Simon to Oklahoma	Date?
1,444.68	Richardson to Ft. Wayne, Indiana	Date?
57.00	Richardson to Los Angeles	5/11/76
Reported?	Richardson to Detroit	5/13/76
Reported?	Richardson to Tennessee-Alabama	4/29/76

We need this information within 24 hours.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Attachment

DWeinberg:mpc:7/14/76

7/8/76

CC #301 MUR 190
RECEIVED
FEDERAL ELECTION COMMISSION
FEC CORRESPONDENCE
CONTROL # 76-1017

ATTENTION: DIRECTOR, FEDERAL ELECTION COMMISSION
WASH. D.C.

76 JUL 15

78040010980
CONCERNING THE FRAUD PERPETRATED UPON
THE TAXPAYERS BY MESSRS. SIMON, RICHARDSON
AND THE PRESIDENT FORD COMMITTEE AS EXPOSED
IN EVANS + NUAK COLUMN, THURS. BOSTON GLOBE 7/8/76 A.M.
EDITION: THIS HAS GOT TO STOP!
WHAT KIND OF CRAP IS GOING ON DOWN
THERE?! YOU HAD BETTER PUSH DAMN HARD
ON SOME CORRECTIVE REGULATIONS, OR QUIT TO
SHOW UP CONGRESS AND THE PRESIDENT. IT'S A
FARCE, I TELL YOU! IT'S ONE THING FOR U.S.
CITIZENS TO PAY FOR ^{THEIR} MISTAKES ~~ONCE~~ ONCE
THESE GUYS GET INTO OFFICE, IT'S QUITE
ANOTHER TO MISTAKENLY PAY TO GET THEM
ELECTED! AND PLEASE, SHOW THIS TO
WHOMEVER YOU WANT IF IT WILL HELP.

SINCERELY,

James R. Creamer

12 BRIERWOOD ST.

GLOUCESTER, MA. 01930

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF LEGAL COUNSEL

8040040981

89

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

CREAMER
12 BRIERWOOD ST.
GLOUCESTER, MA.
01930



THOMAS B. CURTIS, CHAIRMAN

~~DIRECTOR~~

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D. C.

20463

Chairman
Federal
Election
Commission

FORGOTTEN NOTHING FROM ONE

CC # 300
MCR 190

CORRUPT ELECTION FINANCING

FREE-LOADING!

WASTE OF TAXPAYER MONEY

JUL 13 12:27

FORGOTTEN NOTHING!

70-1003

NEW YORK POST, THURSDAY, JULY 8, 1976



Evans and Novak

FORD'S FREEBIES

WASHINGTON.

When Treasury Secretary William Simon traveled to Raleigh, N.C., last Jan. 20 to address the state Chamber of Commerce and then a President Ford Committee (PFC) reception, the taxpayers' bill was \$2310. The reimbursement to Uncle Sam from the PFC for political expenses: \$17.44.

That is an example, only slightly more absurd than most, of how obviously political expenses incurred by Simon and other Ford "advocates" are routinely excluded from the stringent \$13 million over-all limit on pre-convention spending by any presidential candidate. Although the advocates have been barnstorming the country in the President's behalf all year, Federal Election Commission (FEC) files yield little in PFC reports of their expenses.

* * *

The miracle of the President's cost-free advocates is part of the Ford campaign's clearest accomplishment: effectively exempting the incumbent from the new federal election law. While the law's tough provisions actually forced some Democratic candidates this year into premature retirement and nearly did in Ronald Reagan as well, Ford has found presidential-sized loopholes.

Starting with Ford's announcement of candidacy last year, his campaign has taken a cavalier attitude toward the new law and the commission assigned to enforce it. Unlike other announced candidates, Ford did not report political travel expenses in 1975 (on grounds he was performing as party head). Accordingly, he did not start spending

against the \$13 million ceiling until 1976.

Even then, Ford's campaign only tardily reported charges by the slow-billing U.S. Air Force for Air Force One—a complaint loudly sounded by Reagan, who along with other candidates had to pay in advance for commercially chartered aircraft. But whereas Air Force One charges eventually will be posted and perhaps even included in the \$13 million limit, the true costs of Ford's cabinet-level advocates will be hidden forever.

The method used for Simon's Jan. 20 journey to North Carolina, an important primary state, is the model. The Air Force charged \$2310 for a Jetstar carrying Simon and seven others (including aides and Secret Service agents) to North Carolina. Since Simon occupied only one of eight seats, his share of the cost is \$288.75. The 30 minutes spent at the PFC reception amounted to only 5 per cent of portal-to-portal time from Washington. So, 5 per cent of \$288.75 is \$14.44. Add \$3 for the share of meal, and the cost to the PFC is \$17.44.

This fabulous arithmetic has enabled Simon, most effective of Ford advocates, to travel throughout the South—where he is more popular than the President—at bargain rates for the PFC.

A February swing through Mississippi and Florida enabled Simon to sing the President's praises in television interviews at two party dinners and two PFC functions at Jacksonville and Orlando. Cost to the government of Air Force and private charter planes: \$5352.36. Charge to the PFC: \$243.43.

The Pentagon in March barred Air Force planes for political travel by

anybody except the President, but the same formula was used for civilian charters. A March 30 flight to New York (where Simon attended a PFC reception) cost \$644.76, with \$29.01 charged to the PFC. A Simon trip to Oklahoma aboard a plane chartered for \$11,812 included television interviews, an editorial board meeting and two PFC receptions all related to the campaign. Cost to the PFC: \$348.67.

Secretary of Commerce Elliot Richardson, Ford's bridge to liberal Republicans, has been only a shade less active than Simon and nearly as cheap for the PFC. The PFC did pay for a \$1444.68 chartered plane trip to Fort Wayne, Ind., but most of Richardson's travels cost the Ford campaign little. He split a day in Los Angeles May 11 between an oil industry meeting and two Ford campaign appearances. But of the total \$1162.25 commercial air travel cost and lodging for Richardson and an aide, only \$57 was charged to the PFC.

* * *

The PFC share of Richardson's Tennessee-Alabama trip back on April 29 (including two PFC receptions) has not yet been computed. Hence, it is not surprising to find no record of the legion of Ford advocates who swarmed into California on the eve of the primary to support Reagan's Republican war talk. In fact, Ford campaign peritiously keeping the \$13 million ceiling, all that activity is designed to generate major reported expenses.

A proposed regulation in the FEC would end all this by establishing two simple rules: first, if there is any campaign activity in a city, all expenses getting there and being there shall be charged to the campaign; second, expenses of everybody accompanying the speaker (excluding Secret Service) shall be charged to the campaign. If not vetoed by Congress, this would go into effect about mid August—in plenty of time for the 1980 primaries.

We taxpayers want an accounting
of these funds. please advise

Ken Aills

FEDERAL ELECTION COMMISSION

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

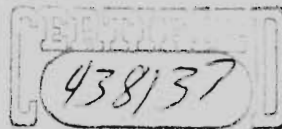
POSTAGE AND FEES PAID



Unclaimed
Addressed to
Insufficient
No such street
No such
Do not return to sender

Mr. Anthony Martin-Trigona
Suite 2910 A
1 I.B.M. Plaza
Chicago, Illinois 60611

CERTIFIED MAIL® - RETURN RECEIPT REQUESTED



7 3 0 4 0 0 1 0 9 8

MUR 198
RECEIVED
FEDERAL ELECTION
COMMISSION

Before the
FEDERAL ELECTION COMMISSION
Washington, D. C. 20463

76 JUL 22 P 3: 36

ANTHONY R. MARTIN-TRIGONA
Suite 2910 A
ONE I.B.M. PLAZA
Chicago, Illinois 60611
(312) 467-6760

Complainant

vs.

GERALD R. FORD

and

PRESIDENT FORD COMMITTEE

Respondents

FILE CORRESPONDENCE
CONTROL # 76-1190

F. E. C. NUMBER _____

COMPLAINT

I

PRELIMINARY STATEMENT

1. This Complaint involves two different types of violations of the Federal Election Campaign Act, as amended. First, the Ford Committee has received contributions from individuals in excess of \$1,000. Second, Ford has improperly reported the travel of his campaigners including Treasury Secretary William E. Simon and Commerce Secretary Elliot L. Richardson.

II

JURISDICTION

2. Jurisdiction is conferred on the Federal Election Commission by 2 U.S.C. Section 437 g.

III

COMPLAINANT

3. ANTHONY R. MARTIN-TRIGONA is a person who believes that a violation of the Federal Election Campaign Act, as amended, has occurred.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

IV

RESPONDENTS

4. GERALD R. FORD is a candidate for President of The United States.

5. The PRESIDENT FORD COMMITTEE is MR. FORD'S principal campaign committee.

V

FIRST CLAIM: Knowing acceptance of contributions in excess of \$1,000 in violation of 2 U. S. C. Section 441 a (f).

6. The PRESIDENT FORD COMMITTEE received on behalf of GERALD R. FORD contributions from Barbara Leonard of Providence, Rhode Island of \$1,000 in December, 1975 and \$250 in February, 1976 which amounts aggregate in violation of the \$1,000 limitation established by 2 U. S. C. Section 441 a (a) (1).

7. The PRESIDENT FORD COMMITTEE received on behalf of GERALD R. FORD contributions from James C. Storm of Corpus Christie, Texas of \$1,000 in December, 1975 and \$1,000 in April, 1976, which amounts aggregate in violation of the \$1,000 limitation established by 2 U. S. C. Section 441 a (a) (1).

8. The PRESIDENT FORD COMMITTEE received on behalf of GERALD R. FORD contributions from O. H. Delchamps of Mobile, Alabama of \$1,000 in June, 1975 and \$200 in March, 1976, which amounts aggregate in violation of the \$1,000 limitation established by 2 U. S. C. Section 441 a (a) (1).

VI

SECOND CLAIM: Failure to properly report the amount of a debt or expenditure for travel in violation of 2 U. S. C. Section 434.

9. On January 20, 1976, Treasury Secretary William E. Simon flew from Washington, D. C. to Raleigh, North Carolina on a U. S. Air Force plane to address a reception for the PRESIDENT FORD COMMITTEE on GERALD FORD'S behalf.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

10. The PRESIDENT FORD COMMITTEE reimbursed the U. S. Treasury \$17.44 as supposed payment in full for the trip described in paragraph 9.

11. The proper charge for air travel from Washington, D. C. to Raleigh, North Carolina is far in excess of \$17.44.

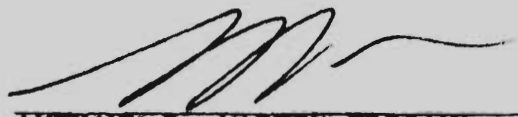
12. Commerce Secretary Elliot L. Richardson made a political appearance in Detroit, Michigan shortly before the Presidential primary in that state, on behalf of PRESIDENT FORD.

13. The PRESIDENT FORD COMMITTEE has not reported any amount for Mr. Richardson's political trip to Detroit, Michigan.

VII

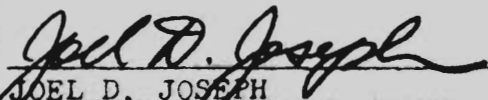
REQUEST FOR RELIEF

14. Complainant requests that the Federal Election Commission order that Respondents return all contributions in excess of \$1,000 from individuals and be fined \$25,000 pursuant to 2 U. S. C. Section 441 j for each violation. Further, Complainant requests that the PRESIDENT FORD COMMITTEE be ordered to properly report and pay for all travel which is political in nature and fine the respondents for these violations.



ANTHONY R. MARTIN-TRIGONA

SUBSCRIBED and sworn to before me this 21ST day of July, 1976.

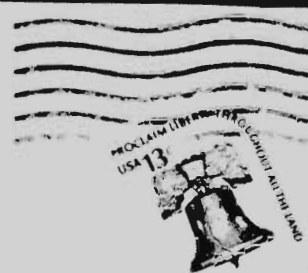

NOTARY PUBLIC

JOEL D. JOSEPH
ATTORNEY FOR COMPLAINANT
Suite 850
Watergate Office Building
600 New Hampshire Ave., N.W.
Washington, D. C. 20037
338-5560

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
Office of General Counsel

7 8 0 4 0 7 1 0 9 8 7

Leon Sills
119 Van Winkle Ave.
Jersey City, N.J. 07310



10 JUL 13 12:06

Chairman

Federal Election Commission

Washington, D.C.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Joy is love
Joy is a smile
Joy is a kind word.
Joy is a lasting peace.
Joy is the work of the Lord.
Joy is a world without worry
Joy is a bouncing, new-born baby
Joy is the song of a chirping sparrow.
Joy is a table of plenty, with freedom from want.
Joy is a life of aid to the poor, the sick, the weary
Joy is a bubbling brook, with tumbling, fresh trout
Joy is a restful night's sleep, filled with drowsy dreams
Joy is the sight of a Christmas tree and sprigs of mistletoe
Joy is life itself

 **ON SILLS**

Post Office Box 6892
Jersey City, N.J. 07306
Phone 201-659-2090

*Extracted from "The Fruits of Joy," an illustrated book
written for children, ages 7 to 11, by an
eternally young and joyous adult!*

Leon Sills

CC # 296

CHARLES H. BREECHER
113 Columbia Avenue
Rehoboth Beach, Delaware 19971
(302) 227-6364

76 JUL 12 AM: 36

9 July 1976

Federal Election Commission
1325 K St. NW
Washington, D.C. 20463

FEDERAL ELECTION COMMISSION
CORRESPONDENCE
76-958

Subj: Initial Information
Complaint of violation

Dear Sirs,

This is a complaint concerning several separate acts constituting each a violation of the Federal Election Campaign Act of 1971, as amended :

1. On 20 January 1976, Secretary of the U.S. Treasury William Simon, traveled to Raleigh, N.C., and addressed the state Chamber of Commerce there and assisted at a President Ford Committee (PFC) reception. The total cost of this travel paid by the U.S. Government was \$2,310-. The President Ford Committee reimbursed the U.S. Government \$17.44 only. This reimbursement is claimed to be completely inadequate.

2. Secretary Simon traveled to Mississippi and Florida in February 1976. He attended there two Republican Party dinners and two PFC functions at Jacksonville, Fla. and Orlando, Fla. The total cost to the U.S. Government of this travel has been reported as \$5,352.26. The PFC reimbursed \$243.43 thereof. I claim that this reimbursement is completely inadequate.

3. Secretary Simon traveled from Florida in February 1976, to Mobile, Ala. and to Forth Worth, Tex. He spoke at PFC events in these cities. Cost to the U.S. Government has been reported as \$7,023. The PFC has reported reimbursing \$20.16 thereof. I claim that this reimbursement is completely inadequate.

4. Secretary Simon traveled on 30 March 1976 to New York City and attended a PFC reception there. Cost to the U.S. Government reported as \$644.76. Reimbursed by the PFC \$29.01

5. In April 1976, Secretary Simon traveled to Oklahoma. He gave television interviews there and attended 2 PFC receptions. Cost to the U.S. Government reported as \$11,812. Reimbursed by the PFC \$348.67. I claim that this reimbursement is completely inadequate.

Page 1 of 2 pages.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF LEGAL COUNSEL

78040010999

CHARLES H. BREECHER
113 Columbia Avenue
Rehoboth Beach, Delaware 19971
(302) 227-6364

6. Secretary of Commerce Elliott Richardson traveled to Los Angeles, Cal. on May 11, 1976. This was 4 weeks before the California Presidential primary. Secretary Richardson made 2 campaign appearances for President Ford then. Cost to the U.S. Government : reported as \$1,1162.25. Reimbursed by the PFC : \$57.-

I hereby complain first that the foregoing expenditures of Government funds were illegal to the extent not reimbursed by the PFC. The travel detailed above by the two Secretaries had only the remotest connection with their official duties. A comparison with their own or their predecessors travels and public appearances in the corresponding periods of 1975 might be revealing.

Second, I complain that the non-reimbursement by the President Ford Committee to the U.S. Government of the travel expenses detailed above constitutes separate violations each of the Federal Election Campaign Act of 1971, as amended, and of the reporting provisions of said Act.

The information contained in this letter is in the public domain. It is contained in an article in the Washington Post of 8 July 1976 by Rowland Evans and Robert Novak, entitled : The President's Cost-Free Advocates.

Sincerely,

Charles H. Breecher
CHARLES H. BREECHER

Subscribed to and sworn to before me on 9 July 1976

Dorothy H. Poore
Notary

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040040991

CERTIFIED

No. 74001761

MAIL

Federal Election Commission
1325 K St.
Washington, D.C. 20543
90: 74001761

**FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL**

Report of Receipts and Expenditures
for Candidate or Committee
Supporting any Candidate(s) for
Nomination or Election to Federal Office

RECEIVED
FEDERAL ELECTION
COMMISSION

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

75 JUL 9 PM 1:41

1(a) Name of Candidate or Committee (in full) THE PRESIDENT FORD COMMITTEE		2 Identification Number C-00031336
(b) Address (number and street) 1828 L St., N.W.		3(a) Is this a report of receipts and expenditures for only one election? ☒ Yes ☐ No
(c) City, State and ZIP code Washington, D.C. 20036		(b) If "Yes," for which election? Primary on _____ (Date) (General, Primary, Runoff)
4 Type of Report (Check appropriate box and complete, if applicable)		
(a) ☐ Amendment (c) ☐ July 10 report		
(b) ☐ April 10 Report (d) ☐ October 10 report		
(e) ☐ January 31 Report		
(f) ☒ Alternative Monthly Report		
(g) ☐ Termination		
(h) ☐ Tenth day report preceding _____ election on _____ in the state of _____ (primary, general or convention) (date)		
(i) ☐ Thirtieth day report following _____ election on _____ in the state of _____ (primary, general or convention) (date)		

Committee Summary of Receipts and Expenditures

5 Covering Period: From **June 1, 1976** Through **June 30, 1976**

Section A - Cash Balance Summary	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 1976		\$ 214,806.47
7 Cash on hand at beginning of reporting period	\$ 551,710.73	
8 Add total receipts (from line 13)	\$1,523,435.21	\$11,254,909.11
9 Subtotal	\$2,075,145.94	\$11,469,715.58
10 Subtract total expenditures (From line 24)	\$1,484,711.24	\$10,879,280.88
11 Cash on hand at close of reporting period	\$ 590,434.70	\$ 590,434.70
12 Contributed items on hand to be liquidated (attach itemized list)	\$ - 0 -	

Section B - Presidential Campaign Expenditures Subject to Limitation - Summary
(Applies Only To Presidential Candidates Receiving Federal Funds)

12 Operating expenditures (from line 20)	\$1,259,128.44	\$ 9,049,107.31
13 Less Refunds and Rebates (from line 17)	\$ 121,961.03	\$ 277,320.44
14 (a) Expenditures subject to limitation	\$1,137,167.41	\$ 8,771,786.87
(b) Expenditures from prior years subject to limitation		\$ 859,892.35
Less Accounting & Legal Expenses Excludable (Schedule E)		111,880.51
(c) Total expenditures subject to limitation		\$ 9,519,798.71

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Robert C. Moot

(Signature of Treasurer or Candidate)

July 9, 1976

(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §441 (text on reverse side of form).

For further
information
Contact:

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

NAME	ADDRESS	CITY	STATE	ZIP	PHONE	TELETYPE	TELEFAX	TELEFAX	TELEFAX
06920HNSN021WALTER	EHANSON	56G	3	0	4	0	0	0	0
FEAT MARWICK MITCHELL & CO	NEW YORK	NY10022			50000	10676	50000	001	50000M
65124MPNP706R1ROBERT	WHAPNER	40G	56A	2800	1706	5	88TH ST	OMAHA	NE
WHIREPCCL DIV SICLER				PENDING	40000	20576	20000	0676	20000
30327HRDN50C11IRA	HHARDIN	38F	60A	9906	1380	W PAGES FERRY RD	ATLANTA	GA	
IRA H HARDIN CO	ATLANTA		GA	CONTRACTOR	50000	20276	15000	0676	35000
43640HRLW208111	FHARLOW	56G		0944	1208	CRESCENT DR	MIDLAND	MI	
THE BOW CHEMICAL CO	MIDLAND			MI48640 Vice President	50000	10676	50000	001	50000M
45237HRPN001R1ROBERT	AHARPENAU	59F		3650	8001	READING RD	CINCINNATI	OH	
				INVESTMENT	15000	10676	15000	001	15000M
10021HRRS570A4ALFRED	CHARRISON	74G		3312	570	PARK AVE	NEW YORK	NY	
				PENDING	25000	10676	25000	001	25000M
10021HRRS570P4PAULINE	LHARRISON	82Q	70A	99M4	570	PARK AVE	NEW YORK	NY	
				PENDING	50000	20376	25000	0676	25000
50049HRTW254L4LINDA	HARTWICK	70G		0500	254	N BARRINGTON	LOS ANGELES	CA	
				HOME MAKER	20000	10676	20000	001	20000M
60614HRVY430D1DACGETT	HARVEY	92M	74M	9997	2430	LAKEVIEW AVE	CHICAGO	IL	
30 E JACKSON BLVD RM 515	CHICAGO		IL	PENDING	100000	20476	50000	0676	50000
85718HUGH705J4J	HHAUGH	61A		0300	5705	N CAMPBELL AVE	TUCSON	AZ	
				PENDING	25000	10676	25000	001	25000M
85718HUGH705J1JOHN	HHAUGH	26I		0300	5705	N CAMPBELL AVE	TUCSON	AZ	
TUCSON TALLOR INC	TUCSON		AZ	PENDING	50000	20576	25000	0676	25000
10580HUPK058E4ERID	AHAUPK	60E		3312	95	RYE RD	RYE	NY	
					100000	10676	100000	001	100000M
43560HKK353A1ALFRED	CHANKINS	59F		3655	5353	NORTHBROOK CT	SYLVANIA	OH	
LISBY OWENS & FORD CO	TOLEDO		OH	CORP. OFFICER	50000	10676	50000	001	50000M
91002HYES25681BYRON	HAYES	JR	70I	0582	4256	NAVAJO ST	TELUKA LAKE	CA	
MCCUTCHEN BLACK VERLGER & SHELLOS	ANGELES		CA	90010 LAWYER	20000	10676	20000	001	20000M
45243HYES335F1FORREST	HAYES	74E		3650	8355	OLD HICKORY DR	CINCINNATI	OH	
ARTHUR ANDERSEN & CO	CINCINNATI			OH45202 PARTNER	30000	10676	30000	001	30000M

11209KTTL15254STEPHEN KITTEL	200 3 600 4 600 0 3300 0 12 2 7TH ST	BROOKLYN NY	NOT REQUIRED	37500 30476 20000 0676 10000 0676 7500 002	175004
47715KLSSJ15R1ROGER KKLASSY	49A	1500 3315 E MULBERRY ST	EVANSVILLE IN		
KLASSY LUMBER CO		BUS. EXECUTIVE	25000 10676 25000	001	25000M
39054KLUS23821WM JKLAUS	56I	99M8 20 BOX 238	CARY MS		
SHARKEY CO CARY	MS	FARMER	100000 10676 100000	001	100000M
45206KLYF001B1BERNARD SKLAYF	59F	3050 1 GRANDIN PL	CINCINNATI OH		
FEDERATED DEPARTMENT STORES CINCINNATI		OH45202CORP. OFFICER	100000 10676 100000	001	100000M
10022KLNW455S1SEYMOUR KLEINMAN	70D	0944 645 5 AVE	NEW YORK NY		
GOLDBOCK & BARELL NEW YORK		NY10022LAWYER	100000 10676 100000	001	100000M
07423KLPWC20K1WILLIAM AKLOPMAN	56I	99J5 20 SADDLE RIDGE RD	HO HO KUS NJ		
NEW YORK CITY	NY	CORP. OFFICER	75000 10676 75000	001	75000M
20016KNPP434GAGORDON KNAPP	70J	99M5 4434 CHALFONT PL	WASHINGTON DC		
PENTAGON WASHINGTON	DC	GOVT OFFCL	50000 10676 50000	001	50000M
22101KN2L412J1JOHN AKNEBEL	53A	1418 LABURNUM ST	MCLEAN VA		
US DEPT AGRICULTURE WASHINGTON	DC	GOVT OFFCL	20000 10676 20000	001	20000M
44115KNGH562E4ELIZABETH KNIGHT	76F	99J8 1562 UNION COMMERCE BLDG	CLEVELAND OH		
		PENDING	100000 10676 100000	001	100000M
60045KNGH650J1JOHN LKNIGHT	74M	99M8 490 N GREEN BAY RD	LAKE FOREST IL		
LAKE BLUFF	IL	MANUFACTURER	100000 10676 100000	001	100000M
45215KNAL250A1AUSTIN EKNOWLTON	59F	3050 BOX 250	BELLFOUNTAIN OH		
THE AUSTIN E KNOWLTON CO		OH45215CORP. OFFICER	100000 10676 100000	001	100000M
79701KNQX201G1GORDON KNOX	70A	9995 201 C & K PETROLEUM BLDG	MIDLAND TX		
		PENDING	25000 10676 25000	001	25000M
20007KNCX259K2KATHARINE KNKCX	56A	0900 3259 N ST NW	WASHINGTON DC		
		PENDING	25000 10676 25000	001	25000M
20007KNCX000H4MCCOOK KNOX	56F	0944	WASHINGTON DC		
		HOMEMAKER	75000 10676 75000	001	75000M
14240KNQX057S1SEYMOUR KNOX	74C	3312 57 HAKLAND PL	BUFFALO NY		
		RETIRED	100000 10676 100000	001	100000M

OFFICE OF GENERAL COUNSEL
JUL 1 1977



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 190/198 File 1

78040010996





FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 190/198 File 2

78040010997



MC 0188

CRAMER, HABER & BECKER

ATTORNEYS AT LAW

475 L'ENFANT PLAZA, S. W.

SUITE 4100

WASHINGTON, D. C. 20024

RECEIVED
FEDERAL ELECTION
COMMISSION

TELEPHONE 554-1100

CODE 202

TELEX: ITT 440048

WILLIAM C. CRAMER
BENTON L. BECKER
ROBERT P. VISSER
CHARLES B. LIPSEN
JOHN T. CALKINS
MICHAEL A. MILWEE
GORDON M. STRAUSS
KENNETH M. BELLIS
JAN M. PEDERSON

77 DEC 5 AM 11:02

OF COUNSEL

RICHARD M. HABER

F. LAWRENCE MATTHEWS

November 30, 1977

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

778534

Re: MUR 190/198

Dear Mr. Oldaker:

This is to acknowledge receipt of an executed copy of the Conciliation Agreement reached between us regarding the above-referenced matters. As this finalizes the last compliance matter of the President Ford Committee pending before the Commission, I would like to take this opportunity on behalf of the PFC to personally thank you for the consideration and close cooperation which you and members of your legal staff have afforded us over the past several years. It has been a pleasure to work with you in my capacity as General Counsel to the PFC and I look forward to working together with you on other election law matters in the future.

Best regards.

Very truly yours,

Robert P. Visser

Robert P. Visser

RPV:dls

CRAMER, HABER & BECKER
ATTORNEYS AT LAW
475 L'ENFANT PLAZA, S.W.
SUITE 4100
WASHINGTON, D. C. 20024

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

77 DEC 5 AM 11:01

FEDERAL ELECTION
COMMISSION



FEDERAL ELECTION COMMISSION

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

November 21, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert Visser, Esq.
Cramer, Visser, Lipsen
and Smith
475 L'Enfant Plaza, S.W.
Suite 4100
Washington, D.C. 20024

Re: MURs 190/198

Dear Mr. Visser:

Please find enclosed a fully executed copy of the concilia-
tion agreement in this matter.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure



7 8 0 4 0 0 1 1 0 0 1

190/198 AA

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● **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: R. Visser, Esq.
Cramer, Visser, Lipsen, Smith
475 L'Enfant Plaza, S.W.
Suite 4100; wash. d.c. 20024

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
943141

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Catherine Hough

4. DATE OF DELIVERY
11/23

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

NOV 23 1977

November 4, 1977

CONCILIATION AGREEMENT

In the Matter of :
: MUR 190 (76)
The President Ford Committee : and
: MUR 198 (76)
: Respondent :
:

78041011002
Complaints having been filed under the Federal Election Campaign Act of 1971, as amended (hereinafter referred to as the "Act"), specifically 2 U.S.C. § 437g, with the Federal Election Commission (hereinafter referred to as the "Commission") against the President Ford Committee (hereinafter referred to as the "Respondent"), the Commission having made the determinations required by 2 U.S.C. § 437 g (a) (5) relative to the alleged violations and the Respondent having voluntarily cooperated in supplying information and records during the course of the investigation, the Commission and Respondent do hereby resolve and conciliate the above-captioned matters under review pursuant to 2 U.S.C. § 437g(a)(5)(A) by agreeing as follows:

A. That the Commission has jurisdiction over the Respondent and the subject matter of this complaint.

B. That the Respondent has had a reasonable opportunity to demonstrate that no action should be taken against it.

FEDERAL ELECTION COMMISSION
CENTRAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040011003

C. That the pertinent facts in this matter are as follows:

1. Expenditures relative to the following trips are the subject matter of this action:

a.	Sec. Simon*	Raleigh, N.C., Columbia, S.C.	1-20-76
b.	Sec. Simon	Mississippi & Florida	2-10-76
	Sec. & Mrs. Simon	Texas & Alabama	2-16-76
c.	Sec. & Mrs. Simon	New York City	3-30-76
d.	Sec. Richardson*	Los Angeles	5-10/11-76
e.	Sec. Richardson	Birmingham & Alabama	4-28-76

2. The costs and allocation figures for these trips, as supplied by Respondent, are set forth in Appendix I.

3. The Respondent through its General Counsel, specifically related in testimony before the Commission on November 19, 1975, concerning the Commission's then proposed allocation regulation, a formula for allocating the costs for political activity for trips that included non-candidate related activity.

* William Simon, Secretary of Treasury
* Elliot Richardson, Secretary of Commerce

Respondent stated: "I would say in that case that it would be our view that we would apportion the time spent of say, a candidate's aide or campaign manager in proportion to the time spent . . . we would allocate the campaign time spent in proportion to his official time and prorate that against an allocable portion of his expenses, dual allocation." Respondent's statements involve an allocation based on campaign time divided by the total of campaign time and other business time.

4. That § 106.3(C)(1) of the regulations adopted by the Commission to implement the provisions of the Federal Election Campaign Act of 1971, as amended, states:

Where an individual, other than a candidate, conducts campaign related activity on a trip, the portion of the trip attributed to each candidate shall be allocated on a reasonable basis.

D. Wherefore, Respondent and Commission agree as follows:

1. It is acknowledged that the 1976 primary and general elections were the first such elections to be governed by the Federal Election Campaign Act, as amended; that portions of the previous campaign act had been found unconstitutional by the Supreme Court in Buckley v. Valeo, 424 U.S. 1 (1976), and that the regulations were not promulgated by the Commission until April 12, 1977 (42 F.R. 19324).

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

2. That the allocation formula as stated by the Respondent was reasonable in light of the relevant statutory provisions and the standards proposed by the Commission in its draft regulations.

3. That although the aforementioned method of allocation was generally reasonable, its application to the above mentioned trips has resulted in an unreasonably low reimbursement by the Respondent to the United States Treasury.

4. That using the Respondent's stated formula of allocating campaign time in proportion to official time in determining the expense to be allocated, the sum of \$688.00 when added to the amounts previously allocated results in a reasonable allocation for the trips mentioned herein.

5. Respondent will reimburse the United States Government \$688.00 and will amend the appropriate reports filed pursuant to 2 U.S.C. §434 to reflect this expenditure.

6. The parties also agree that the stipulation appended hereto shall be incorporated and made a part of this agreement.

E. General Provisions

1. It is understood that this agreement does not

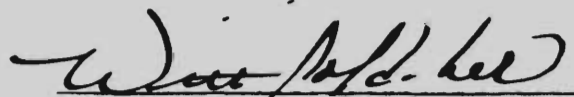
constitute an admission by the Respondent of any violation of the Federal Election Campaign Act of 1971, as amended.

2. The Commission on request of anyone filing a complaint under 2 U.S.C. § 437(g)(a)(1) concerning the matters at issue herein, or on its own motive may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court of the District of Columbia.

3. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

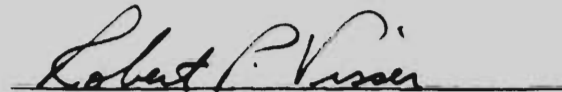
4. It is agreed that Respondent shall ~~have~~ have no more than 30 days from when this agreement becomes effective to comply with and implement the requirements contained in this agreement.

Dated:



WILLIAM C. OLDAKER

General Counsel for the Commission



ROBERT P. VISSER

General Counsel for the President
Ford Committee

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

November 4, 1977

Before the Federal Election Commission

In the Matter of :
The President Ford Committee : STIPULATION

730410002

The Federal Election Commission and the President Ford Committee have entered into a conciliation agreement with respect to two complaints (MURs 190 and 198) involving the allocation of costs of certain trips made by members of President Ford's Administration which involved business conducted on behalf of the 1976 President Ford election campaign. Pursuant to said conciliation, the Commission, with the voluntary consent and cooperation of the President Ford Committee, has reviewed records of all Ford Administration officials who were reported as having incurred costs on behalf of the President's campaign. The Commission and President Ford Committee herewith stipulate and agree as follows:

1. The Respondent through its General Counsel, specifically related in testimony before the Commission on November 19, 1975, concerning the Commission's then proposed allocation regulation, its formula for allocating the costs for political activity for trips that included non-candidate related activity. Respondent stated: "I would say in that case that it would be our view that we apportion the time spent of say, a candidate's aide or campaign manager in proportion to the time spent . . . we would allocate the campaign time spent in proportion to his

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

7 3 9 4 0 0 1 1 0 0 3

official time and prorate that against an allocable portion of his expenses, dual allocation." These statements indicate an allocation approach based on campaign time divided by the total of campaign time and other business time.

2. That the allocation formula as stated by the President Ford Committee was reasonable in light of the relevant statutory provisions and the standards proposed by the Commission in its draft regulations.

3. That, although the aforementioned method of allocation was generally reasonable, its application to 35 trips has inadvertently resulted in an unreasonably low reimbursement by the President Ford Committee to the United States Treasury. The costs of five of these trips are summarized in the conciliation agreement in MURs 190 and 198. The costs of the remaining trips are summarized in Appendix I of this Stipulation.

4. Using the President Ford Committee's stated formula noted in paragraph 1 herein, the sum of \$2,808.19, when added to the amounts previously allocated, results in a reasonable allocation for the trips mentioned herein.

5. The President Ford Committee will reimburse the United States Government \$2,808.19 and amend the appropriate reports filed pursuant to 2 U.S.C. § 434 to reflect this expenditure.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

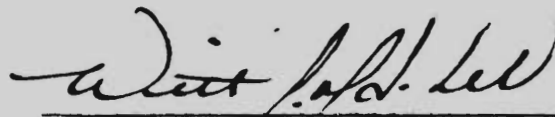
6. This agreement and the Conciliation Agreement in MURs 190 and 198, unless violated, shall constitute a complete bar to further action on all matters which were or might have been alleged in connection with the subject matter herein, as described in the introductory paragraph of the Stipulation.

7. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

8. It is agreed that Respondent shall have no more than 30 days from when this agreement becomes effective to comply with and implement the requirements contained in this agreement.

DATED:


ROBERT P. VISSER
General Counsel for the President
Ford Committee


WILLIAM C. OLDAKER
General Counsel for the Commission

FEDERAL ELECTION COMMISSION
CENTRAL FILE COPY
OFFICE OF GENERAL COUNSEL

7 8 0 4 0 0 1 1 0 1 0

PRIMARY ALLOCATION FOR THE PRESIDENT FORD COMMITTEE
ADVOCATE TRAVEL

I. TRIPS CHALLENGED IN
MUR 190/198

<u>ADVOCATE</u>	<u>DATES</u>	<u>TRIPS</u>	<u>COST</u>	<u>ADVOCATE COST</u>	<u>P.F.C. ALLOCATION</u>	<u>SUGGESTED ALLOCATION</u>	<u>AMOUNT DUE</u>
SIMON, William	1/20/76	Raleigh, NC Columbia, SC	\$2,310.00 Air charter	\$557	\$17.00	\$120.00	\$103.00
	1/10/76 2/13/76	Mississippi & Florida	\$2,209.60	\$1,710	\$243.43	\$342.43	\$99.00
SIMON, William & SIMON, Mrs. Wm.	2/16/76	Texas & Ark.	\$2,209.60	\$1,200	\$201.16	\$300.17	\$99.01
SIMON, William	3/30/76	DC/NY/DC	\$644.76	\$350	\$29.01	\$140.00	\$110.99
RICHARDSON, Elliot	5/10-11/76	LA	\$1,144.00 w/aide	\$572	\$57.00	\$240.00	\$183.00
RICHARDSON, Elliot	4/28/76	DC-Atlanta, Birmingham, Memphis	\$388.00 3/aide	\$388	\$17.00	\$110.00	\$93.00
			<u>\$6,696.36</u>	<u>\$4,634</u>	<u>\$564.60</u>	<u>\$1,252.60</u>	<u>\$688.00</u>

FEDERAL ELECTION COMMISSION
 OFFICIAL FILE COPY
 OFFICE OF GENERAL COUNSEL

7 3 0 4 0 0 1 1 0 1 1
PRIMARY ALLOCATION FOR THE PRESIDENT FORD COMMITTEE

ADVOCATE TRAVEL

II TRIPS RECOMPUTED

b) Trips where information is insufficient

<u>ADVOCATE</u>	<u>DATES</u>	<u>TRIPS</u>	<u>COST</u>	<u>PFC ALLOCATION</u>	<u>STIPULATED ALLOCATION</u>	<u>AMOUNT DUE</u>
BUTZ, Earl	5/27-6/7/76	DC-LA-SD-LA-Mtry Fresno-LA-Tampa-DC	\$776.41	\$17.32	\$341.62	\$324.30
GOROG, William	6/1-4/76	DC-Ohio-DC	373.18	91.00	164.20	73.20
KLEPPE, Thomas	5/4/76	DC-Portland-DC	596.74	11.05	29.27	18.22
	3/10-12/76	DC-IL-ND-DC	592.22	19.74	260.58	240.84
	3/31-4/1/76	DC-Grand Fork-DC	344.98	12.32	31.04	18.72
KNAUER, Virginia	5/31-6/4/76	DC-SF-Reading-Sac-LA-DC	612.84	39.90	269.65	229.75
LYNN, James	4/15-20/76	DC-Tucson-DC-NY-DC	390.00	72.00	171.86	99.86
SEIDMAN, William	5/12-15/76	DC-Mich-DC	426.19	162.35	187.52	25.17
TOWER, John	5/8-9/76	Hawaii-LA-DC	810.00	-0-	356.40	356.40
			<u>\$4,922.56</u>	<u>\$425.68</u>	<u>\$1,812.14</u>	<u>\$1,386.46</u>

Computation: $\frac{\text{Total PFC Allocation}}{\text{Total Suggested Allocation}} \times \text{Cost}$

44% average

Total Due: $\frac{\$1,421.73}{1,386.46}$
\$2,808.19

OFFICE OF THE ATTORNEY GENERAL
 OFFICE OF THE ATTORNEY GENERAL
 OFFICE OF THE ATTORNEY GENERAL

PRIMARY ALLOCATION FOR THE PRESIDENT FORD COMMITTEE

7 3 ADVOCATE TRAVEL 0 1 2

II TRIPS RECOMPUTED:

a) Trips where sufficient data is available

<u>ADVOCATE</u>	<u>DATES</u>	<u>TRIPS</u>	<u>COST</u>	<u>PFC ALLOCATION</u>	<u>STIPULATED ALLOCATION</u>	<u>AMOUNT DUE</u>
BAKER, James	4/9-11/76	DC-Houston-DC	\$273.00	\$10.00	\$27.30	\$17.30
RICHARDSON, Elliot	3/26-29/76	Vail-SF-Sac-DC	645.29	21.25	103.24	81.99
BUTZ, Earl	1/12-14/76	DC-Chi-D'Moines-DC	327.84	25.90	36.06	10.16
	2/25-31/76	DC-LA-San Angelo-DC	413.00	63.00	128.03	65.03
	3/23-29/76	DC-Sacra-LA-Phoenix LA-Fresno-LA	568.00	20.00	68.16	48.16
	5/9-11/76	DC-Minn-Memphis-Chi- Knoxville-DC	212.00	7.00	93.28	86.28
	5/19-20/76	DC-Kansas-DC	285.00	21.87	51.30	29.43
	6/17/76	DC-Indiana-Idaho- Fresno-Spokane-DC	310.00	37.00	136.40	99.40
HILLS, Carl	5/23-26/76	DC-SF-LA-SD-LA-DC	754.98	155.10	286.89	131.79
KLEPPE, Thomas	5/25-26/76	DC-Chi-Fargo-DC	407.75	21.46	40.77	19.31
	4/21-23/76	DC-Salt Lake-Dallas-DC	475.50	13.98	42.79	28.81
KOBELINSKI, Mitchell	5/6-7/76	DC-Billing-DC	492.20	71.05	211.64	140.59
	6/3/76	DC-Cleveland-DC	167.00	43.42	73.48	30.06
LYNCH, Margaret	3/29-30/76	DC-Milwaukee-DC	237.00	30.00	54.51	24.51
	4/30-5/26/76	DC-Seattle-Portland Spokane-Seattle-DC	739.50	86.50	325.38	238.88
	5/28-6/6/76	DC-Vancouver- Columbus-DC	577.80	65.28	254.23	188.95

FEDERAL ELECTION COMMISSION
 OFFICIAL FILE COPY
 OFFICE OF GENERAL COUNSEL

PRIMARY ALLOCATION FOR THE PRESIDENT FORD COMMITTEE
ADVOCATE TRAVEL

II TRIPS RECOMPUTED

a) Trips where sufficient data is available

<u>ADVOCATE</u>	<u>DATES</u>	<u>TRIPS</u>	<u>COST</u>	<u>PFC ALLOCATION</u>	<u>STIPULATED ALLOCATION</u>	<u>AMOUNT DUE</u>
MATTHEWS, David	1/23/76	DC-Chicago-DC	\$130.00	\$12.00	\$32.50	\$20.50
	5/2-4/76	DC-LA-DC	445.15	8.90	57.86	48.96
SEIDMAN, L. William	6/30-7/2/76	DC-Chi-Albuq-Col Spring-DC	260.00	28.25	80.60	52.35
ZARB, Frank	10/15-16/76	DC-LA-Dallas-DC	538.60	215.35	236.98	21.63
USERY, William	5/12-13/76	DC-Detroit-Chicago- DC	106.00	9.00	46.64	37.64
			<u>\$8,365.61</u>	<u>\$966.31</u>	<u>\$2,388.04</u>	<u>\$1,421.73</u>

**FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL**



FEDERAL ELECTION COMMISSION

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

November 15, 1977

Robert P. Visser, Esq.
Cramer, Visser, Lipsen
and Smith
475 L'Enfant Plaza, S.W.
Suite 4100
Washington, D.C. 20024

Re: MURs 190/198

Dear Mr. Visser:

I have enclosed herewith the conciliation agreement and stipulation in the above-numbered matter, as approved by the Commission on November 10, 1977.

As I mentioned to you in our phone conversation on Friday, there are two minor changes from the drafts that you hand delivered to our office, both found in the conciliation agreement. On page 4, paragraph 3, the word inadvertently has been eliminated; at the end of the conciliation agreement, a new appendix has been substituted which sets forth certain additional information as to the five trips noted in the complaint. The form of the appendix now follows the one attached to the stipulation.

If you find the papers in satisfactory condition, please sign and return them to our office at your earliest possible convenience.

Sincerely yours,

William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

November 4, 1977

CONCILIATION AGREEMENT

In the Matter of :
The President Ford Committee : MUR 190 (76)
: and
Respondent : MUR 198 (76)

78040011013
Complaints having been filed under the Federal Election Campaign Act of 1971, as amended (hereinafter referred to as the "Act"), specifically 2 U.S.C. § 437g, with the Federal Election Commission (hereinafter referred to as the "Commission") against the President Ford Committee (hereinafter referred to as the "Respondent"), the Commission having made the determinations required by 2 U.S.C. § 437 g (a)(5) relative to the alleged violations and the Respondent having voluntarily cooperated in supplying information and records during the course of the investigation, the Commission and Respondent do hereby resolve and conciliate the above-captioned matters under review pursuant to 2 U.S.C. § 437g(a)(5)(A) by agreeing as follows:

A. That the Commission has jurisdiction over the Respondent and the subject matter of this complaint.

B. That the Respondent has had a reasonable opportunity to demonstrate that no action should be taken against it.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

73040011015

C. That the pertinent facts in this matter are as follows:

1. Expenditures relative to the following trips are the subject matter of this action:

a.	Sec. Simon*	Raleigh, N.C., Columbia, S.C.	1-20-76
b.	Sec. Simon	Mississippi & Florida	2-10-76
	Sec. & Mrs. Simon	Texas & Alabama	2-16-76
c.	Sec. & Mrs. Simon	New York City	3-30-76
d.	Sec. Richardson*	Los Angeles	5-10/11-76
e.	Sec. Richardson	Birmingham & Alabama	4-28-76

2. The costs and allocation figures for these trips, as supplied by Respondent, are set forth in Appendix I.

3. The Respondent through its General Counsel, specifically related in testimony before the Commission on November 19, 1975, concerning the Commission's then proposed allocation regulation, a formula for allocating the costs for political activity for trips that included non-candidate related activity.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

-
- * William Simon, Secretary of Treasury
 - * Elliot Richardson, Secretary of Commerce

78040011017

Respondent stated: "I would say in that case that it would be our view that we would apportion the time spent of say, a candidate's aide or campaign manager in proportion to the time spent . . . we would allocate the campaign time spent in proportion to his official time and prorate that against an allocable portion of his expenses, dual allocation." Respondent's statements involve an allocation based on campaign time divided by the total of campaign time and other business time.

4. That § 106.3(C)(1) of the regulations adopted by the Commission to implement the provisions of the Federal Election Campaign Act of 1971, as amended, states:

Where an individual, other than a candidate, conducts campaign related activity on a trip, the portion of the trip attributed to each candidate shall be allocated on a reasonable basis.

D. Wherefore, Respondent and Commission agree as follows:

1. It is acknowledged that the 1976 primary and general elections were the first such elections to be governed by the Federal Election Campaign Act, as amended; that portions of the previous campaign act had been found unconstitutional by the Supreme Court in Buckley v. Valeo, 424 U.S. 1 (1976), and that the regulations were not promulgated by the Commission until April 12, 1977 (42 F.R. 19324).

7 3 0 4 0 0 1 1 0 1 3

2. That the allocation formula as stated by the Respondent was reasonable in light of the relevant statutory provisions and the standards proposed by the Commission in its draft regulations.

3. That although the aforementioned method of allocation was generally reasonable, its application to the above mentioned trips has resulted in an unreasonably low reimbursement by the Respondent to the United States Treasury.

4. That using the Respondent's stated formula of allocating campaign time in proportion to official time in determining the expense to be allocated, the sum of \$688.00 when added to the amounts previously allocated results in a reasonable allocation for the trips mentioned herein.

5. Respondent will reimburse the United States Government \$688.00 and will amend the appropriate reports filed pursuant to 2 U.S.C. §434 to reflect this expenditure.

6. The parties also agree that the stipulation appended hereto shall be incorporated and made a part of this agreement.

E. General Provisions

1. It is understood that this agreement does not

73949911012

constitute an admission by the Respondent of any violation of the Federal Election Campaign Act of 1971, as amended.

2. The Commission on request of anyone filing a complaint under 2 U.S.C. § 437(g)(a)(1) concerning the matters at issue herein, or on its own motive may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court of the District of Columbia.

3. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

4. It is agreed that Respondent shall leave no more than 30 days from when this agreement becomes effective to comply with and implement the requirements contained in this agreement.

Dated:

WILLIAM C. OLDAKER
General Counsel for the Commission

ROBERT P. VISSER
General Counsel for the President
Ford Committee

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

PRIMARY ALLOCATION FOR THE PRESIDENT FORD COMMITTEE
ADVOCATE TRAVEL

I. TRIPS CHALLENGED IN
MUR 190/198

<u>ADVOCATE</u>	<u>DATES</u>	<u>TRIPS</u>	<u>COST</u>	<u>ADVOCATE COST</u>	<u>P.F.C. ALLOCATION</u>	<u>SUGGESTED ALLOCATION</u>	<u>AMOUNT DUE</u>
SIMON, William	1/20/76	Raleigh, NC Columbia, SC	\$2,310.00 Air charter	\$557	\$120.00	\$120.00	\$103.00
	1/10/76 2/13/76	Mississippi & Florida	\$2,209.60	\$1,710	\$342.43	\$342.43	\$99.00
SIMON, William & SIMON, Mrs. Wm.	2/16/76	Texas & Ark.	\$2,209.60	\$1,200	\$300.17	\$300.17	\$99.01
SIMON, William	3/30/76	DC/NY/DC	\$644.76	\$350	\$140.00	\$140.00	\$110.99
RICHARDSON, Elliot	5/10-11/76	LA w/aide	\$1,144.00	\$572	\$240.00	\$240.00	\$183.00
RICHARDSON, Elliot	4/28/76	DC-Atlanta, Birmingham, Memphis	\$388.00 3/aide	\$388	\$110.00	\$110.00	\$93.00
			<u>\$6,696.36</u>	<u>\$4,634</u>	<u>\$564.60</u>	<u>\$1,252.60</u>	<u>\$688.00</u>

7804001020

November 4, 1977

Before the Federal Election Commission

In the Matter of :
: STIPULATION
The President Ford Committee :

73040011021

The Federal Election Commission and the President Ford Committee have entered into a conciliation agreement with respect to two complaints (MURs 190 and 198) involving the allocation of costs of certain trips made by members of President Ford's Administration which involved business conducted on behalf of the 1976 President Ford election campaign. Pursuant to said conciliation, the Commission, with the voluntary consent and cooperation of the President Ford Committee, has reviewed records of all Ford Administration officials who were reported as having incurred costs on behalf of the President's campaign. The Commission and President Ford Committee herewith stipulate and agree as follows:

1. The Respondent through its General Counsel, specifically related in testimony before the Commission on November 19, 1975, concerning the Commission's then proposed allocation regulation, its formula for allocating the costs for political activity for trips that included non-candidate related activity. Respondent stated: "I would say in that case that it would be our view that we apportion the time spent of say, a candidate's aide or campaign manager in proportion to the time spent . . . we would allocate the campaign time spent in proportion to his

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

official time and prorate that against an allocable portion of his expenses, dual allocation." These statements indicate an allocation approach based on campaign time divided by the total of campaign time and other business time.

2. That the allocation formula as stated by the President Ford Committee was reasonable in light of the relevant statutory provisions and the standards proposed by the Commission in its draft regulations.

3. That, although the aforementioned method of allocation was generally reasonable, its application to 35 trips has inadvertently resulted in an unreasonably low reimbursement by the President Ford Committee to the United States Treasury. The costs of five of these trips are summarized in the conciliation agreement in MURs 190 and 198. The costs of the remaining trips are summarized in Appendix I of this Stipulation.

4. Using the President Ford Committee's stated formula noted in paragraph 1 herein, the sum of \$2,808.19, when added to the amounts previously allocated, results in a reasonable allocation for the trips mentioned herein.

5. The President Ford Committee will reimburse the United States Government \$2,808.19 and amend the appropriate reports filed pursuant to 2 U.S.C. § 434 to reflect this expenditure.

78040011022

7 3 0 4 0 0 1 1 0 2 3

6. This agreement and the Conciliation Agreement in MURs 190 and 198, unless violated, shall constitute a complete bar to further action on all matters which were or might have been alleged in connection with the subject matter herein, as described in the introductory paragraph of the Stipulation.

7. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

8. It is agreed that Respondent shall leave no more than 30 days from when this agreement becomes effective to comply with and implement the requirements contained in this agreement.

DATED:

ROBERT P. VISSER
General Counsel for the President
Ford Committee

WILLIAM C. OLDAKER
General Counsel for the Commission

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

PRIMARY ALLOCATION FOR THE PRESIDENT FORD COMMITTEE

ADVOCATE TRAVEL
7 3 4 4 4 4 4 0 2 1

II TRIPS RECOMPUTED:

a) Trips where sufficient data is available

<u>ADVOCATE</u>	<u>DATES</u>	<u>TRIPS</u>	<u>COST</u>	<u>PFC ALLOCATION</u>	<u>STIPULATED ALLOCATION</u>	<u>AMOUNT DUE</u>
BAKER, James	4/9-11/76	DC-Houston-DC	\$273.00	\$10.00	\$27.30	\$17.30
RICHARDSON, Elliot	3/26-29/76	Vail-SF-Sac-DC	645.29	21.25	103.25	81.99
BUTZ, Earl	1/12-14/76	DC-Chi-D'Moines-DC	327.84	25.90	36.00	10.16
	2/25-31/76	DC-LA-San Angelo-DC	413.00	63.00	128.00	65.03
	3/23-29/76	DC-Sacra-LA-Phoenix LA-Fresno-LA	568.00	20.00	68.10	48.16
	5/9-11/76	DC-Minn-Memphis-Chi- Knoxville-DC	212.00	7.00	93.28	86.28
	5/19-20/76	DC-Kansas-DC	285.00	21.87	51.30	29.43
	6/17/76	DC-Indiana-Idaho- Fresno-Spokane-DC	310.00	37.00	136.40	99.40
HILLS, Carla	5/23-26/76	DC-SF-LA-SD-LA-DC	754.98	155.10	286.89	131.79
KLEPPE, Thomas	5/25-26/76	DC-Chi-Fargo-DC	407.75	21.46	40.77	19.31
	4/21-23/76	DC-Salt Lake-Dallas-DC	475.50	13.98	42.79	28.81
KOBELINSKI, Mitchell	5/6-7/76	DC-Billing-DC	492.20	71.05	211.64	140.59
	6/3/76	DC-Cleveland-DC	167.00	43.42	73.48	30.06
LYNCH, Margaret	3/29-30/76	DC-Milwaukee-DC	237.00	30.00	54.51	24.51
	4/30-5/26/76	DC-Seattle-Portland Spokane-Seattle-DC	739.50	86.50	325.38	238.88
	5/28-6/6/76	DC-Vancouver- Columbus-DC	577.80	65.28	254.23	188.95

PRIMARY ALLOCATION FOR THE PRESIDENT FORD COMMITTEE

ADVOCATE TRAVEL

II TRIPS RECOMPUTED

a) Trips where sufficient data is available

<u>ADVOCATE</u>	<u>DATES</u>	<u>TRIPS</u>	<u>COST</u>	<u>PFC ALLOCATION</u>	<u>STIPULATED ALLOCATION</u>	<u>AMOUNT DUE</u>
MATTHEWS, David	1/23/76	DC-Chicago-DC	\$130.00	\$12.00	\$32.50	\$20.50
	5/2-4/76	DC-LA-DC	445.15	8.90	57.86	48.96
SEIDMAN, L. William	6/30-7/2/76	DC-Chi-Albuq-Col Spring-DC	260.00	28.25	80.60	52.35
ZARB, Frank	10/15-16/76	DC-LA-Dallas-DC	538.60	215.35	236.98	21.63
USERY, William	5/12-13/76	DC-Detroit-Chicago- DC	106.00	9.00	46.64	37.64
			<u>\$8,365.61</u>	<u>\$966.31</u>	<u>\$2,388.04</u>	<u>\$1,421.73</u>

RECEIVED
JUL 23 1976
FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY

PRIMARY ALLOCATION FOR THE PRESIDENT FORD COMMITTEE

ADVOCATE TRAVEL

II TRIPS RECOMPUTED

b) Trips where information is insufficient

<u>ADVOCATE</u>	<u>DATES</u>	<u>TRIPS</u>	<u>COST</u>	<u>PFC ALLOCATION</u>	<u>STIPULATED ALLOCATION</u>	<u>AMOUNT DUE</u>
BUTZ, Earl	5/27-6/7/76	DC-LA-SD-LA-Mtry Fresno-LA-Tampa-DC	\$776.41	\$17.32	\$341.62	\$324.30
GOROG, William	6/1-4/76	DC-Ohio-DC	373.18	91.00	164.20	73.20
KLEPPE, Thomas	5/4/76	DC-Portland-DC	596.74	11.05	29.27	18.22
	3/10-12/76	DC-IL-ND-DC	592.22	19.74	260.58	240.84
	3/31-4/1/76	DC-Grand Fork-DC	344.98	12.32	31.04	18.72
KNAUER, Virginia	5/31-6/4/76	DC-SF-Reading-Sac-LA-DC	612.84	39.90	269.65	229.75
LYNN, James	4/15-20/76	DC-Tucson-DC-NY-DC	390.00	72.00	171.86	99.86
SEIDMAN, William	5/12-15/76	DC-Mich-DC	426.19	162.35	187.52	25.17
TOWER, John	5/8-9/76	Hawaii-LA-DC	810.00	-0-	356.40	356.40
			<u>\$4,922.56</u>	<u>\$425.68</u>	<u>\$1,812.14</u>	<u>\$1,386.46</u>

Computation: $\frac{\text{Total PFC Allocation}}{\text{Total Suggested Allocation}} \times \text{Cost}$

44% average

Total Due: $\frac{\$1,421.73}{1,386.46}$
\$2,808.19

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY

)

and

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on November 10, 1977, the Commission determined by a vote of 6-0 to accept the Conciliation Agreement submitted by the FEC General Counsel in the above-captioned matter.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

7894101027

November 4, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 190/198 Team #1 Athy

78040011028
Please have the attached Conciliation Report on
MUR 190/198 distributed to the Commission and placed
on the Compliance Agenda for the Commission meeting of
November 10, 1977.

Thank you.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

7374022

7374022

7374022

7374022

7374022

7374022

7374022

7374022

November 4, 1977

Before the Federal Election Commission

In the Matter of) MUR 190 (76)
)
) and
The President Ford Committee) MUR 198 (76)

CONCILIATION REPORT

7 3 0 4 0 0 1 1 0 3 0
This matter arose out of notarized complaints by Charles H. Beecher (MUR 190) and Anthony Martin-Trigona (MUR 198), each alleging that the President Ford Committee had underestimated the costs of seven trips by Commerce Secretary Elliot Richardson and Treasury Secretary William Simon. On March 16, 1977, the Commission found that the reported costs of five of their trips violated 2 U.S.C. §434(b).

Respondent has now indicated that it will sign the attached conciliation agreement and stipulation, both of which were worked out after a substantial process of negotiation that included a review of all reported travel by Ford Administration staff members. We recommend acceptance.

The conciliation agreement follows the approach generally described in our May 9, 1977, memorandum to the Commission. Measuring the cost allocation of the five trips in terms of a formula described by respondent's general counsel in November 19, 1975 testimony to the Commission (Paragraph C, Subdivision 3), the Agreement concludes

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

that the amounts allocated resulted "in an unreasonably low reimbursement by the respondent to the United States Treasury," (Paragraph C, Subdivision 3; Paragraph D, Subdivision 3). Thus, the Agreement requires that respondent reimburse the sum of \$688 to the United States Treasury and make all appropriate amendments in its reports (Paragraph D, Paragraphs 4, 5).

Respondent has also indicated throughout the negotiation process that because of the uncertain state of law at the time of the trips, the agreement should contain a disclaimer as to an admission of a violation. In our May 9, 1977 Memorandum, we recommended inclusion of such a provision. Based on our understanding that the disclaimer was a proper issue for negotiation, we herewith renew our recommendation (the disclaimer is found in Paragraph E, Subdivision 1).

Also attached is a Stipulation which applies the principles of the Conciliation Agreement to the costs reported of all other campaign-related travels by members of the Ford Administration. The Stipulation covers 30 additional trips as to which there was an underestimate of costs and requires a total reimbursement of \$2,808.19, as well as appropriate reporting amendments. (Stipulation, Claim 5.) Since the Agreement and Stipulation* appear to reach all possible instances of misallocation in reported advocate travel during the 1976 President Ford Campaign, a clause has been inserted in the stipulation indicating that "unless violated, [they]

*The Stipulation follows a review by the Office of Compliance and Disclosure of 54 trips by Ford Administration officials. These represent the entire reported total of campaign activity in this area.

shall constitute a complete bar to further action by the Commission on all matters which were or might have been alleged in connection with the subject matter [of MURs 190 and 198]."

11/4/77
Date

William C. Oldaker
General Counsel

78040011032

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

November 4, 1977

CONCILIATION AGREEMENT

In the Matter of :
The President Ford Committee : MUR 190 (76)
: and
: MUR 198 (76)
Respondent :

7804001103
Complaints having been filed under the Federal Election Campaign Act of 1971, as amended (hereinafter referred to as the "Act"), specifically 2 U.S.C. § 437g, with the Federal Election Commission (hereinafter referred to as the "Commission") against the President Ford Committee (hereinafter referred to as the "Respondent"), the Commission having made the determinations required by 2 U.S.C. § 437 g (a)(5) relative to the alleged violations and the Respondent having voluntarily cooperated in supplying information and records during the course of the investigation, the Commission and Respondent do hereby resolve and conciliate the above-captioned matters under review pursuant to 2 U.S.C. § 437g(a)(5)(A) by agreeing as follows:

A. That the Commission has jurisdiction over the Respondent and the subject matter of this complaint.

B. That the Respondent has had a reasonable opportunity to demonstrate that no action should be taken against it.

OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

7304001103

C. That the pertinent facts in this matter are as follows:

1. Expenditures relative to the following trips are the subject matter of this action:

a. Sec. Simon*	Raleigh, N.C., Columbia, S.C.	1-20-76
b. Sec. Simon	Mississippi & Florida	2-10-76
Sec. & Mrs. Simon	Texas & Alabama	2-16-76
c. Sec. & Mrs. Simon	New York City	3-30-76
d. Sec. Richardson*	Los Angeles	5-10/11-76
e. Sec. Richardson	Birmingham & Alabama	4-28-76

2. The costs and allocation figures for these trips, as supplied by Respondent, are set forth in Appendix I.

3. The Respondent through its General Counsel, specifically related in testimony before the Commission on November 19, 1975, concerning the Commission's then proposed allocation regulation, a formula for allocating the costs for political activity for trips that included non-candidate related activity.

* William Simon, Secretary of Treasury
* Elliot Richardson, Secretary of Commerce

Respondent stated: "I would say in that case that it would be our view that we would apportion the time spent of say, a candidate's aide or campaign manager in proportion to the time spent . . . we would allocate the campaign time spent in proportion to his official time and prorate that against an allocable portion of his expenses, dual allocation." Respondent's statements involve an allocation based on campaign time divided by the total of campaign time and other business time.

4. That § 106.3(C)(1) of the regulations adopted by the Commission to implement the provisions of the Federal Election Campaign Act of 1971, as amended, states:

Where an individual, other than a candidate, conducts campaign related activity on a trip, the portion of the trip attributed to each candidate shall be allocated on a reasonable basis.

D. Wherefore, Respondent and Commission agree as follows:

1. It is acknowledged that the 1976 primary and general elections were the first such elections to be governed by the Federal Election Campaign Act, as amended; that portions of the previous campaign act had been found unconstitutional by the Supreme Court in Buckley v. Valeo, 424 U.S. 1 (1976), and that the regulations were not promulgated by the Commission until April 12, 1977 (42 F.R. 19324).

7874771103
2. That the allocation formula as stated by the Respondent was reasonable in light of the relevant statutory provisions and the standards proposed by the Commission in its draft regulations.

3. That although the aforementioned method of allocation was generally reasonable, its application to the above mentioned trips has [inadvertently] resulted in an unreasonably low reimbursement by the Respondent to the United States Treasury.

4. That using the Respondent's stated formula of allocating campaign time in proportion to official time in determining the expense to be allocated, the sum of \$688.00 when added to the amounts previously allocated results in a reasonable allocation for the trips mentioned herein.

5. Respondent will reimburse the United States Government \$688.00 and will amend the appropriate reports filed pursuant to 2 U.S.C. § 434 to reflect this expenditure.

5. The parties also agree that the stipulation appended hereto shall be incorporated and made a part of this agreement.

E. General Provisions

1. It is understood that this agreement does not

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

constitute an admission by the Respondent of any violation of the Federal Election Campaign Act of 1971, as amended.

2. The Commission on request of anyone filing a complaint under 2 U.S.C. § 437(g)(a)(1) concerning the matters at issue herein, or on its own motive may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court of the District of Columbia.

3. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

4. It is agreed that Respondent shall leave no more than 30 days from when this agreement becomes effective to comply with and implement the requirements contained in this agreement.

Dated:

WILLIAM C. OLDAKER
General Counsel for the Commission

ROBERT P. VISSER
General Counsel for the President
Ford Committee

FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

7 8 0 4 1 0 1 1 0 3 3
PRIMARY ALLOCATION FOR THE PRESIDENT FORD COMMITTEE

ADVOCATE TRAVEL

II TRIPS RECOMPUTED

b) Trips where information is insufficient

<u>ADVOCATE</u>	<u>DATES</u>	<u>TRIPS</u>	<u>COST</u>	<u>PFC ALLOCATION</u>	<u>STIPULATED ALLOCATION</u>	<u>AMOUNT DUE</u>
BUTZ, Earl	5/27-6/7/76	DC-LA-SD-LA-Mtry Fresno-LA-Tampa-DC	\$776.41	\$17.32	\$341.62	\$324.30
GOROG, William	6/1-4/76	DC-Ohio-DC	373.18	91.00	164.20	73.20
KLEPPE, Thomas	5/4/76	DC-Portland-DC	596.74	11.05	29.27	18.22
	3/10-12/76	DC-IL-ND-DC	592.22	19.74	260.58	240.84
	3/31-4/1/76	DC-Grand Fork-DC	344.98	12.32	31.04	18.72
KNAUER, Virginia	5/31-6/4/76	DC-SF-Reading-Sac-LA-DC	612.84	39.90	269.65	229.75
LYNN, James	4/15-20/76	DC-Tucson-DC-NY-DC	390.00	72.00	171.86	99.86
SEIDMAN, William	5/12-15/76	DC-Mich-DC	426.19	162.35	187.52	25.17
TOWER, John	5/8-9/76	Hawaii-LA-DC	810.00	-0-	356.40	356.40
			<u>\$4,922.56</u>	<u>\$425.68</u>	<u>\$1,812.14</u>	<u>\$1,386.46</u>

Computation: $\frac{\text{Total PFC Allocation}}{\text{Total Suggested Allocation}} \times \text{Cost}$

44% average

Total Due: \$1,421.73
1,386.46

\$2,808.19

FEDERAL ELECTION COMMISSION
 OFFICIAL FILE COPY

PRIMARY ALLOCATION FOR THE PRESIDENT FORD COMMITTEE

7 3 ADVOCATE TRAVEL 0 3 7

II TRIPS RECOMPUTED

a) Trips where sufficient data is available

<u>ADVOCATE</u>	<u>DATES</u>	<u>TRIPS</u>	<u>COST</u>	<u>PFC ALLOCATION</u>	<u>STIPULATED ALLOCATION</u>	<u>AMOUNT DUE</u>
MATTHEWS, David	1/23/76	DC-Chicago-DC	\$130.00	\$12.00	\$32.50 ~	\$20.50
	5/2-4/76	DC-LA-DC	445.15	8.90	57.86	48.96
SEIDMAN, L. William	6/30-7/2/76	DC-Chi-Albuq-Col Spring-DC	260.00	28.25	80.60 .	52.35
ZARB, Frank	10/15-16/76	DC-LA-Dallas-DC	538.60	215.35	236.98	21.63
USERY, William	5/12-13/76	DC-Detroit-Chicago- DC	106.00	9.00	46.64	37.64
			<u>\$8,365.61</u>	<u>\$966.31</u>	<u>\$2,388.04</u>	<u>\$1,421.73</u>

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

PRIMARY ALLOCATION FOR THE PRESIDENT FORD COMMITTEE

7 3 ADVOCATE TRAVEL 0 1 1

II TRIPS RECOMPUTED:

a) Trips where sufficient data is available

<u>ADVOCATE</u>	<u>DATES</u>	<u>TRIPS</u>	<u>COST</u>	<u>PFC ALLOCATION</u>	<u>STIPULATED ALLOCATION</u>	<u>AMOUNT DUE</u>
BAKER, James	4/9-11/76	DC-Houston-DC	\$273.00	\$10.00	\$27.30	\$17.30
RICHARDSON, Elliot	3/26-29/76	Vail-SF-Sac-DC	645.29	21.25	103.36	81.99
BUTZ, Earl	1/12-14/76	DC-Chi-D'Moines-DC	327.84	25.90	36.66	10.16
	2/25-31/76	DC-LA-San Angelo-DC	413.00	63.00	128.33	65.03
	3/23-29/76	DC-Sacra-LA-Phoenix LA-Fresno-LA	568.00	20.00	68.00	48.16
	5/9-11/76	DC-Minn-Memphis-Chi- Knoxville-DC	212.00	7.00	93.00	86.28
	5/19-20/76	DC-Kansas-DC	285.00	21.87	51.30	29.43
	6/17/76	DC-Indiana-Idaho- Fresno-Spokane-DC	310.00	37.00	136.40	99.40
HILLS, Carla	5/23-26/76	DC-SF-LA-SD-LA-DC	754.98	155.10	286.89	131.79
KLEPPE, Thomas	5/25-26/76	DC-Chi-Fargo-DC	407.75	21.46	40.77	19.31
	4/21-23/76	DC-Salt Lake-Dallas-DC	475.50	13.98	42.79	28.81
KOBELINSKI, Mitchell	5/6-7/76	DC-Billing-DC	492.20	71.05	211.64	140.59
	6/3/76	DC-Cleveland-DC	167.00	43.42	73.48	30.06
LYNCH, Margaret	3/29-30/76	DC-Milwaukee-DC	237.00	30.00	54.51	24.51
	4/30-5/26/76	DC-Seattle-Portland Spokane-Seattle-DC	739.50	86.50	325.38	238.88
	5/28-6/6/76	DC-Vancouver- Columbus-DC	577.80	65.28	254.23	188.95

FEDERAL ELECTION COMMISSION
 OFFICIAL FILE COPY
 OFFICE OF GENERAL COUNSEL

7 3 0 4 0 0 1 1 0 4 1

APPENDIX

<u>ADVOCATE</u>	<u>TRIP & DATES</u>	<u>COST LISTED</u>	<u>PFC ALLOCATION</u>
1. Simon	1/20/76 Raleigh, N.C. Columbia, S.C.	\$2,310 for air charter	\$17.00
2. A. Simon	2/10/76 through 2/13/76 Mississippi & Florida	\$2,209.60 listed as flight and food	\$243.43
B. Simon & Mrs. Simon	2/16/76 Texas and Alabama	\$2,209.60 listed as flight and food	\$201.16
3. Simon & Mrs. Simon	3/30/76 New York City	\$644.76 air charter	\$29.01
4. Richardson	5/10/76 5/11/76 Los Angeles	\$1,144.00 air fare for Richardson and aide	\$57.00
5. Richardson	4/28/76 Atlanta Birmingham Memphis	\$388.00 listed as air fare for advocate and aide and miscellaneous	\$17.00

FEDERAL ELECTRONIC COMMUNICATIONS
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

November 4, 1977

Before the Federal Election Commission

In the Matter of :
: STIPULATION
The President Ford Committee :

7 3 3 4 0 0 1 1 0 4 3

The Federal Election Commission and the President Ford Committee have entered into a conciliation agreement with respect to two complaints (MURs 190 and 198) involving the allocation of costs of certain trips made by members of President Ford's Administration which involved business conducted on behalf of the 1976 President Ford election campaign. Pursuant to said conciliation, the Commission, with the voluntary consent and cooperation of the President Ford Committee, has reviewed records of all Ford Administration officials who were reported as having incurred costs on behalf of the President's campaign. The Commission and President Ford Committee herewith stipulate and agree as follows:

1. The Respondent through its General Counsel, specifically related in testimony before the Commission on November 19, 1975, concerning the Commission's then proposed allocation regulation, its formula for allocating the costs for political activity for trips that included non-candidate related activity. Respondent stated: "I would say in that case that it would be our view that we apportion the time spent of say, a candidate's aide or campaign manager in proportion to the time spent . . . we would allocate the campaign time spent in proportion to his

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

official time and prorate that against an allocable portion of his expenses, dual allocation." These statements indicate an allocation approach based on campaign time divided by the total of campaign time and other business time.

2. That the allocation formula as stated by the President Ford Committee was reasonable in light of the relevant statutory provisions and the standards proposed by the Commission in its draft regulations.

3. That, although the aforementioned method of allocation was generally reasonable, its application to 35 trips has inadvertently resulted in an unreasonably low reimbursement by the President Ford Committee to the United States Treasury. The costs of five of these trips are summarized in the conciliation agreement in MURs 190 and 198. The costs of the remaining trips are summarized in Appendix I of this Stipulation.

4. Using the President Ford Committee's stated formula noted in paragraph 1 herein, the sum of \$2,808.19, when added to the amounts previously allocated, results in a reasonable allocation for the trips mentioned herein.

5. The President Ford Committee will reimburse the United States Government \$2,808.19 and amend the appropriate reports filed pursuant to 2 U.S.C. § 434 to reflect this expenditure.

FEDERAL BUREAU OF INVESTIGATION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

780400711041
6. This agreement and the Conciliation Agreement in MURs 190 and 198, unless violated, shall constitute a complete bar to further action on all matters which were or might have been alleged in connection with the subject matter herein, as described in the introductory paragraph of the Stipulation.

7. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

8. It is agreed that Respondent shall leave no more than 30 days from when this agreement becomes effective to comply with and implement the requirements contained in this agreement.

DATED:

ROBERT P. VISSER
General Counsel for the President
Ford Committee

WILLIAM C. OLDAKER
General Counsel for the Commission

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

A-27
204



FEDERAL ELECTION COMMISSION

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

July 28, 1977

MEMORANDUM

TO: BILL OLDAKER

THROUGH: ORLANDO B. POTTER *OB.P.*
STAFF DIRECTOR

FROM: *RPC* BOB COSTA/DREW MCKAY *DM*

SUBJECT: PRESIDENTIAL PRIMARY AUDIT REPORT

Attached for your review and comment is the audit report on the President Ford Committee (Primary period). If you have any questions, please contact Rick Halter or Joe Stoltz.

Attachment as stated

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



CRAMER, HABER & BECKER
ATTORNEYS AT LAW
475 L'ENFANT PLAZA, S.W.
SUITE 4100
WASHINGTON, D. C. 20024



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

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO:

FROM:

RE: MUR 190/198

Attached is a draft conciliation agreement which we believe should be utilized in the above-numbered MURs in place of the one proposed by Respondent (also attached). The Staff Agreement attempts, whenever possible, to incorporate the language of Respondent's Agreement. A Summary of the Major charges is as follows:

1. Introductory language, Respondent's agreement indicates that it has voluntarily provided the Commission with "all relevant and material facts in the matter." The modification expresses the idea that respondent voluntarily cooperated in supplying information (though notices only all information). Also added is the fact that the Commission found reasonable cause to believe that respondent had committed a violation.

2. Pertinent facts: None are set forth in respondent's agreement. This seems to us to be a serious omission and we have included what appear to us to be the relevant information. Respondent has indicated that the inclusion of a statement of facts would be acceptable, but has not specified with any particularity what facts it deems relevant.

3. Admission of a violation: Respondent argues strenuously that it should not be obliged to admit a violation, that its allocation approach was generally reasonable, in light of existing statutes and Commission policy, and that all that it is guilty of here is are "unusually low reimbursement" (Respondent, paragraphs A, C, D and E). The draft attempts to preserve this general logic, though with greater particularity. It sets forth indicating form, a generally reasonable allocation formula, as stated by Respondent's counsel during Commission hearings;



FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

but omitted in respondent's proposed agreement. The staff agreement (Part IV, paragraphs A-C) also does not call for admission of a violation by respondent, but specifically states that under the given facts there has been an "unreasonably (rather than unusually) low reimbursement" for the trips at issue. This tracks the reasonable language of the applicable Commission regulation (§106.3(c)(1)).

7 8 9 4 7 7 1 1 0 4 1 1
4. Amount to be paid to U.S. Treasury: There appears to be no disagreement over the figure -- \$688 -- since this is based on Commission calculations (respondent asserts that its cost data for each trip is definitive). However, respondent's agreement accords any mention of how this sum was arrived at (Part III, p. 4). The staff agreement cites the application of general allocation formula set forth by Visser in his Commission Testimony as the basis for the further cost allocation (Part IV, subdivision D). This has the effect of making the agreement an "example" of one potentially reasonable form of cost allocation.

5. Other similar trips: Respondent's agreement is intended to bar Commission action on any other similar trips (Part I, subdivision A). The staff agreement eliminates this clause on the theory that the conciliation agreement can only cover the facts at issue in a particular case. However, the issue is a vital one to respondent and not without consequence since an analysis by the Compliance Review Section indicates that there may be approximately a dozen more trips where there was also an unreasonable cost allocation. Thus, respondent does face the possibility of further compliance action, either pursuant to a private complaint or to Commission action. The Commission may wish to attach a cover letter to the conciliation agreement expressing its views on this subject.

CONCILIATION AGREEMENT

Between)
)
The Federal Election Commission,)
) MUR 190 (76)
and) and
) MUR 198 (76)
The President Ford Committee)
)
Respondent)

78040011042
Complaints having been filed under the Federal Election Campaign Act of 1971, as amended, (hereinafter referred to as the "Act") specifically 2 U.S.C. §437g with the Federal Election Commission (hereinafter referred to as the "Commission") against the President Ford Committee (hereinafter referred to as the "Respondent"), the Commission having made the determinations required by 2 U.S.C. §437 (b) (a) (5) relative to the alleged violations and the respondent having voluntarily cooperated in supplying information and records during the course of the investigation. The Commission and respondent do hereby resolve and conciliate the above captioned matters under review pursuant to 2 U.S.C. §437g(a)(5)(A) by agreeing as follows:

I. That the Commission has jurisdiction over the respondent and the subject matter of this complaint.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

II. That the Respondent has had a reasonable opportunity to demonstrate that no action should be taken against it.

III. That the pertinent facts in this matter are as follows:

A. Expenditures relative to the following trips are the subject matter of this action:

	<u>ADVOCATE</u>	<u>LOCATION</u>	<u>DATE</u>
1.	Sec. Simon*	Raleigh N.C., Columbia S.C.	1-20-76
2.	Sec. Simon Sec. & Mrs. Simon	Mississippi & Florida Texas & Alabama	2-10-76 2-16-76
3.	Sec. & Mrs. Simon	New York City	3-30-76
4.	Sec. Richardson*	Los Angeles	6-10/11-76
5.	Sec. Richardson	Birmingham & Alabama	4-28-76

* William Simon, Secretary of Treasury
* Elliot Richardson, Secretary of Commerce

B. That the costs and allocation figures for these trips, as supplied by respondent, are set forth in Appendix 1.

C. The Respondent through its General Counsel, specifically related in testimony before the Commission on November 19, 1975 concerning the Commission's then proposed allocation regulation, its formula for allocating

78040011050

FEDERAL BUREAU OF INVESTIGATION
OFFICE OF THE ATTORNEY GENERAL
U.S. DEPARTMENT OF JUSTICE

the costs for political activity for trips that included non-candidate related activity. Respondent stated: "I would say in that case that it would be our view that we would apportion the time spent of say, a candidate's aide or campaign manager in proportion to the time spent . . . we would allocate the campaign time spent in proportion to his official time and prorate that against an allocable portion of his expenses, dual allocation."

D. That §106.3(C)(1) of the regulations adopted by the Commission to implement the provisions of the Federal Election Campaign Act of 1971, as amended states:

Where an individual, other than a candidate, conducts campaign related activity on a trip, the portion of the trip attributed to each candidate shall be allocated on a reasonable basis.

IV. Wherefore, Respondent and Commission agree as follows:

A. That the allocation formula as stated by the respondent was not unreasonable in light of the relevant statutory provisions and the standards proposed by the Commission in its draft regulations.

B. That although the aforementioned method of allocation was generally reasonable, its application to the above mentioned trips has resulted in an unreasonably low reimbursement by the Respondent to the United States Treasury.

FEDERAL ELECTION COMMISSION
OFFICIAL RECORD
BUREAU OF LEGAL COUNSEL

C. That using the respondent's stated formula of allocating campaign time in proportion to official time in determinating the expenses to be allocated, the sum of \$688.00 when added to the amounts previously allocated results in a reasonable allocation for the trips mentioned herein.

D. Respondent will reimburse the United States Government \$688.00 and will amend the appropriate reports filed pursuant to 2 U.S.C. §434 to reflect this expenditure.

V. General Provisions

A. It is understood that this agreement does not constitute an admission by the Respondent of any violation of the Federal Election Campaign Act of 1971, as amended.

B. It is acknowledged; that the 1976 primary and general elections were the first such elections to be governed by the Federal Election Campaign Act, as amended; that portions of the previous campaign act had been found unconstitutional by the Supreme Court in Buckley v. Valeo, 424 U.S. 1 (1976), and that the regulations were not promulgated by the Commission until April , 1977.

C. Except as provided below the Commission hereby waives realeases and covenants pursuant to §437g (a) (5) (A)

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

of the Act, not to sue the Respondent with respect to any matters which were alleged in this matter.

D. The Commission on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning the matters at issue herein, or units own motive may review compliance with this agreement. If the Commission believes that this agreement on any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court of the District of Columbia.

E. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

F. It is agreed that Respondent shall leave no more than 30 days from this agreement becomes effective to comply with and implement the requirements contained in this agreement.

DATE

WILLIAM C. OLDAKER
GENERAL COUNSEL
FOR THE COMMISSION

ATTORNEY FOR THE PRESIDENT
FORD COMMITTEE

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

APPENDIX

<u>ADVOCATE</u>	<u>TRIP & DATES</u>	<u>COST LISTED</u>	<u>PFC ALLOCATION</u>
1. Simon	1/20/76 Raleigh, N.C. Columbia, S.C.	\$2,310 for air charter	\$ 17.44
2. A. Simon	2/10/76 thru 2/13/76 Mississippi & Florida	\$2,209.60 listed as flight and food	\$243.43
B. Simon & Mrs. Simon	2/16/76 Texas and Alabama	" "	\$201.16
3. Simon & Mrs. Simon	3/30/76	\$615.75 air charter	\$ 29.01
4. Richardson	5/10/76 5/11/76 Los Angeles	\$1,144.00 air fare for Richardson and aide	\$ 57.00
5. Richardson	4/28/76	\$388.00 listed as air fare for advocate and aide and miscellaneous	\$ 17.00

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

7 5 0 1 1 0 0 7 0 8 2



FEDERAL ELECTION COMMISSION

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

May 9, 1977

MEMORANDUM TO: The Commission

FROM: William Oldaker *W. Oldaker*

SUBJECT: MUR 190, MUR 198, Conciliation Agreements

Attached is a draft conciliation agreement prepared by staff in lieu of an agreement proposed by respondent. Respondent's draft is also appended. (Each draft is appropriately marked.) The major differences between the drafts are as follows:

1. Respondent's draft seeks to bar Commission action on the costs of all other advocate trips similar to those at issue (e.g., trips which "might have been alleged by complainants"--Respondent's Draft, Part I, subd. B). Such an action, if taken, would appear to have a substantial effect; an analysis by the Office of Compliance and Disclosure indicates that an unreasonably low allocation may have been made with respect to at least ten other advocate travel trips and that the final number of such cases may even be as high as 100 trips. The Commission could seek to have the cost allocation methods for the five trips specifically named in MURs 190 and 198 applied to all other similar trips. On the other hand, since no firm guidelines for "reasonableness" have been established in the allocation area, the Commission may wish to avoid imposing the approach utilized with respect to the five trips in an across-the-board manner. The staff draft sets forth the alternative approaches to this issue without making a recommendation.

2. Introductory language: Respondent's draft indicates that respondent has voluntarily provided the Commission with "all relevant and material facts in the matter." The staff draft expresses the idea that respondent voluntarily cooperated in supplying information and records (though not necessarily all information). Also added is the fact that the Commission found reasonable cause to believe that respondent had committed a violation.



FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

3. Pertinent facts: None are set forth in respondent's draft. This seems to us to be a serious omission and we have included what appears to us to be the relevant information. Respondent has indicated that the inclusion of a statement of facts would be acceptable, but has not specified with any particularity what facts it deems relevant.

4. Admission of a violation: Respondent's draft states that it should not be obliged to admit a violation, that its allocation approach was generally reasonable, in light of existing statutes and Commission policy, and that all that it is guilty of here is an "unusually low reimbursement" (Respondent, paragraphs A, C, D and E). The staff draft accepts respondent's position that no admission of a violation is necessary and that the allocation approach utilized was generally reasonable. The staff draft then sets forth respondent's allocation method, as stated by its counsel during Commission hearings on the allocation regulation (respondent's draft is silent in this regard). The staff states that under the given facts there has been an "unreasonably (rather than unusually) low reimbursement" for the trips at issue. This tracks the reasonableness language of the applicable Commission regulation (§106.3(c)(1)).

5. Amount to be paid to U.S. Treasury: There appears to be no disagreement over the figure--\$688--since this is based on Commission calculations. (In this regard, we accept respondent's underlying premise that the cost data it has supplied to the Commission for costs of the trips is complete.) However, respondent's draft avoids any mention of how this sum was arrived at (Part III, p. 4). The staff agreement cites the application of the general allocation approach set forth by respondent's counsel (noted, supra) as the basis for the further cost allocation (Part IV, subdivision D). This has the effect of making the agreement an "example" of one potentially reasonable form of cost allocation.

The staff draft eliminates all language in respondent's draft as to future intentions in the cost allocation area (Part II, Subd. A). In our opinion, this is beyond the scope of a conciliation agreement.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

CONCILIATION AGREEMENT

Between :
THE FEDERAL ELECTION COMMISSION, : MUR 190 (1976)
and : and
THE PRESIDENT FORD COMMITTEE, : MUR 198 (1976)
Respondent :
: : : : : : : : : : : : : : : :

7 8 0 4 0 1 0 3 2
Complaints having been filed under the Federal Election Campaign Act, as amended, (hereinafter referred to as the "Act") specifically 2 U.S.C. §437g, with the Federal Election Commission (hereinafter referred to as the "Commission") against the President Ford Committee (hereinafter referred to as the "Respondent"), said complaints having been fully investigated, and the Respondent having voluntarily provided to the Commission all relevant and material facts in the matter, the parties do resolve and conciliate the above-captioned matters under review, pursuant to 2 U.S.C. §437g(a)(5)(A), as follows:

Part I General Provisions

A. As set forth more fully herein, it is understood that this Agreement does not constitute an admission by the Respondent of any violation of the Federal Election Campaign Laws.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

B. The Commission hereby waives, releases and covenants, pursuant to Section 437g(a)(5)(A) of the Act, not to sue the Respondent with respect to any matters which were or might have been alleged in the above-captioned matters under review filed with the Commission.

C. The Commission agrees that the allocation formula utilized by the Respondent for non-candidate-related travel expenses was not unreasonable in light of the relevant statutory provisions and the standards proposed by the Commission in its draft regulations.

D. The Commission and Respondent agree that although the aforementioned method of allocation was generally reasonable, its application to several of the trips under review appears to have resulted in an unusually low reimbursement by the Respondent to the United States Treasury.

E. The Commission and Respondent acknowledge that the 1976 primary and general elections were the first such elections to be governed by the Federal Election Campaign Act, as amended; that portions of the previous campaign Act had been found unconstitutional by the Supreme Court in Buckley v. Valeo; that the regulations promulgated by the Commission were not in force and effect until five (5) months after the general election; that a general standard for allocation of non-candidate-related travel expenses was adopted by the Commission because no one specific method of allocation could be determined

73040011033
FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

therefore, appropriate for all such travel activity; and, finally, that in testimony before the Commission the Respondent specifically disclosed, without objection by the Commission members or staff, its methods of allocation for non-candidate related travel expenses.

Part II. Special Provisions

A. Throughout the primary and general election periods, the Respondent was fully committed to the policy and practice of adherence to the Federal Election Campaign Laws and the draft regulations as proposed, and revised, by the Commission. Respondent reaffirms this commitment.

B. Based on its experience during the 1976 Federal elections, the Commission intends to enunciate a policy position through regulations and specific example, regarding that which it would consider a "reasonable" allocation of travel expenses pursuant to Section 106.3(c)(1) of the Regulations; this further interpretation will include the Commission's position that, when a time allocation method is utilized in future Federal elections, a reasonable portion of the non-candidate related travel expenses attributed to, and reported by, a candidate's principal campaign committee, should be based on a percentage of the individual's "active time."

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Part III. Monetary Provision

Accordingly, in view of the aforementioned general and special provisions, and in order to expedite the dissolution and termination of Respondent political committee, Respondent agrees to reimburse the United States Treasury \$688.00; said amount constitutes a sum of money agreed upon by all parties as a result of informal methods of conference, conciliation and persuasion in order to terminate the above-captioned matters under review. Respondent will also amend its Report, filed pursuant to 2 U.S.C. §434, to include such expenditures made on behalf of Respondent's candidate.

Part IV. Signatures

7 8 0 4 I have read the foregoing Conciliation Agreement and
I accept and agree to the provisions contained therein:

Date

Attorneys for Respondent
The President Ford Committee

I recommend approval of this Conciliation Agreement

**FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL**

Date

Attorneys for The Federal Election
Commission

I concur in the above recommendation for approval of
this Conciliation Agreement:

Date

General Counsel for
The Federal Election Commission

Approved on behalf of The Federal Election Commission:

Date

Chairman of the Federal Election
Commission

7 8 0 4 9 7 1 0 6 1
FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

STAFF'S DRAFT CONCILIATION
AGREEMENT

CONCILIATION AGREEMENT

Between)
)
The Federal Election Commission,)
) MUR 190 (76)
and) and
) MUR 198 (76)
The President Ford Committee)
)
Respondent)

7 3 0 4 0 0 1 1 0 6 ?
Complaints having been filed under the Federal Election
Campaign Act of 1971, as amended, (hereinafter referred to
as the "Act") specifically 2 U.S.C. §437g with the Federal
Election Commission (hereinafter referred to as the
"Commission") against the President Ford Committee (herein-
after referred to as the "Respondent"), the Commission
having made the determinations required by 2 U.S.C. §437
(b) (a) (5) relative to the alleged violations and the
respondent having voluntarily cooperated in supplying
information and records during the course of the investigation.
The Commission and respondent do hereby resolve and conciliate
the above captioned matters under review pursuant to 2 U.S.C.
§437g (a) (5) (A) by agreeing as follows:

I. That the Commission has jurisdiction over the
respondent and the subject matter of this complaint.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

II. That the Respondent has had a reasonable opportunity to demonstrate that no action should be taken against it.

III. That the pertinent facts in this matter are as follows:

A. Expenditures relative to the following trips are the subject matter of this action:

	<u>ADVOCATE</u>	<u>LOCATION</u>	<u>DATE</u>
1.	Sec. Simon*	Raleigh N.C., Columbia S.C.	1-20-76
2.	Sec. Simon Sec. & Mrs. Simon	Mississippi & Florida Texas & Alabama	2-10-76 2-16-76
3.	Sec. & Mrs. Simon	New York City	3-30-76
4.	Sec. Richardson*	Los Angeles	6-10/11-76
5.	Sec. Richardson	Birmingham & Alabama	4-28-76

- * William Simon, Secretary of Treasury
- * Elliot Richardson, Secretary of Commerce

B. That the costs and allocation figures for these trips, as supplied by respondent, are set forth in Appendix 1.

C. The Respondent through its General Counsel, specifically related in testimony before the Commission on November 19, 1975 concerning the Commission's then proposed allocation regulation, its formula for allocating

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

the costs for political activity for trips that included non-candidate related activity. Respondent stated: "I would say in that case that it would be our view that we would apportion the time spent of say, a candidate's aide or campaign manager in proportion to the time spent . . . we would allocate the campaign time spent in proportion to his official time and prorate that against an allocable portion of his expenses, dual allocation."

D. That §106.3(C)(1) of the regulations adopted by the Commission to implement the provisions of the Federal Election Campaign Act of 1971, as amended states:

Where an individual, other than a candidate, conducts campaign related activity on a trip, the portion of the trip attributed to each candidate shall be allocated on a reasonable basis.

IV. Wherefore, Respondent and Commission agree as follows:

A. That the allocation formula as stated by the respondent was not unreasonable in light of the relevant statutory provisions and the standards proposed by the Commission in its draft regulations.

B. That although the aforementioned method of allocation was generally reasonable, its application to the above mentioned trips has resulted in an unreasonably low reimbursement by the Respondent to the United States Treasury.

7304001106
RECEIVED
JAN 11 1972
U.S. DEPT. OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION

C. That using the respondent's stated formula of allocating campaign time in proportion to official time in determinating the expenses to be allocated, the sum of \$688.00 when added to the amounts previously allocated results in a reasonable allocation for the trips mentioned herein.

D. Respondent will reimburse the United States Government \$688.00 and will amend the appropriate reports filed pursuant to 2 U.S.C. §434 to reflect this expenditure.

E. Alternative 1 (no application to similar cases):

The Commission hereby waives, releases and covenants, pursuant to Section 437g(a)(5)(A) of the Act, not to sue the Respondent with respect to any matters which were or might have been alleged in the above-captioned matters under review filed with the Commission.

Alternative 2 (agt. applied to similar cases):

Respondent also agrees to apply the allocations approach described herein, Part III, Subd. C, to all other instances of advocate travel for which an unreasonably low cost allocation was made for advocate travel. (A list of such instances would be appended to the agreement.)

V. General Provisions

A. It is understood that this agreement does not constitute an admission by the Respondent of any violation of the Federal Election Campaign Act of 1971, as amended.

78043011063
FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

B. It is acknowledged that the 1976 primary and general elections were the first such elections to be governed by the Federal Election Campaign Act, as amended; that portions of the previous campaign act had been found unconstitutional by the Supreme Court in Buckley v. Valeo, 424 U.S. 1 (1976), and that the regulations were not promulgated by the Commission until April 13, 1977 (42 FR 19324).

C. Except as provided below the Commission hereby waives releases and covenants pursuant to §437g(a)(5)(A) of the Act, not to sue the Respondent with respect to any matters which were alleged in this matter.

D. The Commission on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning the matters at issue herein, or on its own motive may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court of the District of Columbia.

E. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

F. It is agreed that Respondent shall leave no more than 30 days from this agreement becomes effective to comply with and implement the requirements contained in this agreement.

DATE _____

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

WILLIAM C. OLDAKER
GENERAL COUNSEL
FOR THE COMMISSION

ATTORNEY FOR THE PRESIDENT
FORD COMMITTEE

78040011067

RECEIVED ELECTORAL COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

APPENDIX

<u>ADVOCATE</u>	<u>TRIP & DATES</u>	<u>COST LISTED</u>	<u>PFC ALLOCATION</u>
1. Simon	1/20/76 Raleigh, N.C. Columbia, S.C.	\$2,310 for air charter	\$ 17.44
2. A. Simon	2/10/76 thru 2/13/76 Mississippi & Florida	\$2,209.60 listed as flight and food	\$243.43
B. Simon & Mrs. Simon	2/16/76 Texas and Alabama	" "	\$201.16
3. Simon & Mrs. Simon	3/30/76	\$615.75 air charter	\$ 29.01
4. Richardson	5/10/76 5/11/76 Los Angeles	\$1,144.00 air fare for Richardson and aide	\$ 57.00
5. Richardson	4/28/76	\$388.00 listed as air fare for advocate and aide and miscellaneous	\$ 17.00

FEDERAL ELECTION COMMISSION
 OFFICIAL FILE COPY
 OFFICE OF GENERAL COUNSEL

1 9 0 1 1 0 0 7 0 8 2



FEDERAL ELECTION COMMISSION

1325 K STREET NW.
WASHINGTON, D.C. 20463

March 30, 1977

MEMORANDUM

TO: ANDY ATHEY *AK*
THROUGH: *AW* DREW MCKAY/BOB COSTA/JOE STOLTZ *JS*
FROM: RICK HALTER *RH*
SUBJECT: REASONABLENESS OF ALLOCATION OF ADVOCATE EXPENSES
DURING PRESIDENT FORD COMMITTEE (PFC) PRIMARY
CAMPAIGN

7 3 1 4 1 0 6 1
The attached September 28, 1976, memo from Robert P. Visser, General Counsel PFC, describes the methods prescribed for allocation between campaign and non-campaign related expenses incurred by individuals, other than the President or Senator Dole, during the primary campaign. Regarding the General Election campaign, certain substantive amendments were made and are not relevant to the primary campaign discussion below. Allocation of General Election advocate expenses will be discussed, if necessary, after said field work has been completed.

According to Mr. Visser, both methods outlined were discussed with OGC staff and also discussed during the FEC public hearings on allocation. Mr. Visser felt that the methods utilized by PFC were acceptable to the OGC and the Commission, subject to audit concerning proper classification of official vs. political activity and NOT concerning which method(s) were to be used to computing the pro rata share of expenses to be borne by PFC, since either method had been deemed acceptable to FEC according to Mr. Visser.

The examples listed below were selected from PFC's Advocate Travel files. These examples are included to illustrate, what CPS believes to be an unreasonably small percentage of total expenses charged to PFC as a result of the application of the "Time Spent Method" of allocation. One example of "Direct Cost Method" is also included.



FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Advocate & Position	Total Cost of Trip ^{1/}	Total Hours	Cost Per Hour	PFC Hours	Allocated to PFC	
Earl Butz ^{2/} Sec. of Agriculture	\$568.00	144	\$4.00*	5	\$ 20.00	
Thomas Kleppe Sec. of Interior	354.00	42	8.30	21	174.30	
Virginia Knauer Spec. Asst. To Pres. for Consumer Affairs	190.00	42	4.50	1	4.50	
Carla Hills Sec. of HUD	754.98	80	9.40	16.5	155.10	
W.J. Usery Sec. of Labor	Allocation Basis: Difference between cost of airfare coach: DC to Chicago \$82.00 one way DC to Detroit to Chicago <u>91.00</u> one way 9.00 Detroit ground expenses paid by PFC					9.00
L. Wm. Seidman Asst. to President, Economic Affairs	555.73	74	7.50	4	30.00	
Elliott Richardson Sec. of Commerce	572.00	30	19.00	3	57.00	
David Mathews Sec. of HEW	445.15	50	8.90	1	8.90	
Thomas Kleppe Sec. of Interior	596.74	54	11.05	1	11.05	

*Figures rounded in some instances.

1/ PFC used coach fare rate even if advocate flew first class.

2/ Back-up expense reports available upon request.

Please note that the listing above is not a comprehensive listing of all travel vouchers which the allocation methods described herein have been applied by PFC during the primary campaign. Additional audit time would be required to perform a 100% review of the Advocate Travel files maintained by PFC. Absent any objection to the contrary, no further audit work will be pursued until some basis of reasonableness or other guidance is prescribed by the Commission.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

In closing, CRS offers two alternative methods of computing PFC's allocable portion of an advocate's expenses. An example will be used to illustrate these suggested alternative methods:

Method One: CRS' Variation of Time Spent Method

Advocate: David Mathews, Sec'y of HEW

Trip from DC to LA to DC, 5/2/76 - 5/4/76

Several modifications and new terminology is used and accordingly explained below.

(a) Effective trip time is defined as total trip time per advocate's itinerary less down time, i.e. time spent on purely personal business plus the elapsed time from the end of a given business day to the start of the next business day.

(b) PFC related hours is computed by taking $\frac{1}{2}$ of the transportation time from the point of origin through intermediary PFC stops and return to point of origin plus actual time spent by advocate at PFC event(s).

COMPUTATION:

Total trip hours per itinerary	50hr
Less: down time	30hr 02"
Effective trip time	19hr 58"
PFC actual time spent	1hr 30"
50% flight time applicable	6hr 04"
Total PFC time spent	7hr 34"

FORMULA:

$\frac{7.5 \text{ hours PFC time}}{20.0 \text{ hours effective trip time}}$	$\times \$445.15 \text{ Cost} = \$169.16 \text{ PFC cost allocable}$
---	--

Method Two: CRS Variation of Direct Cost Method

Allocation of trip expenses to PFC would be based on (1) 50% of transportation cost from point of origin through PFC related intermediary stops and return to point of origin plus (2) 100% of ground expenses at exclusively PFC related stops plus (3) 50% of ground expenses at dual purpose stops (official/personal and PFC related). This method would not necessitate as much detailed computational time as the CRS variation of the time spent method, however, the PFC portion of cost would not, in our opinion, be as accurate.

COMPUTATION: 50% of applicable transportation cost \$184.00
50% of ground expenses (dual purpose stop) 38.58
Total PFC portion of allocable cost 222.58

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

PFC's Application of their Time Spent Method

$$\frac{1 \text{ hr (1}\frac{1}{2} \text{ hrs rounded down, actual elapsed time of PFC event)}}{50 \text{ hrs (total trip time per advocate's itinerary)}} \times \$445.15$$

(cost)

equals \$8.90(PFC portion of allocable cost)

SUMMARY

	Amount Allocated to PFC	Difference PFC vs. CRS
Actual amount paid by PFC	\$ 8.90	
Amount allocable per CRS variation of time spent method	169.16	+\$160.26
Amount allocable per CRS variation of direct cost method	222.58	+ 213.68

CRS believes that either of the methods suggested are reasonable and may be consistently applied by PFC utilizing the advocate's itinerary and associated cost schedule in PFC records.

cc: Dan Swillinger
Charlie Steele

1 Enclosure, 5 pages

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

used 9/28/76
as applicable to
primary for
Mr. Visser

President Ford Committee

3825 L STREET, N.W., SUITE 250, WASHINGTON, D.C. 20038 (202) 457-6400

PENCIL Notes

RHalter

FEC Auditor

3/3/77

September 28, 1976

MEMORANDUM

FROM: Robert P. Visser, General Counsel
T. Timothy Ryan, Assistant General Counsel

RE: ALLOCATION OF CAMPAIGN EXPENSES -- ADVOCATES

The Federal Election Commission ("FEC") recently forwarded to Congress its proposed regulations. Section 106 deals with the allocation of campaign expenses. The President Ford Committee ("PFC") intends to abide by and follow the Commission's recommendations in this area pending any action to the contrary by Congress. Accordingly, set forth below are the pertinent provisions of the regulations with comment and example, where relevant:

\$106.3 ALLOCATION OF EXPENSE BETWEEN CAMPAIGN AND NON-CAMPAIGN RELATED TRAVEL

"(a) All expenditures for campaign related travel paid for by a candidate from a campaign account or by his or her authorized committee or by any other political committee shall be reported.

* * * * *

(c) (1) Where an individual, other than a candidate, conducts campaign-related activities on a trip, that portion of the trip attributed to each candidate shall be allocated on a reasonable basis.

* * * * *

OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Emphasis should be placed on the following aspects of this provision:

I. INDIVIDUALS OTHER THAN THE CANDIDATE

A. General Rule

Individuals other than the President or Senator Dole (e.g., advocates), who conduct both campaign-related and non-campaign-related activity at a stop must reasonably allocate

their expenses on the basis of the time they spend at campaign-related activity or some other reasonable method of allocation.

B. Transportation Expenses

(1) Transportation expenses by individuals other than the President or Senator Dole which involve only campaign-related activity must be attributed in toto to the PFC expenditure limitation.

(2) Transportation expenses by individuals other than the President or Senator Dole which involve both campaign-related and non-campaign-related activity (e.g., official travel) must be reasonably allocated so that an appropriate portion of the expenses are attributed to the PFC expenditure limitation.

C. Additional Expenses

All other campaign-related expenses by individuals other than the President or Senator Dole must be attributed to the PFC expenditure limitation.

II. EXAMPLES OF ALLOCATION OF INTERSTATE TRAVEL EXPENSES

A. Example No. 1

An advocate appears in New York as a speaker, in his official capacity, at a Chamber of Commerce dinner on a Friday. He also represents the President Ford Committee at a Saturday morning campaign-related event in Buffalo, New York. Cumulatively, the advocate spends twenty-two hours away from Washington, D. C. participating in both official and PFC activities. The flight from Washington, D. C. to New York City takes one hour; another one hour is spent in flight from New York City to Buffalo, and one hour is spent returning to Washington, D. C. Seven hours are used in New York on official business at the Chamber of Commerce dinner and meetings with local officials. Five hours are spent in Buffalo at the related event. The total cost of the trip for the advocate is \$500, which includes the cost of transportation, meals and a room in New York. Under the aforementioned FEC regulations, a reasonable portion of this trip's expenses must be attributed to the PFC's expenditure limitation and such expenses must be paid for by the PFC. Since more than 50 percent of the advocate's active time is spent on official business, the flight time between New York City and Washington, D. C. and Buffalo and Washington, D. C. is counted as official time. The following allocations would be appropriate in this hypothetical situation:

PFC flight
Official
flight time
official
PFC
assumed sleeping
cumulative
total
PFC
official
sleeping
function; Active time - waking working hours
60% official active time

RECEIVED
OFFICIAL COPY
OFFICE OF GENERAL COUNSEL

1. Direct Cost Method

A. Official

(1)	Cost of airfare: Washington, D.C. to New York and return	\$200
(2)	Cost of meals and room in New York City	75
(3)	Cost of ground transportation in New York	<u>25</u>
	Subtotal	\$300

B. PFC

(1) PFC Expenditure Limitation

(a)	Difference, if any, between roundtrip airfare for New York City to D.C. and cost of transportation from Buffalo to Washington, D.C.	\$ 25
(b)	Cost of airfare New York City to Buffalo	100
(c)	Ground costs in Buffalo	<u>75</u>
	Subtotal	<u>\$200</u>

TOTAL \$500

2. Time Spent Method

(A)	Cost of trip	\$500
(B)	Percentage of total time devoted to political activities (6 hours out of 22 hours)	27%
(C)	Total costs attributed to political activities and paid by PFC -- 27% of \$500	\$135
(D)	Total costs attributed to official activities and paid by government -- 73% of \$500	<u>\$365</u>

TOTAL \$500

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040011071

B. Example No. 2

An advocate appears in Seattle as a speaker at an official Chamber of Commerce dinner on a Friday night. On Saturday, he participates in a number of PFC events. Cumulatively, the advocate spends thirty (30) hours away from Washington, D. C. participating in both official and PFC activities. The flight takes four hours to Seattle and four hours to return to Washington, D.C. Four hours are spent either at the Chamber of Commerce dinner or in transit to this event. The remainder of the advocate's time is spent at PFC events or on personal time (overnight and other meals). Since over 50 percent of the advocate's active time is spent at PFC activity, the time spent in flight is attributed to the PFC. The total cost of the trip is \$1,000, which includes the cost of transportation, meals and a room in Seattle. Under the FEC regulations, a reasonable portion of this trip's expenses must be attributed to the PFC expenditure limitation and such expenses must be paid for by the PFC. The following allocations would be appropriate:

1. Direct Cost Method

(A) Official

(1)	Cost of meal at Chamber of Commerce event	\$ 25
(2)	Transportation to Chamber of Commerce event	<u>75</u>
	Subtotal	\$100

(B) PFC

(1) PFC Expenditure Limitation

(a)	Cost of airfare	\$600 ✓
(b)	Cost of meals and room in Seattle	200
(c)	Ground transportation and miscellaneous expenses	<u>100</u>
	Subtotal	\$900

2. Time Spent Method

(A) Cost of trip

(B) Percentage of total time devoted to political activity (26 hours out of 30)

87%

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

\$1000

no. flight
no. official Active
no. PFC/inactive

7394001107

by sleep to PFC intx. r +
+ in Example = 1

100% PFC

(C)	Total costs attributed to political activities and paid by PFC -- 87% of \$1000	\$ 870
(D)	Total costs attributed to official activities and paid by the government -- 13% of \$1000	\$ 130
	TOTAL	\$1000

IV. ACTIVITIES

78940011072

In conclusion, it must be emphasized that the Hatch Act restrictions apply to most staff assistants working with the various advocates. Accordingly, such individuals should not actively participate in any political activity. In addition, you should remember that official activities--speeches before non-partisan groups, such as trade, labor or professional associations--must remain non-political. In other words, the advocate's activities at such functions should not appear to involve political activities for the benefit of or on behalf of any Federal candidate. This requirement does not, however, preclude full, fair and open discussion of national issues, current conditions and trends, and existing or proposed administrative or legislative programs which are within the expertise of the Cabinet Member. What it does preclude is advocacy of a candidate for Federal office or making partisan political comment about a candidate or political party.

Questions regarding this memorandum or the legality or propriety of any official, political, or mixed official/political activity should be directed to the office of the Counsel to the President.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

used 9/28/76
as applicable to
Primary for
Mr. Visser

President Ford Committee

1828 L STREET, N.W., SUITE 250, WASHINGTON, D.C. 20036 (202) 457-6400

PENCIL NOTES

RHalter
FEC Auditor
3/3/77

September 28, 1976

MEMORANDUM

FROM: Robert P. Visser, General Counsel *RPV*
T. Timothy Ryan, Assistant General Counsel *TR*

RE: ALLOCATION OF CAMPAIGN EXPENSES -- ADVOCATES

The Federal Election Commission ("FEC") recently forwarded to Congress its proposed regulations. Section 106 deals with the allocation of campaign expenses. The President Ford Committee ("PFC") intends to abide by and follow the Commission's recommendations in this area pending any action to the contrary by Congress. Accordingly, set forth below are the pertinent provisions of the regulations with comment and example, where relevant:

\$106.3 ALLOCATION OF EXPENSE BETWEEN CAMPAIGN AND NON-CAMPAIGN RELATED TRAVEL

"(a) All expenditures for campaign related travel paid for by a candidate from a campaign account or by his or her authorized committee or by any other political committee shall be reported.

* * * * *

(c) (1) Where an individual, other than a candidate, conducts campaign-related activities on a trip, that portion of the trip attributed to each candidate shall be allocated on a reasonable basis.

* * * * *

Emphasis should be placed on the following aspects of this provision:

I. INDIVIDUALS OTHER THAN THE CANDIDATE

A. General Rule

Individuals other than the President or Senator Dole (e.g., advocates), who conduct both campaign-related and non-campaign-related activity at a stop must reasonably allocate

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

their expenses on the basis of the time they spend at campaign-related activity or some other reasonable method of allocation.

B. Transportation Expenses

(1) Transportation expenses by individuals other than the President or Senator Dole which involve only campaign-related activity must be attributed in toto to the PFC expenditure limitation.

(2) Transportation expenses by individuals other than the President or Senator Dole which involve both campaign-related and non-campaign-related activity (e.g., official travel) must be reasonably allocated so that an appropriate portion of the expenses are attributed to the PFC expenditure limitation.

C. Additional Expenses

All other campaign-related expenses by individuals other than the President or Senator Dole must be attributed to the PFC expenditure limitation.

II. EXAMPLES OF ALLOCATION OF INTERSTATE TRAVEL EXPENSES

A. Example No. 1

An advocate appears in New York as a speaker, in his official capacity, at a Chamber of Commerce dinner on a Friday. He also represents the President Ford Committee at a Saturday morning campaign-related event in Buffalo, New York. Cumulatively, the advocate spends twenty-two hours away from Washington, D. C. participating in both official and PFC activities. The flight from Washington, D. C. to New York City takes one hour; another one hour is spent in flight from New York City to Buffalo, and one hour is spent returning to Washington, D. C. Seven hours are used in New York on official business at the Chamber of Commerce dinner and meetings with local officials. Five hours are spent in Buffalo at the related event. The total cost of the trip for the advocate is \$500, which includes the cost of transportation, meals and a room in New York. Under the aforementioned FEC regulations, a reasonable portion of this trip's expenses must be attributed to the PFC's expenditure limitation and such expenses must be paid for by the PFC. Since more than 50 percent of the advocate's active time is spent on official business, the flight time between New York City and Washington, D. C. and Buffalo and Washington, D. C. is counted as official time. The following allocations would be appropriate in this hypothetical situation:

PFC flight
Official
flight time
official
PFC
hours
assumed sleeping
cumulative
total

PFC
official
sleeping

function; Active time - waking working hours
= 60% official active time

1. Direct Cost Method

A. Official

(1)	Cost of airfare: Washington, D.C. to New York and return	\$200
(2)	Cost of meals and room in New York City	75
(3)	Cost of ground transportation in New York	<u>25</u>
	Subtotal	\$300

B. PFC

(1) PFC Expenditure Limitation

(a)	Difference, if any, between roundtrip airfare for New York City to D.C. and cost of transportation from Buffalo to Washington, D.C.	\$ 25
(b)	Cost of airfare New York City to Buffalo	100
(c)	Ground costs in Buffalo	<u>75</u>
	Subtotal	<u>\$200</u>
	TOTAL	\$500

2. Time Spent Method

(A)	Cost of trip	\$500
(B)	Percentage of total time devoted to political activities (6 hours out of 22 hours)	27%
(C)	Total costs attributed to political activities and paid by PFC -- 27% of \$500	\$135
(D)	Total costs attributed to official activities and paid by government -- 73% of \$500	<u>\$365</u>
	TOTAL	\$500

78049011080
FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

B. Example No. 2

An advocate appears in Seattle as a speaker at an official Chamber of Commerce dinner on a Friday night. On Saturday, he participates in a number of PFC events. Cumulatively, the advocate spends thirty (30) hours away from Washington, D. C. participating in both official and PFC activities. The flight takes four hours to Seattle and four hours to return to Washington, D.C. Four hours are spent either at the Chamber of Commerce dinner or in transit to this event. The remainder of the advocate's time is spent at PFC events or on personal time (overnight and other meals). Since over 50 percent of the advocate's active time is spent at PFC activity, the time spent in flight is attributed to the PFC. The total cost of the trip is \$1,000, which includes the cost of transportation, meals and a room in Seattle. Under the FEC regulations, a reasonable portion of this trip's expenses must be attributed to the PFC expenditure limitation and such expenses must be paid for by the PFC. The following allocations would be appropriate:

1. Direct Cost Method

(A) Official

(1)	Cost of meal at Chamber of Commerce event	\$ 25
(2)	Transportation to Chamber of Commerce event	<u>75</u>
	Subtotal	\$100

(B) PFC

(1) PFC Expenditure Limitation

(a)	Cost of airfare	\$600 ✓
(b)	Cost of meals and room in Seattle	200
(c)	Ground transportation and miscellaneous expenses	<u>100</u>
	Subtotal	\$900

2. Time Spent Method

(A) Cost of trip \$1000

(B) Percentage of total time devoted to political activity (26 hours out of 30) 87%

his flight
his official Active
his PFC inactive

787477110

by sleep to PFC in ex. r +
+ in example #1

✓ COACH FARE

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
DIVISION OF RECORDS & COMMUNICATIONS

(C)	Total costs attributed to political activities and paid by PFC -- 87% of \$1000	\$ 870
(D)	Total costs attributed to official activities and paid by the government -- 13% of \$1000	\$ <u>130</u>
	TOTAL	\$1000

IV. ACTIVITIES

7 3 0 4 0 0 1 1 0 0 3

In conclusion, it must be emphasized that the Hatch Act restrictions apply to most staff assistants working with the various advocates. Accordingly, such individuals should not actively participate in any political activity. In addition, you should remember that official activities--speeches before non-partisan groups, such as trade, labor or professional associations--must remain non-political. In other words, the advocate's activities at such functions should not appear to involve political activities for the benefit of or on behalf of any Federal candidate. This requirement does not, however, preclude full, fair and open discussion of national issues, current conditions and trends, and existing or proposed administrative or legislative programs which are within the expertise of the Cabinet Member. What it does preclude is advocacy of a candidate for Federal office or making partisan political comment about a candidate or political party.

Questions regarding this memorandum or the legality or propriety of any official, political, or mixed official/political activity should be directed to the office of the Counsel to the President.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION

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

March 25, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert P. Visser, Esq.
President Ford Committee
1828 L. Street, N. W.
Washington, D. C. 20036

RE: MUR 190 (76)
MUR 198 (76)

Dear Mr. Visser:

This is to notify you that with respect to the above matter the Commission determined that there was reasonable cause to believe that a violation of 2 U.S.C. §434(b) has occurred with respect to the following trips at issue in this matter: Secretary Simons trips to (1) Raleigh, N. C. on January 20, 1976, (2) to Mississippi, Florida, Alabama and Texas on February 10-16, 1976, (3) New York City on March 30, 1976; and (4) Secretary Richardsen's trip to Los Angeles, California on May 11, 1976 and (5) Memphis, Tennessee and Birmingham, Alabama on April 28, 1976. The Commission determined that the application of your allocation formula was not reasonable for each of their trips.

In accordance with the provision of 2 U.S.C. §437g (a) (5) (A) the Commission shall endeavor for a period of thirty days to correct this violation "by informal methods of conference, conciliation, and persuasion." This will be done in an informal basis by myself in coordination with members of my staff.

Sincerely yours,

William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

6C

● **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..... 15¢

☒ Show to whom, date, & address of delivery.. 35¢

☐ RESTRICTED DELIVERY.
Show to whom and date delivered..... 65¢

☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. **ARTICLE ADDRESSED TO:**

Robert P. Visser

3. **ARTICLE DESCRIPTION:**

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438121	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

B. Meier

4. **DATE OF DELIVERY**

5. **ADDRESS** (Complete only if requested)

6. **UNABLE TO DELIVER BECAUSE:**

POST OFFICE
1601 N. MAIN
ST. LOUIS, MO 63103

☆ GPO : 1976 O-203-686

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of the)
)
)
President Ford Committee)

MUR 190 (76)
MUR 198 (76)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on March 16, 1977, the Commission determined by a vote of 6-0 that there was Reasonable Cause to Believe that a violation of 2 U.S.C. §434(b) had occurred in the above-captioned matter.

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040010085



FEDERAL ELECTION COMMISSION

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

March 14, 1977

MEMORANDUM TO: The Commission

FROM: William C. Oldaker *WCO*

SUBJECT: MUR 190 & 198

730401108
In the General Counsel's Report previously submitted in this matter we have asked the Commission to find reasonable cause to believe that the Ford Committee has failed to allocate on a reasonable basis the costs of campaign related activities in five trips by Secretary Richardson and Secretary Simon.

In its meeting of March 2, 1977, the Commission indicated that it wished to have the Office of General Counsel articulate with greater particularity the factual basis for its conclusions and the approach that would be taken during the conciliation process. Accordingly, we now submit this addendum to our previous recommendation.

1. In its initial response in this matter, by letter dated August 10, 1976, the President Ford Committee stated that allocation for the trips in question were based "either on the direct attributable costs incurred for political activity or on a basis of the time spent for political activity during the trips." Although it would appear to us as a general matter that either a cost or a time approach might be reasonable given the particular facts of the present matter, it appears that neither approach has been reasonably applied.

In the table attached to this memo we have summarized the available data for the five trips using in all cases figures supplied by the respondent. For the trips to Raleigh, N.C. and Columbia, S.C. on January 20, 1976,



Mississippi, Florida, Alabama and Texas on February 10, and 16, 1976, New York City on March 30 and Los Angeles on May 11, 1976, it appears that a time allocation approach was used. However, not only did the PFC fail to include all relevant costs but they failed to attribute a share of the non business time (travel, rest, overnight, etc.) to the political time. For example on Richardson's trip to Los Angeles nearly half of the business time was spent on political related activity yet, only one tenth of the cost was so allocated.

For the Birmingham and Memphis trip by Richardson on April 28, 1976 it appears that a direct cost formula was used. The committee allocated \$17 which was "the difference between air fare from Washington, to Memphis and Washington, D.C. and Birmingham." This figure is justified by the claim that the Birmingham political trip was scheduled after the Memphis trip. Since a substantial portion of this entire trip was politically related a greater share of the entire costs should be directly attributed to the political activity. Although the exact manner of calculation is not set forth, based on the information provided the PFC has not utilized either the time allocation or the direct cost approach in a reasonable manner.

The respondent claims that the Commission has had notice of its allocation formulas since its representative, Robert Visser testified before the Commission on November 19, 1975. However, the thrust of this testimony was devoted merely to the general proposition that when a trip had a mixture of political and official business, expenditures should be allocated on a pro rate basis rather than counted in their entirety. Although alluding briefly to a time allocation approach as a method of prorating, Mr. Visser's testimony appears to indicate that such prorating would include only official time and campaign time:

"I would say in that case [e.g., a trip that contains a mixture of official business and campaign related business] that it would be our view that we would apportion the time spent of, say, a candidate aide or campaign manager in proportion to the time spent -- we would allocate the campaign time spent in proportion to his official time and prorate that against an allocable portion of his expenses, dual allocation." (emphasis added).

UNITED STATES SENATE
ELECTION COMMISSION
FILE COPY
DATE OF JOURNAL FORWARDED

Thus, in effect, Mr. Visser appears to have stated that the time allocation approach set forth herein -- e.g., an allocation of campaign time in proportion to total trip time -- would not be utilized.

2. Although we are of the view that the cost reporting used by the President Ford Committee in this matter cannot be characterized as reasonable, we believe that the question of what is reasonable should not be quantified in terms of a single formula prior to the conciliation process. One approach that could be used as suggested by the General Counsel's Report, is an allocation based on campaign time/business time. However, we do not mean to imply that this is the only possible basis for resolving this matter, nor that the approach utilized herein would necessarily be appropriate in resolving another case with different factual parameters. In the event that the Commission finds reasonable cause in this matter, we would expect to report back, after negotiation with respondent with a more definite formulation.

78041103
FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL
OFFICE FILE COPY

Advocate	Trip & Dates	Cost Listed	Are all costs set forth	PFC Time	Total Business Time	Total Time	PFC Allocation	Suggested Allocation
1. Simon	1/20/76 Raleigh, N.C. Columbia, S.C.	\$2310 for air charter	NO	30-70 mins. (est.)	4hrs. 15 mins. (est.)	11hrs. 30 mins.	\$17.44	\$120.00
2. A. Simon	2/10/76 thru 2/13/76 Miss. & Fla.	\$2,209.60 listed as flights and food	NO	2 hrs. 45mins.	12 hrs. (approx)	70 hrs.	\$243.43	not available without further cost figures
B. Simon & Mrs. Simon	2/16/76 Texas & Alabama	" "	NO	2 hrs. 40mins.	4 hrs.	14 hrs.	201.16	
3. Simon & Mrs. Simon	3/30/76	\$615.75 air charter	NO	1 hr. 55 mins.	3hrs. 15mins.	9 hrs. 45 mins	\$29.01	\$140.00
4. Richardson	5/10/76 5/11/76 Los Angeles	\$1,144.00 air fare for Richardson and aide	NO	3 hrs.	3hrs. 20 mins.	30 hrs.	\$57.00	\$240.00
5. Richardson	4/28/76	\$388.00 listed as air fare for advocate and aide and miscellaneous	NO	6 1/2 hrs.	8 hrs.	30 hrs.	\$17.00	\$110.00

7
8
7
4
0
0
1
1
FEDERAL ELECTION COMMISSION
OFFICE OF CENTRAL COUNCIL
OFFICIAL FILE COPY

200 508
NEW

CRAMER, HABER & BECKER

ATTORNEYS AT LAW

WILLIAM C. CRAMER
RICHARD M. HABER
BENTON L. BECKER
MICHAEL A. MILWEE
GORDON M. STRAUSS
KENNETH M. BELLIS
JAN M. PEDERSON

475 L'ENFANT PLAZA, S. W.
SUITE 400
WASHINGTON, D. C. 20024

TELEPHONE 554.1100
AREA CODE 202

TELEX: ITT 440048

OF COUNSEL

F. LAWRENCE MATTHEWS

May 20, 1977

771618

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

Re: MUR 198 (1976) and MUR 190 (1976)

Dear Mr. Oldaker:

As a result of the meeting at your office last Friday between Tim Ryan and myself on behalf of the President Ford Committee and you and several members of your staff, this is to confirm our understanding that the Federal Election Commission (FEC) has directed the FEC Audit Staff to review additional PFC records with regard to Advocate travel during the 1976 Presidential election campaign. As in the past, the PFC has agreed to fully cooperate with you and other FEC staff members in the conduct of such inquiry. In order to expedite matters, I would appreciate it if you would advise members of your Audit and Legal staff to direct any and all inquiries with regard to these matters directly to me.

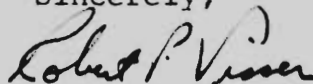
It is our further understanding, that despite the fact that we have fully supplied you with information which would result in the immediate resolution of the above-referenced matters by our proposed conciliation agreement, this agreement will be held in abeyance pending the resolution of any further questions that may be raised with regard to the entire Advocate travel program and the application of the PFC's allocation formula with regard to such travel expenditures.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

William Oldaker, Esquire
Page 2
May 23, 1977

We appreciate your attention to these matters and look forward to hearing from you in the very near future with a view toward an early resolution of these matters.

Sincerely,



Robert P. Visser

RPV/ch

cc: James A. Baker, III, Esquire
Mr. Tom Moran

7 3 7 4 7 7 1 1 0 9 1

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

CC 1975-48(3)
cc: Commissioner
ETH

THE WHITE HOUSE

WASHINGTON

September 3, 1975

Dear Mr. Curtis:

This is in response to Notice 1975-38 (F.R. 40202) in which the Federal Election Commission has sought comments concerning a request from the campaign manager for Mr. Louis Wyman for an opinion of the FEC General Counsel on several questions relating to possible travel by "President Ford and former Governor Reagan" to New Hampshire for the purpose of endorsing Mr. Wyman in the September 16, 1975, special Senatorial election. The General Counsel has proposed for Commission review an opinion responding to this request which states, in part, as follows:

"Presidential expenditures in connection with such a visit provide unique problems of attribution. It would be illogical, and unnecessarily restrictive, to require the attribution of the actual cost of a presidential campaign foray. Hence, only the equivalent commercial rates will be chargeable against an incumbent President's individual contribution limitations and against the candidate's overall expenditure limitation. Expenses for accompanying staff personnel will be charged against the foregoing limitations only if such staff personnel serve primarily as advance persons or other campaign staff members and do not provide support services to the Office of the President. Additionally, special costs attendant upon Ford's office as President, such as the Secret Service, police and medical attention, are not to be included within this amount. These costs are relatively fixed and are related to Ford's position as President and not to his political function as head of his party."

In the form of comment on this one provision, we wish to bring to your attention the manner in which we intend to apportion the various costs incurred to operate government-owned aircraft on which the President and accompanying government personnel travel to and from localities where the President appears for other than official purposes. As the General Counsel's proposed opinion indicates, expenditures for such travel by the President present problems that are unique to his Federal office, in that the President must continue to perform in his official capacity at the same time he undertakes political activities.

For this reason, whenever the President travels, regardless of the purpose of the particular trip, he is accompanied by a number of persons who are present to support him in his official role. For example, certain members of the White House staff, military aides, medical aides, Secret Service and communications personnel are present not for any political purpose, but solely to provide the President with support which in many cases they are required by law to perform. The Secret Service, in particular, is required by P.L. 90-331 to provide protection to "major Presidential and Vice Presidential" candidates at the direction of the Secretary of the Treasury and on the basis of consultation with an advisory committee of bipartisan congressional membership.

(1) Costs of Operating Government-Owned Aircraft on Political Trips

When the President travels on a trip which entails only political stops, the cost of operating the Government-owned aircraft that are used to transport the President can be readily determined from the enclosed hourly rate schedule, used by the Department of Defense to recover its costs from other government agencies that use military aircraft. In our view, the costs of transporting any persons aboard the aircraft who are traveling for political purposes should be borne by the appropriate political committee. On the other hand, the costs of transporting those persons who are traveling for the purpose of supporting the Office of the President should not be attributed to a political committee.

For the purpose of the President's future travels, we will identify those individuals who could be considered to be present for a

7844011093
OFFICE OF THE GENERAL COUNSEL
U.S. DEPARTMENT OF JUSTICE

political purpose. We plan to treat as political travelers the President and First Family, political committee officials, certain White House and other officials, who may perform some political activities, and any other persons whose activities could be viewed as political. Although White House officials are present for official support activities, and generally spend a substantial majority, if not all, of their time on official business, we intend to consider the following categories of officials to be political for the purpose of such travel: White House officials who may advise on political matters (e.g., Donald Rumsfeld, Robert Hartmann, John Marsh, Ron Nessen, Richard Cheney, etc.), speechwriters, advance men, and a White House photographer.

7604001100
The remainder of the White House personnel is present for the purpose of supporting the President in his official capacity, e.g., a civilian aide or personal secretary, along with non-White House support personnel, e.g., the Secret Service, military aides, medical and communications personnel, etc. They are not present for any political purpose, and the costs of their travel should not be attributed to a political committee. In this regard, it is our understanding that in 1972 the Secret Service paid up to the cost of comparable first-class airfare for its agents traveling on board chartered aircraft of non-incumbent Presidential candidates.

Therefore, on future Presidential travel the appropriate political committee will be charged by DOD for its pro rata share of the hourly costs of using government-owned aircraft, based on the percentage of the passengers on board who are present mainly or in part for a political purpose.

(2) Costs of Operating Government-Owned Aircraft
on Mixed Official-Political Trips

In most cases, it is not possible to schedule the President's travel in a manner that will allow trips to be solely official or solely political. We believe that the best formula for apportioning the transportation costs on mixed official-political purpose trips is one which may be referred to as the "round trip airfare formula." Under this formula, the political stops are

7604001100
COPY

isolated from the official stops in order to establish the political trip that would have been made if the President did not have the responsibilities of his office. For this purpose, where a particular stop includes both official and political events, it will be treated as a political stop. A stop will be regarded as official when that is its main purpose, even though the President may meet, incidental to the official event, with political figures in an informal and unpublicized meeting, e.g., a private breakfast with a local political figure or greeting a small group of local politicians.

Once the political stops of such a trip have been determined, DOD calculates the cost of that "political" trip and charges the appropriate political committee for its share, as described above, of the costs of the trip, based on the round trip flying time between the initial point of departure, generally, Washington, D.C., and the political stops made. An example might help to clarify this approach. Suppose the President makes a trip from Washington to San Francisco for official purposes, then to Los Angeles for political purposes, and returns to Washington via St. Louis where a stop is made for official purposes. Under this formula, the appropriate political committee is charged for its pro rata share of the hourly costs of a trip from Washington to Los Angeles and return to Washington, even though there was no direct Washington to Los Angeles leg of the flight.

(3) Other Travel Costs

In order to assure that all costs related to the political portion of a trip are treated as political costs, the appropriate political committee will be charged the expenses for each political stop of any member of the Presidential party who is present mainly or in part for a political purpose, as determined above. Thus, political funds will pay the expenses of the President and these other officials, but not the expenses of those persons who are present to support the President entirely in his official capacity.

Such items as communications arrangements, motorcades, automobile rentals, and other miscellaneous items are readily identifiable as to their purpose, and are to be paid by the appropriate political committee when they are for political purposes.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Where an item, such as the cost of a bus for a motorcade involves a mixed purpose, e.g., transporting the members of the Presidential party who are considered to be present for a political purpose, and also those serving the President in his official capacity, the appropriate political committee will bear the full cost of that item.

In every case where a candidate for Federal office is an incumbent, either in an office to which he seeks re-election or in another office, his campaign activities may become intermingled with his official activities, and similar problems will arise in ascertaining which costs he incurs are campaign-related. The proposals herein made provide a reasonable method for resolving such problems.

(4) Services of Government Personnel

For the purpose of identifying the costs of travel to be borne by the appropriate political committee, we understand that it is not necessary to apportion the salaries of those members of the personal staffs of incumbent candidates for Federal office within either the Executive or Legislative Branches who, in addition to their official duties, also participate in some limited political activities. For example, employees "paid from the appropriation for the office of the President" are exempted by 5 U.S.C. 7324(d)(1) from the general prohibition contained in 5 U.S.C. 7324(a)(2) against Executive Branch employees participating in "political management or in political campaigns." This section effectively places the White House staff in a position comparable to that of the personal staffs of members of Congress.

No precise dividing line now exists, nor is one likely to be drawn, which clearly indicates when such employees are performing official duties and when those duties are political. So long as these employees expend a substantial majority (an average in excess of forty hours per week) of their time on official duties, there is no need to attribute any portion of the salaries of such employees to a political committee.

The reason for this letter is to bring to the Commission's attention the means by which we intend to attribute to a political committee the costs of the President's travel for purposes of support of the

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Republican Party, support of specific candidates, or support of his own candidacy. To the extent this treatment may be different from that proposed by the General Counsel, we do not imply that a change need be made in the proposed opinion of such counsel. Rather we believe that the proposed opinion is consistent with the requirements of the applicable law and that if a more liberal attribution of expenses is made to a political committee such is within a candidate's discretion.

We intend to now implement with respect to future travel by the President, this treatment for attribution of such travel costs. We would appreciate very much any comments or suggestions the Commission may think are appropriate to make with respect to our treatment of the President's travel costs.

Sincerely,

Philip W. Buchen
Philip W. Buchen
Counsel to the President

The Honorable Thomas B. Curtis
Chairman
Federal Election Commission
Washington, D.C. 20463

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

73040011097

27000 (Air Force One) (VC-137C)

Cost per hour: \$2,206.00

Passengers: Approximately 50

26000 (Air Force One backup) VC-137C)

Cost per hour: \$2,206.00

Passengers: Approximately 50

Jet Star (VC-140)

Cost per hour: \$ 889.00

Passengers: 8

White Top Helicopter (VH-3A)

Cost per hour: \$ 723.00

Passengers: 12

Huey Helicopter (VH-IN)

Cost per hour: \$ 262.00

Passengers: 8

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

7804001093

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of the)
) MUR 190 (76)
President Ford Committee) MUR 198 (76)

GENERAL COUNSEL'S REPORT

I. Statement of the Case

By notarized complaint, Charles H. Breecher (MUR 190 (76)) and Anthony R. Martin-Trigona (MUR 198 (76)) alleged that the Ford Committee has understated the campaign related costs of seven trips by Commerce Secretary Richardson and Treasury Secretary Simon. It is recommended that the Commission find that there is reasonable cause to believe that the reporting of the costs of five of these trips were in violation of 2 U.S.C. §434(b).

II. Prior Proceedings and Facts

On September 21, 1976, the Commission determined by a vote of 5-1 that there was reason to believe that a violation of 2 U.S.C. §434(b) had been committed. By letter of September 24, the respondent was notified of this determination and requested to submit information relative to the allegations raised. On October 12, 1976 a response

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

to that request was received.

7804001101
The allegations were based primarily on information set forth in a news commentary of July 8 by Evans and Novak and complain of the Ford Committees reporting of trips by Secretary Richardson and Secretary Simon. These trips all allegedly involved political activity on behalf of President Ford by the Secretaries, in addition to official business. The complainants claimed that the allocation of costs for the political activity was insubstantial.

With respect to the seven trips challenged, the request of September 24 asked the respondent to submit: the total cost of each trip; the schedule of activities; the reported cost of each trip and a detailed explanation of the allocation formula by which the committee determined what portion of the total cost of each trip it would report as an expenditure.

The response of the President Ford Committee contained a Department of Commerce memorandum setting forth what is allegedly the total costs of each of the four trips by Mr. Richardson (see Exhibit "A" attached to the response). The total cost data on each of the trips by Mr. Simon

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

7804001101

was reported as unavailable. However, in each case cost allocations were made. The response also contained: travel schedules for each trip (Exhibit "B" thru "I"); the memoranda by the President Ford Committee taking note of the Commission's proposed regulations on travel cost allocation and describing in general the approach alleged herein (Exhibit "J", "K"), and a memorandum, written after the date this MUR was initiated, indicating that "all public appearances" by Cabinet Members after the nomination would be considered campaign related and that after October 16, 1976 there would be no exceptions for "official business" (Exhibit "L", "M").

The President Ford Committee contends, in essence, that its allocation for each of the trips at issue was "reasonable" within the meaning of §106.3(c)(1) of the Commission's proposed regulations and 2 U.S.C. §431f(1)(A), (B). (The particular facts pertinent to each trip are discussed, infra, in the analysis section of this memorandum.) Furthermore, respondent contends that the Federal Election Commission has had notice of its allocation formula since the time Robert Visser testified before the Commission on November, 1975. However, our review of the transcript of

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

that meeting indicates that Mr. Visser spoke of the formula in general terms only. There is no evidence that the Commission was aware of specific applications of the formula until the facts of the present matter were brought to its attention.

III. Legal Analysis

7804001102
Having reviewed all of the pertinent evidence, we are of the view that for 6 of the 7 trips at issue herein, the President Ford Committee has not applied its allocation formula in a "reasonable" manner. For each of the trips it appears that the PFC has allocated costs on the basis of a proportion representing time spent for political activity divided by total time of the trip. This has the effect of excluding all travel time, overnight time and any other non-business time from the campaign-allocable costs of the trip. Furthermore, there appears to be an incomplete rendering of cost data for the trip. We herewith summarize the pertinent facts with respect to each of the five trips to which these conclusions apply:

1. On January 20, 1976 Secretary Simon travelled to Raleigh, N.C. by way of Columbia, S.C. The Committee has relied on Treasury Department estimate of \$17.44 as the cost attributable to it. They calculate this figure

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

by dividing the air charter fee of \$2,310 and the food costs of \$24.03 by eight and then multiplying this figure by 1/20 which is the fraction of the total time determined to be spent on PFC business. This calculation does not adequately include the total costs for that day or a proportionate share of the travel time. It also fails to include time spent for a 50 min reception in Governor Edwards Office for 25 Black Republican leaders.

2. During the period of February 10-16, 1976, Secretary Simon made a trip through Mississippi, Florida, Alabama and Texas. This included a two-day vacation which was not included in the calculations. Total costs are unavailable and the PFC is apparently relying on a Treasury estimate of \$243.43 for candidate activity in Florida and \$201.16 for such activity in Texas and Alabama. Again there is no evidence that the costs used reflect the actual total costs. It should be noted that this trip occurred less than one month before the Florida Presidential Primary and more than half of the time was spent in that state.

3. On March 30, 1976 less than one week before the New York Primary, Secretary and Mrs. Simon traveled to New York City. According to the response submitted, the

Secretary attended two events, one 70 minute function for the PFC and a three hour and fifteen minute reception at the University Club. Again the total costs were not submitted. The PFC has allocated \$29.01 for expenses related to their Committee.

4. On May 10-11, 1976, Secretary Richardson traveled to Los Angeles California. He departed at 5:30 p.m. (EDT) on the tenth of May and returned at 11:39 p.m. (EDT) the following day. Since Mr. Richardson spent only 3 hours of his 30 hours away from Washington on PFC business, one tenth of the air fare or \$57.00 is the amount they allocated even though only 4 hours of this same trip was on official business. This trip occurred less than one month before the California Presidential Primary.

5. On April 28-29, 1976, Secretary Richardson traveled to Birmingham, Alabama and Memphis, Tennessee. In support of the allocation of \$17.00, the respondent states:

"Prior to attending a Chamber of Commerce dinner in Memphis which was a purely official event, the Secretary altered his schedule at the request of the PFC to attend certain PFC related activities in Birmingham, Alabama. Based on a direct cost allocation the PFC paid the \$17.00 difference between air fare from Washington, D.C. to Birmingham. There were no other costs related to the Birmingham event."

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

The sequence in which events are scheduled should not, in our opinion factor in allocating costs. The costs of this six hour swing through Birmingham would have to include an appropriate share of the costs of the entire trip.

6. On April 21-23, 1976, Secretary Simon traveled to Oklahoma. The President Ford Committee indicated that it has reported \$348.67 of the total costs of this trip, but failed to furnish any further particulars as to what these costs were. Absent such information, we are unable to determine whether the allocation is reasonable.

The President Ford Committee has indicated that it paid all expenses incurred in connection with Secretary Richardson's trip to Fort Wayne, Indiana -- \$1,444.68. Accordingly, we are of the view that there is no reasonable cause to believe a violation has been committed with respect to this trip.

On the basis of available evidence, we are of the view that there is reasonable cause to believe that the allocations for each of the five preceding trips represents a violation of 2 U.S.C. §434(b). If respondent is utilizing a cost approach it must include all relevant costs -- food and lodging as well as travel costs; if a time approach is utilized, it would appear necessary to take into account only time spent for official and campaign related

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

780410110

business. Non-business time - e.g., travel, sleep, and vacation hours -- would appear to be irrelevant.

IV. Recommendation

Find Reasonable Cause to Believe as to five trips;
send attached letter.

William C. Oldaker

William C. Oldaker
GENERAL COUNSEL

DATE:

2/28/77

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040011106



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert P. Visser, Esq.
President Ford Committee
1828 L Street
Washington, D.C. 20036

Re: MUR 190 (76)
MUR 198 (76)

Dear Mr. Visser:

7304001107
This is to notify you that with respect to the above matter the Commission determined that there was reasonable cause to believe that a violation of 2 U.S.C. §434(b) has occurred with respect to the following trips at issue in this matter: Secretary Simons trips to (1) Raleigh, N.C. on January 20, 1976, (2) to Mississippi, Florida, Alabama and Texas on February 10-16, 1976, (3) New York City on March 30, 1976; and (4) Secretary Richardsen's trip to Los Angeles California on May 11, 1976 and (5) Memphis Tennessee and Birmingham Alabama on April 28, 1976. The Commission determined that the application of your allocation formula was not reasonable for each of their trips.

In accordance with the provision of 2 U.S.C. §437g (a)(5)(A) the Commission shall endeavor for a period of thirty days to correct this violation "by informal methods of conference, conciliation, and persuasion." This will be done in an informal basis by myself in coordination with members of my staff.

Sincerely yours,

John G. Murphy, Jr.
General Counsel



FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

cc #690
REC'd
G.C. 10-12-76
4:10 P.M.

President Ford Committee

1828 L STREET, N.W., SUITE 250, WASHINGTON, D.C. 20036 (202) 457-6400

October 12, 1976

John G. Murphy, Jr., Esquire
General Counsel
The Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

RE: MUR 190 and 198 (76)

Dear Mr. Murphy:

This letter is in response to your correspondence dated September 24, 1976, which states that the Federal Election Commission (FEC) has determined that it has reason to believe a preliminary investigation should be conducted with regard to the allegations against The President Ford Committee (PFC) set forth in the above-referenced complaints.

I. STATEMENT

On August 10, 1976, you notified Robert C. Moot, Treasurer of the PFC during the primary period, that these complaints had been filed against the PFC and that the FEC was conducting a preliminary inquiry into the matter.

On September 3, 1976, the PFC responded to this notice. In our response we stated that the complaints should be immediately dismissed because (1) neither the Act nor the proposed regulations required the FEC to proceed on the basis of nothing more substantive than a newspaper article, and (2) assuming, *arguendo*, that the campaign laws required a preliminary inquiry into the matter, the relevant facts failed to provide any reason to believe that a violation of the Federal election laws had taken place. In addition, we noted that, save one trip by Secretary of Commerce, Elliott Richardson, all of the trips noted in the complaint involved travel which was primarily official in nature or travel undertaken on behalf of local Republican candidates or committees and were not scheduled as candidate-related activity on behalf of the Ford campaign. Further, we stated that all such PFC related activities, other than Secretary Richardson's

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

John G. Murphy, Jr., Esquire
October 12, 1976
Page Two

trip to Fort Wayne, Indiana, were of a "drop-in" or reception nature and were planned around the existing official schedule of the respective Cabinet member. Finally, we pointed out that PFC activities were scheduled only after the official schedule of the Cabinet member had been finalized.

In sum, our position with regard to the complaints remains unchanged. No additional facts have been alleged to substantiate a finding by the PFC of reason to believe that the President Ford Committee has violated the Act. However, in the spirit of cooperation and with complete confidence that the PFC's allocation formula and its implementation are in full compliance with the Act, the following pertinent material is submitted.

II. INFORMATION REQUESTED

A. Total Cost of Each Trip

Attached hereto as Exhibit A is a memorandum from the United States Department of Commerce setting forth the total costs incurred by that Department and the PFC for the four trips complained of which were taken by Secretary Richardson.

The total cost data for Secretary Simon's trips cannot be provided by the PFC at this time because of his recent foreign travel schedule and the fact that the United States Secret Service must review its files and provide a major portion of the requested data. Although we will attempt to provide this information as soon as possible, we believe that the material provided herewith fully justifies dismissal of these complaints.

B. Schedule of Activities

The schedule of activities which sets forth both the political and official business conducted in each city noted in the aforementioned complaints is submitted as Exhibits B through I. Secretary Simon's schedules are contained in Exhibits B through E. Secretary Richardson's schedules are contained in Exhibits F through I. The exhibits follow the chronological order set forth in the attachments to your September 24, 1976 letter. Those activities which were candidate related are so indicated. Official government activities and non-PFC political activities such as GOP fundraisers are noted along with the pertinent time and location of such activities.

7804001100

OFFICE OF THE ATTORNEY GENERAL
U.S. DEPARTMENT OF JUSTICE

John G. Murphy, Jr., Esquire
October 12, 1976
Page Three

C. Reported Cost of Each Trip

The reported costs of each trip were set forth in our letter of September 3, 1976, and are also contained in the PFC's monthly Reports on file with the Commission. Specifically, the PFC has reported these expenditures as follows:

Trip No. 1

Secretary Simon's trip to Raleigh, N. C.
Paid 6/9/76, Treasurer of the U.S. \$ 17.44
June Report, Line 20, page 65

Trip No. 2

Secretary Simon's trip to Miss., Fla.,
Ala., Texas
Paid 6/9/76, Treasurer of the U.S. \$ 201.16
Paid 6/9/76, Treasurer of the U.S. 243.43
Both: June Report, Line 20, page 65

Trip No. 3

Secretary Simon's trip to New York
Paid 8/23/76, Colgan Airways, of which
\$29.01 applies to New York, \$22.11 to
Philadelphia \$ 51.12
Unitized for September, page 39

Trip No. 4

Secretary Simon's trip to Oklahoma
Paid 6/10/76, Executive Jet Aviation, Inc. \$ 348.67
June Report, page 127

Trip No. 5

Secretary Richardson's trip to Fort Wayne,
Indiana \$1,444.68
Paid 3/31/76, Federal Airways
April Report, Line 20, page 122

Trip No. 6

Secretary Richardson's trip to Los Angeles
California
Paid 7/15/76, Department of Commerce \$ 57.00

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF LEGAL COUNSEL

7804001110

John G. Murphy, Jr., Esquire
October 12, 1976
Page Four

Trip No. 7

Secretary Richardson's trip to Detroit,
Michigan and Wisconsin
All costs charged to Republican Party
of Wisconsin and Congressman Cederberg

NA

Trip No. 8

Secretary Richardson's trip to Tennessee
and Alabama

Paid 7/15/76, Department of Commerce
July Report, Line 20, page 69

\$ 17.00

D. PFC Allocation Formula

A detailed explanation of the PFC allocation formula is contained in our memorandum dated February 23, 1976, set forth as Exhibit J. The memorandum was prepared by this office for the primary election based on the Act and the FEC's proposed regulations. It sets forth the allocation of campaign expenses for advocates, as well as the President, and notes that such expenses must be allocated on a reasonable basis where any individual, other than a candidate, conducts any campaign-related activity on a trip. An updated version of this memorandum was distributed for the general election campaign on September 28, 1976 (Exhibit K). Finally, in order to avoid even the appearance of unreasonable allocation of expenses during the general election, the Chairman of the PFC, James A. Baker, III, sent a memorandum (Exhibit L) to the Cabinet regarding their travel on behalf of the PFC. This memorandum is discussed at greater length in our conclusion.

III. SPECIFIC TRIP DATA

A. Raleigh, N. C. -- January 20, 1976

The purpose of Secretary Simon's trip to Raleigh, North Carolina, and Columbia, South Carolina, was to attend Chamber of Commerce events in each of those cities. The only PFC activity that occurred during that trip was a PFC reception held at the Royal Villa Inn in Raleigh from 7:10 p.m. to 7:40 p.m. All other activities of Secretary Simon were official in nature and the invitations for such activities were presented to the Secretary's office with no coordination by the PFC.

Secretary Simon was away from Washington for approximately eleven (11) hours with only thirty (30) minutes of this time being devoted to PFC related activity. Accordingly, pursuant to

John G. Murphy, Jr., Esquire
October 12, 1976
Page Five

our formula, a reasonable allocation would be approximately 1/22 of the total expenses incurred. However, since the staff of the Secretary of the Treasury had initially allocated the costs for each of his trips, we abided by their higher allocation of \$17.44 and reimbursed that amount.

B. Mississippi, Florida, Alabama and Texas --
February 10-16, 1976

Secretary Simon's trip to Jackson, Mississippi was for a State GOP fundraiser which was paid for by the Mississippi Republican Party. The Secretary then traveled to Jacksonville, Florida for an official function where he spoke before the Jacksonville Board of Realtors. Prior to his speech in Jacksonville, Secretary Simon was engaged in PFC activities from 7:15 a.m. to 9:00 a.m. on February 11th. Thereafter, the Secretary traveled to Clearwater, Florida where he attended a Lincoln Day dinner. All costs incurred with regard to the Clearwater portion of the trip were paid by the Clearwater Republican Party. On February 12, 1976, Secretary Simon visited Orlando for a PFC luncheon. The same day he went to Miami for an editorial board meeting with the Miami Herald and a dinner for the Junior Achievement of Greater Miami. While in that area, he attended the Dade/Broward PFC reception. The Secretary then went to Palm Beach for a luncheon before the Economic Council of Palm Beach County and two PFC events. From the 13th to the 16th, the Secretary remained in West Palm Beach vacationing with friends. This time was not included in the time-spent allocation.

Thereafter, on February 16th, the Secretary left Palm Beach for Fort Worth, Texas where he attended the annual meeting of the Texas Bankers Association. While in Fort Worth, he attended a PFC luncheon from 11:45 a.m. until 1:30 p.m. The Secretary then left Fort Worth and proceeded to Mobile, Alabama for a Chamber of Commerce dinner. That afternoon, he also attended a PFC reception from 5:05 p.m. until 6:00 p.m. Based on our allocation formula, the PFC paid \$243.43 for candidate-related activity in Florida and \$201.16 for such activity in Texas and Alabama.

C. New York, New York -- March 30, 1976

Secretary Simon went to New York on March 30, 1976, for an official event before the University Club. From 4:00 p.m. until 5:50 p.m., the Secretary attended a PFC fundraising

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

John G. Murphy, Jr., Esquire
October 12, 1976
Page Six

reception. Based on our allocation formula, the PFC reimbursed the Treasury Department \$29.01.

D. Tulsa and Oklahoma City, Oklahoma -- April 21-23, 1976

On the evening of April 21, 1976, Secretary Simon traveled to Tulsa, Oklahoma from Joliet, Illinois. The primary purpose of this trip was to give a speech before the Tulsa Chapter of the National Association of Business Economists. While in Tulsa, the Secretary attended a PFC luncheon from 11:25 a.m. to 2:00 p.m. on April 22nd. Thereafter, the Secretary gave another official speech at the University of Tulsa.

On April 23, 1976, the Secretary went to Oklahoma City for a Chamber of Commerce luncheon. While in Oklahoma City, the Secretary attended a candidate-related cocktail party on behalf of the PFC. For the Oklahoma trip, the PFC paid its allocable portion of the expenses which amounted to \$348.67.

E. Fort Wayne, Indiana -- April 8, 1976

The sole purpose for Secretary Richardson's April 8, 1976 trip to Fort Wayne, Indiana was to conduct candidate-related activities on behalf of the President. Accordingly, the PFC paid all expenses incurred in connection with this trip amounting to \$1,444.68.

F. Los Angeles, California -- May 11, 1976

The main purpose of Secretary Richardson's trip to Los Angeles on May 10, 1976, was to give a speech to the mid-year Refining Meeting of the American Petroleum Institute. While in Los Angeles, the Secretary attended a PFC business task force breakfast from 7:30 a.m. until 9:10 a.m. on May 11, 1976, and a State GOP fundraiser at noon. In addition, Secretary Richardson attended an editorial board meeting of the Los Angeles Times at the request of the PFC. Since only three out of the total thirty hours in Los Angeles were spent on PFC activity, the PFC reimbursed the Treasury one-tenth of the \$572.00 expenses of Secretary of \$57.00.

G. Detroit, Michigan -- May 14, 1976

The main purpose of Secretary Richardson's trip to Michigan and Wisconsin was to raise funds for the Wisconsin State Party and to attend a fundraiser on behalf of Congressman Cederberg of Michigan. Enroute to Washington, the Secretary layed over in Detroit. While in Detroit, he attended a question and answer

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

John G. Murphy, Jr., Esquire
October 12, 1976
Page Seven

session and press conference in Detroit. The purpose of all travel by the Secretary during his Wisconsin and Michigan trip was to influence the election of Congressional candidates. Thus, the Congressional candidates and State GOP Committees paid for his travel expenses.

H. Memphis, Tennessee and Birmingham, Alabama --
April 28, 1976

Prior to attending a Chamber of Commerce dinner in Memphis which was a purely official event, the Secretary altered his schedule at the request of the PFC to attend certain PFC-related activities in Birmingham, Alabama. Based on a direct cost allocation, the PFC paid the \$17.00 difference between air fare from Washington, D. C. to Memphis and Washington, D. C. to Birmingham. There were no other costs related to the Birmingham event.

IV. CONCLUSION

The Federal Election Campaign Act of 1971, as amended, sets forth specific reporting requirements for candidates and political committees. In particular, Section 434 provides, inter alia, that political committees must report each expenditure in excess of \$100.00. As you are aware, an expenditure is defined as:

"a purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made for the purpose of

A. influencing for nomination for election of election of any person to federal office or to the office of President and Vice Presidential elector; or

B. influencing the results of a primary election held for the selection of delegates to a national nominating convention of a political party or for the expression of a preference for the nomination of persons for election to the office of President of the United States. . . ." 2 U.S.C. §431(f)(1)(A)(B).

Expenses, however, may be incurred for either campaign-related or non-campaign-related activity. Thus, the allocation of expenses between campaign and non-campaign-related travel by an individual other than a candidate is set forth in Section 106.3 of the

FEDERAL ELECTION COMMISSION
GENERAL FILE COPY
OFFICE OF GENERAL COUNSEL

John G. Murphy, Jr., Esquire
October 12, 1976
Page Eight

proposed regulations. That section provides for a reasonable allocation to determine reportable expenditures:

"Where an individual, other than a candidate, conducts campaign-related activities on a trip, the portion of the trip attributed to each candidate shall be allocated on a reasonable basis."
Section 106.3(c)(2), 41 Fed.Reg. 35945 (Aug. 25, 1976).

In addition, subsection (e) of Section 106.3 points out that where authorized by law or required by national security, accompanying staff and equipment are not considered expenditures. Included in this exclusion are Secret Service and other security personnel.

Thus, the only standard for a campaign committee such as the PFC which establishes the allocation of expenditures between campaign and non-campaign-related travel, is one of reasonableness. We contend that the memoranda attached hereto (Exhibits J-M) which discuss the PFC position on allocation of expenditures are conservative and more than meet this standard. Expenses are allocated to the PFC based on either the time spent influencing the candidacy of the President or the direct costs incurred for such activity. The PFC has consistently applied this allocation formula to mixed official/candidate related activity on a uniform basis.

Moreover, the FEC has been generally aware of this allocation formula since last year when we testified before the Commission during its hearings on the allocation regulations. At no time has the Commission notified the PFC that the allocation formula is anything other than reasonable. In addition, it should be noted that in adopting the general standard of reasonableness, the FEC rejected serious attempts by its staff and the Allocation Task Force headed by Commissioner Staebler to specifically define appropriate allocation rules.

Finally, on September 8, 1976, James A. Baker, III, Chairman of the President Ford Committee, forwarded a memorandum to the Cabinet regarding advocate travel. (Exhibit L). Mr. Baker stated that:

"[F]or the General Election period, the following rebuttable presumptions have been established to guide both the PFC and the advocates regarding their travel and payment for related expenses:

1. All public appearances by Cabinet members after the nomination will be considered

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
RECEIVED OCT 13 1976

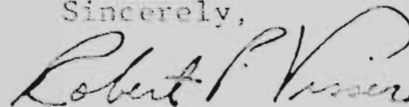
John G. Murphy, Jr., Esquire
October 12, 1976
Page Nine

candidate-related in nature and paid for by the PFC, except those official activities scheduled by the respective agency prior to August 19, 1976; and

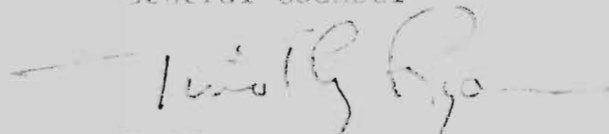
2. All public appearances by Cabinet members after October 16, 1976, including those official activities scheduled by the respective executive agency prior to August 19, 1976, will be considered candidate-related in nature and paid for by the President Ford Committee."

7304001115
This memorandum from the Chairman of the President Ford Committee and the related correspondence from James E. Connor, Secretary to the Cabinet, dated October 1, 1976 (Exhibit M) clearly reflect the manner in which this Committee strives to fully comply with the letter and spirit of the new campaign laws. This memorandum, as well as the earlier memoranda regarding advocate travel and the allocation of expenditures incurred therein, conclusively demonstrate the high standard of reasonableness set by the PFC. Since the attached documentation fully substantiates the allocations made by the PFC in connection with the matters under review, the PFC respectfully submits that the above-referenced complaints are without merit and should be dismissed.

Sincerely,



Robert P. Visser
General Counsel



T. Timothy Ryan
Assistant General Counsel

Enclosures —
Exhibits A through M

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

APPENDIX

<u>ADVOCATE</u>	<u>TRIP & DATES</u>	<u>COST LISTED</u>	<u>PFC ALLOCATION</u>
1. Simon	1/20/76 Raleigh, N.C. Columbia, S.C.	\$2,310 for air charter	\$ 17.44
2. A. Simon	2/10/76 thru 2/13/76 Mississippi & Florida	\$2,209.60 listed as flight and food	\$243.43
B. Simon & Mrs. Simon	2/16/76 Texas and Alabama	" "	\$201.16
3. Simon & Mrs. Simon	3/30/76	\$615.75 air charter	\$ 29.01
4. Richardson	5/10/76 5/11/76 Los Angeles	\$1,144.00 air fare for Richardson and aide	\$ 57.00
5. Richardson	4/28/76	\$388.00 listed as air fare for advocate and aide and miscellaneous	\$ 17.00

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

7 8 0 4 0 0 0 0 8 7

190 + 198

CC #1014

President Ford Committee

1828 L STREET, N.W., SUITE 250, WASHINGTON, D.C. 20036 (202) 457-6400

RECEIVED
FEDERAL ELECTION
COMMISSION

'76 NOV 17 AM 10:11

November 16, 1976

William Oldaker, Esquire
Assistant to the General Counsel
The Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

763694

RE: MUR 190(76) and 198(76)

Dear Bill:

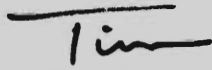
Enclosed is a letter from John Gartland, Executive Assistant to the Secretary of the Treasury, William Simon. The letter and attached memoranda set forth the itemized expenses incurred for staff travelling with the Secretary during those trips involved in the above-referenced complaints.

This information along with the previously submitted material should fully suffice with regard to the President Ford Committee's answer to these complaints.

If, however, you require additional information, please feel free to contact us.

Best regards.

Sincerely,



T. Timothy Ryan
Assistant General Counsel

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

TTR:jr
Enclosure

President Ford Committee

1628 L STREET, N.W., SUITE 250, WASHINGTON, D.C. 20036 (202) 457-6400

November 16, 1976

William Oldaker, Esquire
Assistant to the General Counsel
The Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

RE: MUR 190(76) and 198(76)

Dear Bill:

Enclosed is a letter from John Gartland, Executive Assistant to the Secretary of the Treasury, William Simon. The letter and attached memoranda set forth the itemized expenses incurred for staff travelling with the Secretary during those trips involved in the above-referenced complaints.

This information along with the previously submitted material should fully suffice with regard to the President Ford Committee's answer to these complaints.

If, however, you require additional information, please feel free to contact us.

Best regards.

Sincerely,

T. Timothy Ryan
Assistant General Counsel

TTR:jr
Enclosure

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



OFFICE OF THE SECRETARY OF THE TREASURY
WASHINGTON, D.C. 20220

November 11, 1976

Dear Tim:

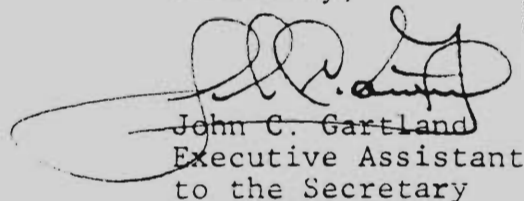
Enclosed are itemized lists of expenses incurred during travel with Secretary Simon for which Treasury Department employees were reimbursed. The trips involved are:

- Columbia, South Carolina and Raleigh, North Carolina, January 20, 1976
- Jackson, Mississippi; Jacksonville, Tampa, Orlando, Miami, Florida, February 10 - 13, 1976
- New York, New York, March 30, 1976
- Rochester, New York; Joliet, Illinois; Tulsa, Oklahoma City, Oklahoma; and Jacksonville, Florida, April 21 - 24, 1976

As I previously indicated to you, Secret Service expenditures are not included.

Please let me know if you require any further information from the Department.

Sincerely,


John C. Gartland
Executive Assistant
to the Secretary

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

T. Timothy Ryan, Esq.
Assistant General Counsel
President Ford Committee
1828 L Street, N. W.
Suite 250
Washington, D. C. 20036

Enclosure

78040011120

Harold F. Eberle
Assistant Secretary (Legislative Affairs)

Columbia, South Carolina and
Raleigh, North Carolina - January 20, 1976

No expenses, including per diem, claimed for this trip.

78040011121

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

John C. Gartland
Executive Assistant to the Secretary
of the Treasury

Columbia, South Carolina and
Raleigh, North Carolina - January 20, 1976

Expenses:	Per Diem	\$10.50
	Transportation (POA)	
	to & from airport (Wash)	6.75
	Total	<u>\$17.25</u>

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78040011122

John C. Gartland
Executive Assistant to the Secretary
of the Treasury

Jackson, Mississippi, Jacksonville, Clearwater,
Tampa, Orlando, Miami, Florida - February 10 - 13, 1976

Expenses:	Per Diem	\$115.50
	Hotel (Jacksonville Hilton, 2/10)	40.00
	Hotel (Sheraton Sand Key, Clearwater, 2/11)	40.79
	Air Transportation (Miami to Washington, 2/13)	111.73
	Miscellaneous Expenses (Taxis, ofcl. phone calls)	34.50
	Total	<u>\$342.52</u>

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

7804001121

John C. Gartland
Executive Assistant to the Secretary
of the Treasury

New York, New York - March 30, 1976

Expenses:	Per Diem	\$10.50
	Transportation (POA) to	4.50
	& from airport (Wash)	
	Miscellaneous Expenses	1.55
	(newspapers, ofcl. phone call)	
	Total	<u>\$16.55</u>

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

7304001121

John C. Gartland
Executive Assistant to the Secretary
of the Treasury

Rochester, New York; Joliet, Illinois;
Tulsa, Oklahoma City, Oklahoma; and Jacksonville, Florida
April 21 - 24, 1976

Expenses:	Per Diem	\$100.50
	Hotel (Tulsa, 4/21)	18.19
	Hotel (Oklahoma City, 4/22)	38.48
	Hotel (Jacksonville, 4/23)	11.94
	Transportation (POA)	3.75
	Transportation (Taxis)	11.25
	Miscellaneous Expenses (newspapers, ofcl. phone calls)	9.15
	Total	\$193.26

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

78740011123

William F. Rhatican
Special Assistant to the Secretary for Public Affairs

Rochester, New York; Joliet, Illinois;
Tulsa, Oklahoma City, Oklahoma - 4/21 - 4/23/76

Expenses:	Per Diem	\$ 90.75
	Miscellaneous (ofcl. phone calls, newspapers & magazines)	11.25
	Taxis (residence to airport, studio to airport in Okla. City and airport to residence upon return)	31.00
	Air Transportation via American Airlines to Wash.	108.00
	Total	<u>\$241.00</u>

Jackson, Mississippi; Jacksonville, Clearwater, Tampa,
Miami, West Palm Beach, Florida - 2/10 - 2/13/76

Expenses:	Hotels: Jacksonville Hilton	\$ 41.60
	Sheraton Sand Key, West	36.40
	Palm Beach Holiday Inn	31.20
		<u>\$109.20</u>
	Meals:	15.52
	Miscellaneous (ofcl. phone calls to office & purchase of newspapers & magazines)	22.48
	Taxi (National airport to residence)	4.50
	Returned home on commercial flight, National Airlines	<u>83.27</u>
	Total	<u>\$234.97</u>

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

President Ford Committee

1826 L STREET, N.W. WASHINGTON, D.C. 20036



William Oldaker, Esquire
Assistant to the General Counsel
The Federal Election Commission
1325 W Street, N.W.
Washington, D. C. 20463

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

NOV 17 1974 10:11

NOV 18 1974



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 190/198 File 2

